

Consolidated directors' report



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Banco Sabadell Group



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Banco Sabadell Group

Banco de Sabadell, S.A. (hereinafter also referred to as Banco Sabadell, the Bank, the Company, or the Institution), with registered office¹ in Sabadell, Plaça de Sant Roc, 20, engages in banking business and is subject to the standards and regulations governing banking institutions operating in Spain. It has been subject to prudential supervision on a consolidated basis by the European Central Bank (ECB) since November 2014.

The Bank is the parent company of a group of entities whose activity it controls directly and indirectly and which comprise, together with the Bank, Banco Sabadell Group. Banco Sabadell is formed of different financial institutions, brands, subsidiaries and investees that cover all aspects of financial business. It operates mainly in Spain, the United Kingdom and Mexico.



¹ At its meeting held on 22 January 2025, the Board of Directors of Banco Sabadell resolved to amend Article 2 of the Articles of Association to establish the registered office in Sabadell, at Plaça de Sant Roc, no. 20. The registered office was previously located in Alicante, at Avenida Óscar Esplá, 37.

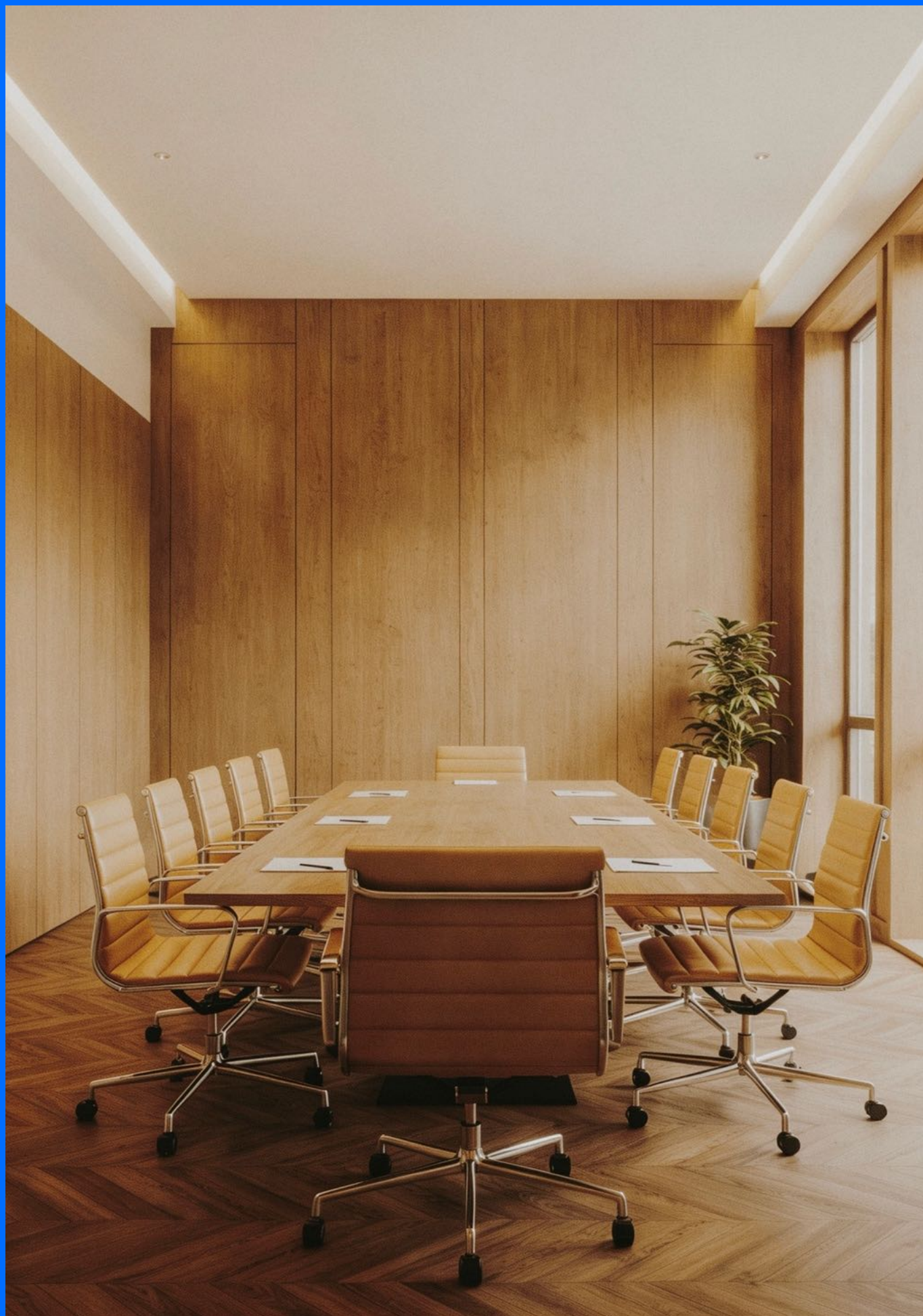
In 2025, the Group's organisation was structured around the following businesses:

- Banking Business Spain groups together the Retail Banking, Business Banking and Corporate Banking business units, with Retail Banking and Business Banking managed under the same branch network:
 - Retail Banking: offers financial products and services to individuals for personal use. These include investment products and medium- and long-term finance, such as consumer loans, mortgages, leasing and rental services, as well as other short-term finance. Funds come mainly from customers' term and demand deposits, savings insurance, mutual funds and pension plans. The main services also include payment methods such as cards and various kinds of insurance products.
 - Business Banking: offers financial products and services to companies and self-employed persons. These include investment and financing products, such as working capital products, revolving loans and medium- and long-term finance. It also offers custom structured finance and capital market solutions, as well as specialised advice for businesses. Funds mainly come from customers' term and demand deposits and mutual funds. The main services also include collection and payment methods, such as cards and Point-of-Sale (PoS) terminals, as well as import and export services. This business unit further includes Private Banking, which offers personalised expert advice, backed by specialised and high-value product capabilities for customers.
 - Corporate Banking: through its presence in Spain and in a further 11 countries, it offers financial and advisory solutions to large Spanish and international corporations and financial institutions. It structures its activity around two pillars, the first of which is the customer. It aims to serve its customers who are natural persons to meet the full range of their financial needs. This pillar is determined by the nature of those customers and includes large corporations classed under the Corporate Banking umbrella, financial institutions, Private Banking clients in the United States and the venture capital business carried out through BSCapital. The second pillar is specialised business, which encompasses the activities of Structured Finance, Treasury, Investment Banking, and Trading, Custody & Research. Its goal is to advise, design and execute custom operations that anticipate the specific financial needs of its customers, be they companies or individuals, with its scope of activity ranging from large corporations to smaller companies and customers, insofar as its solutions are the best way to meet their increasingly complex financial needs.
- Banking Business UK: the TSB franchise covers business conducted in the United Kingdom, which includes current and savings accounts, loans, credit cards and mortgages.
- Banking Business Mexico: offers banking and financial services for Corporate Banking, Commercial Banking and Retail Banking.

As described in Note 2, following receipt of a binding offer from Banco Santander to acquire TSB, the Board of Directors of Banco Sabadell, at its meeting of 1 July 2025, agreed to submit the offer for approval at an Extraordinary General Meeting at which, on 6 August 2025, shareholders approved the sale of all shares representing the share capital of TSB to Banco Santander. The closing of the transaction, which is expected to take place during the second quarter of 2026, is subject to obtaining regulatory authorisations from the competent authorities.

Banco Sabadell is the parent undertaking of a group of companies that, as at 31 December 2025, numbered a total of 79. Of these, aside from the parent company, 57 are considered subsidiaries and 21 are considered associates (as at 31 December 2024, there were 84 companies: the parent company, 61 subsidiaries and 22 associates).





1.1 Mission, values and business model

Mission and values

Banco Sabadell helps people and businesses bring their projects to life, anticipating their needs and helping them make the best economic decisions. It does this through environmentally and socially responsible management.

This is Banco Sabadell's *raison d'être*: to help its customers make the best economic decisions so that they may see their personal and/or business projects take shape. To that end, it gives customers the benefit of the opportunities offered by big data, digital capabilities and the expertise of its specialists.

The Bank and those who form part of it share the values that help to accomplish this mission, however, wherever and whenever that may be.

Banco Sabadell accomplishes its mission while staying true to its values:

- Commitment and Non-Conformism, values that define its way of being.
- Professionalism and Effectiveness, values that define its way of working.
- Empathy and Openness, values that define its way of interacting.

Business model, main objectives achieved and actions taken

The Institution's business model is geared towards profitable growth that generates value for shareholders. This is achieved through a strategy of business diversification based on criteria related to profitability, sustainability, efficiency and quality of service, together with a conservative risk profile, while maintaining high standards of ethics and professional conduct combined with sensitivity to stakeholders' interests.

The Bank's management model focuses on a long-term vision of customers, through constant efforts to promote customer loyalty by adopting an initiative-based and proactive approach to the relationship through the various channels that the customers of the Bank have at their disposal. The Bank offers a comprehensive range of products and services, qualified personnel, an IT platform with ample capacity to support future growth, and a relentless focus on quality.

The organic growth seen in recent years has brought the Bank's domestic market share to 8% in loans and 7% in deposits. Banco Sabadell also has a good market share in other products, such as financing granted to non-financial corporations at 9%, mutual funds at 5% and PoS turnover at 16%.

With regard to international business, Banco Sabadell has always been a benchmark. This has not changed in 2025 and Banco Sabadell continues to be present in strategic areas, supporting companies in their international activity. It should be noted that, as indicated previously, the sale of the British subsidiary TSB was approved on 6 August 2025. This is a transaction that benefits the Institution and its shareholders as it makes it possible to return excess capital and focus on Sabadell's development in the Spanish market. The transaction is expected to close in the second quarter of 2026.

With these developments, the Group has become one of the largest institutions in Spain's financial system, having multiplied its customer base six-fold since 2008, all whilst safeguarding its solvency and liquidity.

Trump's return to the United States' presidency has shaped the course of events on a global scale in 2025. One of the key aspects to draw attention has been the tariff war, which has led to substantially higher tariffs imposed by the United States on the rest of the world. Beyond trade, the Trump administration's agenda has also led to institutional changes, both internally (greater influence over autonomous agencies) and externally (loss of support for multilateral agreements and/or institutions). In addition, the state of the public finances continued to be a cause for concern, not only in the United States but also in countries such as France and the United Kingdom. In the geopolitical arena, Trump did not achieve his goal of quickly bringing the conflict in Ukraine to an end, while instability remained the keynote in the Middle East, albeit with a limited impact on oil prices. Despite the prevailing geostrategic confrontation and fiscal vulnerabilities, economic growth remained resilient, buoyed by cuts to official interest rates and by the widespread deployment of artificial intelligence. In relation to the financial markets, 2025 was once again a very positive year, particularly for risk assets. Lastly, the Spanish economy has continued to record strong economic growth of around 3% year-on-year. The growth of the economy has been driven by domestic demand, with good performance recorded in both household consumption and investment. Consumption was supported by the favourable evolution of the labour market and significant migration flows, while investment benefited from the rollout of the NGEU funds.

In this respect, in year-on-year terms, the Bank's results are in line with the annual targets. It is worth noting the reduced cost of risk, the active and growing commercial momentum, and the contained increase in costs.

On the other hand, the tender offer announced by Banco Bilbao Vizcaya Argentaria, S.A. (BBVA) for all shares issued by Banco Sabadell was authorised by the CNMV on 5 September 2025. Following the end of the acceptance period, on 16 October 2025 the CNMV announced that the tender offer had failed after a sufficient number of Banco Sabadell shareholders chose not to accept it, thereby rendering the offer null and void (for further details, see Note 1.5 to the 2025 consolidated annual financial statements).

Additionally, Banco Sabadell and Nexi. S.p.A. terminated the strategic agreement signed by both parties on 27 February 2023, thereby extinguishing the commitments undertaken by the parties (for further details, see Note 2 to the 2025 consolidated annual financial statements).

Banco Sabadell conducts its business in an ethical and responsible manner, gearing its commitment to society in a way that ensures its activities have a positive impact on people and the environment. Each and every person in the organisation plays their part in applying the principles and policies of corporate social responsibility, ensuring high-quality and transparent customer service.

In addition to complying with the applicable regulations and standards, Banco Sabadell has a set of policies, internal rules and codes of conduct that guarantee ethical and responsible behaviour at all levels of the organisation and in all Group activities.

1.2 Strategic Plan 2025-2027

On 24 July 2025, Banco Sabadell unveiled its Strategic Plan 2025-2027, outlining the Group's strategic direction and providing an outlook on its key financial figures.

The new plan concentrates on the Group's activity in Spain, taking advantage of its good macroeconomic outlooks, with a clear focus on growth, whilst preserving risk quality and maintaining ample capacity to generate capital, thus enabling an attractive return for shareholders.

Looking ahead to 2027, Banco Sabadell expects a return of 16% and shareholder remuneration of 6.45 billion euros over the period 2025-2027. To achieve this, the Bank expects the growth of its commercial activity in Spain to outpace the market in most business segments, whilst improving its risk profile, increasing revenues and maintaining efficient cost management.

A domestic Spanish bank, where decisive execution drives growth, capital generation and attractive shareholder remuneration.

Focus on Spain

Following the sale of TSB, Banco Sabadell will focus its strategy on Spain – a predictable and stable market with one of the most positive macroeconomic outlooks in the European Union in the coming years:

- Private debt to Gross Domestic Product (GDP), which is below the Eurozone average, is at its lowest level in the last 20 years and is expected to remain at that level.
- Economic unemployment is at its lowest level since 2008, maintaining a good outlook going forward.
- The expected average annual growth of Spanish GDP for the period 2026-2028 (1.8%) exceeds that of the Eurozone (1.3%).
- Inflation in the Spanish economy (2.2%) will remain in line with that of the European Union (2.1%) over the period 2026-2026.

With regard to growth of lending in Spain, the Plan anticipates compound annual growth of more than 4% in household loans and around 4% in business loans over its time horizon. For deposits, a positive performance is also expected, with an annual growth rate of around 4%.

Focus on growth

Since 2021, Banco Sabadell has been carrying out an in-depth transformation process, paving the way for the future growth of the Institution.

The transformation undertaken up to now has focused on three key areas:

- In risks, the focus has been on transforming risk models and processes across all credit portfolios, as well as increasing sectoral specialisation.

- In pricing, the transformation has concentrated on increasing price segmentation based on customers' risk profile and their price sensitivity.
- In processes, emphasis has been placed on (i) redesigning the customer journey, with particular focus on the customer experience and on improving the conversion ratio, (ii) improving the Bank-customer relationship model (for example, by deploying specialists in mortgages, insurance and savings & investment products, and by improving the value proposition for Private Banking and SMEs), and (iii) developing the necessary capacity to make a qualitative leap in digitalisation.

This transformation has placed the Bank in a good position to accelerate its future growth, both in terms of credit volume, whilst preserving risk quality, and in terms of fee income and the customer base, with the goal of increasing the size of the franchise:

- Credit (single-digit average annual growth between 2024 and 2027): with most of the transformation process completed, credit volume growth will accelerate between 2025 and 2027, with expectations of an increase above the market average in the business segment, well above the market average in consumer credit and in line with the market average in mortgages. Alongside the growth in credit volume, risk quality has improved significantly in recent years and is expected to continue to grow stronger (cost of risk of around 40 basis points is estimated in 2027).
- Fees and commissions (single-digit average annual growth between 2024 and 2027): future growth will be driven, roughly 70%, by the transformation of the three key business lines that generate fee income: savings & investment, insurance, and payment services.
- Customer base (gross acquisition of retail customers between 2025 and 2027 is expected to be 15% higher compared to the period from 2022 to 2024): the transformation carried out between 2021 and 2024 has allowed the development of new direct banking capabilities, with the aim of focusing on digital customer acquisition going forward, without relinquishing branch-based customer acquisition.

Technology, people and performance metrics are key elements that will support the future growth of the business. This growth has already materialised in the results for 2025.

Track record

Banco Sabadell has built a solid track record of execution since 2021, having met the targets initially set for each year. This trend was maintained in 2025, with the results obtained for the year being in line with guidance.

Shareholder remuneration

Following the trend demonstrated in recent years, Banco Sabadell expects to continue growing recurrently and sustainably.

Over the time horizon of the Plan, profitability as measured by ROTE is expected to reach 16% in 2027, generating an annual average of 175 basis points of capital (pre-dividend accrual). All this, combined with the extraordinary dividend stemming from the sale of TSB, will allow a distribution to shareholders in the amount of 6.45 billion euros in the period 2025-2027, which equates to around 40% of the Bank's stock market value².

² Closing share price on 17 February 2026 (€3.196).

Sabadell has a strong commitment to shareholder remuneration.

The guidance set out in the Group's Strategic Plan was reflected in the income statement for this year as follows:

Net interest income has been maintained albeit under pressure, amounting to 4,837 million euros at the Group level and 3,604 million euros excluding TSB in 2025, in line with the year-end target of 3,600 million euros ex-TSB. This evolution reflects the impact of the narrowing customer spread, which, excluding TSB, fell from 3.3% to 2.9% in the year, partly offset by larger loan and deposit volumes, as well as a lower cost of wholesale funding. At TSB, net interest income has made a steady recovery, ending the year with a high single-digit increase, as expected, mainly due to the contribution of structural balance sheet hedging.

Fees and commissions increased by 2.0% in the year at the Group level and by 3.6% excluding TSB, mainly as a result of higher asset management and insurance fees. This means that this line item has grown at levels close to the year-end target of mid-single-digit growth excluding TSB.

With regard to costs, the year-on-year increase at the Group level was 0.5%, as a result of higher staff expenses, which were partially offset by other general administrative expenses. Excluding TSB, this line item increased by 2.5%, mainly due to higher staff expenses. Total costs excluding TSB have evolved in line with the year-end target of a low single-digit increase, despite the share-based extraordinary remuneration paid to all employees related to the end of the takeover bid, and a reclassification related to the termination of the agreement on the sale of the merchant acquiring business, which impacted the depreciation line. Both of these impacts were recorded in the last quarter of the year.

With a total cost of risk of 31 basis points, equivalent to 546 million euros of provisions and impairments in 2025 at the Group level and 37 basis points ex-TSB, the year-end target of 40 basis points ex-TSB has been met, thanks to a diversified balance sheet, risk management actions and the positive evolution of asset quality.

In addition, the profitability reported for 2025, measured in terms of Return On Tangible Equity (ROTE), was 14.3%, close to the targeted ROTE of 14.5%, which improved (from 14%) in the second quarter of the year, when targets were set in the Strategic Plan 2025-2027. In addition, it is expected that in 2026 the resilience of the Group's income statement will allow it to attain recurrent profitability, excluding TSB and its impacts, of 14.5%, measured in terms of tangible equity.

Lastly, in relation to shareholder remuneration, on 5 February 2026, the Board of Directors of Banco Sabadell raised shareholder remuneration against earnings for 2025 to 1.5 billion euros, consisting of a 60% payout plus a distribution of 435 million euros of excess capital above the fully-loaded CET1 ratio of 13% applying the regulatory implementation timeline of the output floor on a consolidated basis.

1.3 Banco Sabadell share performance

The Bank's share capital as at 31 December 2025 amounted to 627,959,716.50 euros, represented by 5,023,677,732 registered shares with a par value of 0.125 euros each (as at 31 December 2024, it amounted to 680,027,680.875 euros, represented by 5,440,221,447 registered shares, each with a par value of 0.125 euros).

The agenda of the United States administration shaped the economic and financial environment in 2025. Specifically, in the area of international trade, the US raised tariffs, which were subsequently eased by trade agreements. On the other hand, the sustainability of the public finances continued to provoke concern in the United States and in some European economies, such as France. At the geopolitical level, there was continued instability generated by the conflicts in Ukraine and the Middle East. Nevertheless, the economy and the financial markets demonstrated resilience thanks to the thrust of artificial intelligence, expectations of rate cuts and a raft of solid corporate earnings.

Spain stood out among the main Eurozone countries once again and saw strong economic growth of around 3% year-on-year. Once again, Spain's economic growth was higher than the consensus had expected at the beginning of the year. The economy was underpinned by, among other things, migration flows and the NGEU funds. Lastly, Spain has been relatively well protected from the US tariffs due to its limited trade exposure with that country. Labour market data has also been positive, with employment at record highs and unemployment at its lowest rate since 2008.

With regard to the central banks, the year was marked by the ongoing normalisation of monetary policy, although progress was uneven across regions. The main monetary authorities implemented cuts to their benchmark interest rates, in a context of inflation closer to or around the monetary policy targets and slowing economic growth. In the Eurozone, the ECB reduced the deposit facility rate to 2.00% and, subsequently, maintained a prudent stance in relation to further adjustments. The Federal Reserve's rate cuts were more restrained (down to 3.50-3.75%) in a context of moderated job creation and upward pressure on inflation as a result of the new tariffs. In the United Kingdom, the Bank of England continued with incremental cuts to the base rate, bringing it down to 3.75%. In the bond markets, geopolitical tensions and, in particular, the announcement of 'Liberation Day', brought on increased volatility affecting yield curves. Nevertheless, with the exception of this episode, interest rates have been quite stable over the course of the year, with long-dated bonds trading at historically high levels.

The countercyclical capital buffer (CCyB) of 0.5%, set by the Bank of Spain, was applied as from October 2025 with plans to raise it to 1% from October 2026 if the cyclical systemic risks persist.

All in all, profitability in the banking sector has been solid over the year, exceeding the cost of capital demanded by the market, thanks to sustained profits in an interest rate environment favourable to financial intermediation, despite the gradual monetary normalisation.

As regards Banco Sabadell's share price performance, it has kept the good tone of recent years, with a dividend-adjusted revaluation of +96% in the year. On a like-for-like basis, the market revaluation was above the European banking industry benchmark (STOXX Europe 600 Banks), which rose by +67%, and also above general indices such as EURO STOXX 50 and IBEX 35, which cumulatively increased by +14% and +49%, respectively, over the year.

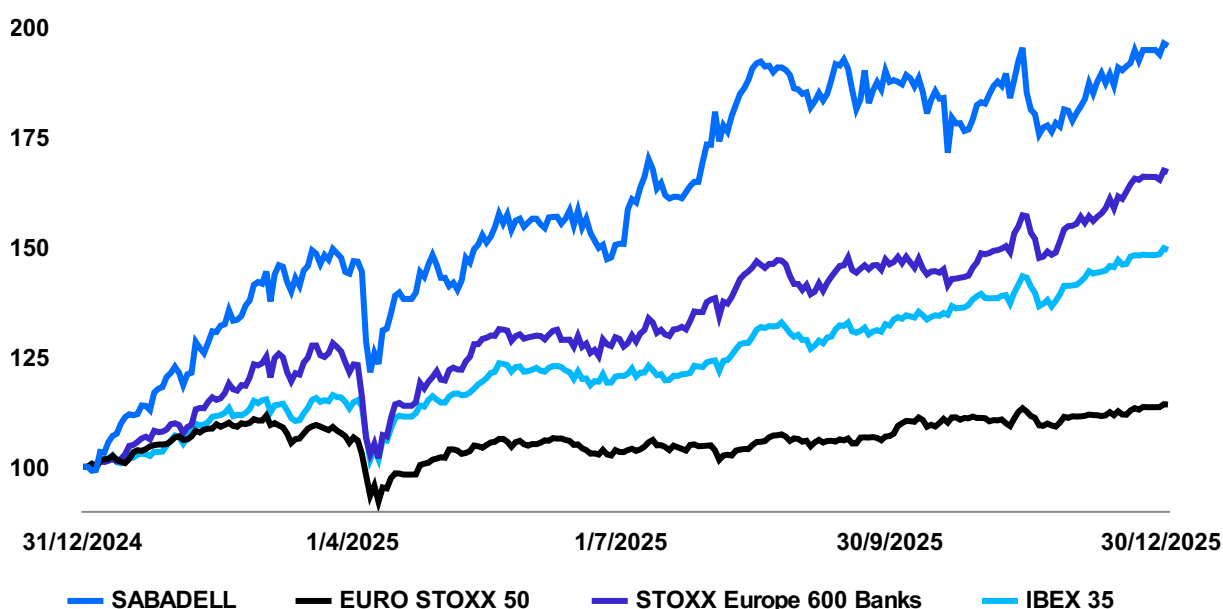


In this respect, the factors pertaining to the economic and financial environment mentioned above significantly influenced the share price performance. Similarly, in relation to Banco Sabadell's idiosyncratic factors, certain influencing elements worth noting include, on one hand, the Institution's improved financial position and profit estimates, validated in July during the presentation of the new Strategic Plan 2025-27, and, on the other hand, the events surrounding the takeover bid put forward by Banco Bilbao Vizcaya Argentaria, S.A. and the outcome of that bid, which ultimately served to reinforce the Institution's standalone strategy.

As at the end of 2025, the average target price among equity analysts covering Banco Sabadell was 3.7 euros, all with Buy or Hold recommendations on the stock.

Banco Sabadell's market capitalisation stood at around 16,818 million euros as at year-end, with a Price/Tangible Book Value (P/TBV) ratio of 1.40x.

Over the year, the main rating agencies also improved their credit ratings for Banco Sabadell.



	Million	Million euro	Euro	Million euro	Euro
	Average number of shares (*)	Profit attributed to the Group	Profit attributed to the Group, per share	Own funds	Book value per share
2022 (**)	5,594	889	0.140	13,635	2.43
2023	5,401	1,332	0.225	14,344	2.65
2024	5,376	1,827	0.322	15,389	2.87
2025	5,152	1,775	0.316	14,631	2.93

(*) The average number of shares is shown net of the treasury stock position.

(**) The data corresponding to 2022 was restated to take into account the entry into force of IFRS 17 (see Note 1.4 to the consolidated annual financial statements for 2023).

Share performance

Below are a number of indicators of the Bank's share performance:

	2025	2024	Year-on-year change (%)
Shareholders and trading			
Number of shares outstanding (million) (*)	4,998	5,361	(6.8)
Average daily trading (million euro)	45	38	16.7
Share price (euro)			
Opening	1.877	1.113	—
High	3.482	2.050	—
Low	1.795	1.105	—
Closing	3.365	1.877	—
Market capitalisation (million euro)	16,818	10,063	—
Market ratios			
Earnings Per Share (EPS) (euro)	0.32	0.32	—
Book value per share (euro)	2.93	2.87	—
P/TBV (price/tangible book value per share)	1.40	0.78	—
Price/Earnings ratio (share price/EPS)	10.64	5.84	—

(*) Total number of shares minus final treasury stock position (including shares in buyback programmes, where applicable).

Shareholder remuneration in the amount of 1.5 billion euros against earnings for 2025.

The Bank's shareholder remuneration commitment, in accordance with its Articles of Association, is proposed by the Board of Directors and submitted to shareholders for approval every year at the Annual General Meeting. In addition, Banco Sabadell has a Shareholder Remuneration Policy that lays down the principles that determine the shareholder remuneration framework.

The percentage of profits to be paid out as remuneration to shareholders, that is, the Group's payout, was set at 60% of net profit attributed to the Group.

In addition, the Banco Sabadell Shareholder Remuneration Policy makes provision for the possible distribution of excess capital above a minimum threshold predetermined by the Board of Directors. Currently, regulatory capital above the threshold of 13%³ can be considered excess capital and can therefore be paid out as remuneration to shareholders, in the absence of any alternative use for that capital.

On 10 April 2024, shareholders at the Annual General Meeting approved a share buyback programme in the amount of 340 million euros, as part of shareholder remuneration against earnings for 2023. This programme, which had been temporarily suspended at the request of the CNMV due to the publication of the announcement of the tender offer put forward by Banco Bilbao Vizcaya Argentaria, S.A., was reactivated on 31 March 2025 following approval by shareholders at the Annual General Meeting and was completed on 8 May 2025, having

³ Fully-loaded CET1, applying the output floor's regulatory implementation timeline.

reached the maximum pecuniary amount outstanding of 247 million euros envisaged in the Buyback Programme.

Following completion of the aforesaid reactivated share buyback programme, and in accordance with the approval by shareholders at the Annual General Meeting of 20 March 2025, another share buyback programme was launched on 9 May 2025 in the amount of 755 million euros, which was completed on 1 August 2025.

At Board meetings held on 29 May 2025 and 5 August 2025, the Board of Directors of Banco Sabadell agreed, pursuant to the authorisation received from the European Central Bank, to carry out reductions in the share capital of Banco Sabadell by redeeming all of the treasury shares acquired under the aforementioned share buyback programmes. That reduction was approved as per the powers conferred on the Board of Directors in the share capital reduction resolution approved by shareholders during the aforesaid Annual General Meeting of 20 March 2025. The resulting share capital stood at 627,959,716.50 euros represented by 5,023,677,732 registered shares with a par value of 0.125 euros each.

At a meeting held on 1 July 2025, the Board of Directors of Banco Sabadell agreed to submit a proposal for consideration by shareholders at an Extraordinary General Meeting concerning the payment of an extraordinary cash dividend of 50 euro cents (gross) per share, conditional on closing the sale of TSB. This dividend distribution proposal was submitted to shareholders at the Extraordinary General Meeting of 6 August 2025, with a favourable result.

At its meeting of 23 July 2025, in compliance with the Group's shareholder remuneration policy and in the context of the update of the Strategic Plan 2025-2027, which was published on 24 July 2025, Banco Sabadell's Board of Directors agreed to distribute an interim cash dividend against 2025 earnings in the amount of 7 euro cents (gross) per share, which was paid on 29 August.

Additionally, at the aforesaid meeting of 23 July 2025, the Board of Directors also produced a preliminary estimate of potential total shareholder remuneration for the period 2025-2027 in the amount of 6.3 billion euros, including the extraordinary dividend from the sale of TSB, bringing the estimated remuneration for 2025 to 1.3 billion euros.

At its meeting of 30 September 2025, based on the positive trend of the business, earnings and capital generation, the Board of Directors updated its estimate of total shareholder remuneration for the period 2025-2027 to 6.45 billion euros, setting shareholder remuneration for 2025 at 1.45 billion euros. In addition, at that same meeting, the Board of Directors approved a second interim cash dividend for 2025 of 7 euro cents (gross) per share, which was paid on 29 December 2025.

At the meeting held on 5 February 2026 and in accordance with Banco Sabadell's shareholder remuneration policy, the Board of Directors of Banco Sabadell, after obtaining prior authorisation from the European Central Bank, agreed to set up two share buyback programmes to repurchase treasury shares for their subsequent redemption, up to a maximum aggregate amount of 800 million euros. To that end, the Board of Directors approved the allocation of a maximum of 435 million euros to the first share buyback programme, equivalent to excess capital above the fully-loaded CET1 ratio of 13% applying the regulatory implementation timeline of the output floor on a consolidated basis. Furthermore, the Board of Directors decided to allocate a maximum of 365 million euros to the second share buyback programme, equivalent to the difference between 60% of the net profit attributed to the Group for 2025 (the payout ratio at the top end of the range established in the shareholder remuneration policy) and the cash dividends paid out of 2025 earnings.

Credit ratings

In 2025, the four agencies that assessed Banco Sabadell's credit quality were S&P Global Ratings, Moody's Ratings, Fitch Ratings and Morningstar DBRS.

On 27 March, S&P Global Ratings upgraded Banco Sabadell's long-term issuer credit rating to A- from BBB+, with a stable outlook. The rating upgrade was the result of Sabadell's improved credit profile, which the agency sees as commensurate with its peers, as well as easing industry risks in the Spanish banking system. The short-term rating was kept at A-2. Later, on 11 August, the agency affirmed the Bank's rating following the approval of the sale of TSB Banking Group plc. Lastly, on 16 December, the agency upgraded the outlook from *stable* to *positive*, affirming the issuer's long-term and short-term credit ratings of A- and A-2, respectively. The upgraded outlook reflects the possibility that S&P Global Ratings could raise Banco Sabadell's ratings if it manages to build up and sustain a buffer of bail-inable subordinated instruments large enough (i.e. more than 6%) to provide enhanced protection to senior debtholders in a resolution scenario.

On 3 October, Moody's Ratings upgraded Banco Sabadell's long-term deposit rating to A3 from Baa1 and its senior unsecured debt rating to Baa1 from Baa2, with a stable outlook in both ratings. It also upgraded the rating of the Bank's mortgage covered bonds to Aaa from Aa1. These upgrades reflect the Bank's improved solvency, supported by the continuous enhancement of its asset quality and the improved profitability. The short-term rating was kept at P-2. On 18 November, Moody's Ratings affirmed those ratings, following the publication of its new methodology.

On 10 January, Fitch Ratings upgraded Banco Sabadell's long-term rating to BBB+ from BBB and maintained the stable outlook. The upgrade was driven by the strengthening of the Bank's asset quality, profitability and capitalisation, as well as the improved assessment of the operating environment for Spanish banks. The short-term rating was kept at F2. In addition, on 9 May, the agency placed Banco Sabadell on rating watch positive, subsequently reversing it on 27 October after the unsuccessful takeover bid put forward by BBVA, affirming the long- and short-term ratings on that same date and assigning them both a stable outlook.

On 18 February, Morningstar DBRS affirmed Banco Sabadell's long-term issuer rating at A (low) with a stable outlook, highlighting the Institution's improved profitability and its significant reduction of non-performing loans. The agency also expects that the Bank will continue to report solid profitability despite the lower interest rate environment, largely supported by the lending volume growth and the materialisation of cost savings implemented in TSB. The short-term rating remained at R-1 (low).

During 2025, Banco Sabadell has been in continuous contact with the four rating agencies. In its meetings with analysts from those agencies, aspects such as progress with results, capital, liquidity, risks, credit quality, and management of NPAs were discussed and debated.

The table below details the current ratings and the most recent date of publication of an update or affirmation of those ratings.

	Long-term	Short-term	Outlook	Last updated
S&P Global Ratings	A-	A-2	Positive	16/12/2025
Moody's Ratings	Baa1	P-2	Stable	18/11/2025
Fitch Ratings	BBB+	F2	Stable	27/10/2025
Morningstar DBRS	A (low)	R-1 (low)	Stable	18/02/2025



1.4 Corporate governance

Banco Sabadell has a solid corporate governance structure that ensures effective and prudent management of the Bank, in which it prioritises ethical, sound and transparent governance, taking into account the interests of shareholders, customers, employees and the general public in the geographies in which it operates.

The internal governance framework, which gives details, among other aspects, about its shareholding structure, the governing bodies, the Group's structure, the composition and operation of corporate governance, the internal control functions, key governance matters, the risk management framework, the internal procedure for the approval of credit transactions granted to directors and their related parties and the Group's policies, is published on the corporate website:

www.grupbancsabadell.com (see section "Corporate Governance and Remuneration Policy – Internal Governance Framework").

As required by Article 540 of the Spanish Capital Companies Act, Banco Sabadell Group has prepared the Annual Corporate Governance Report for the year 2025, which, in accordance with Article 49 of the Spanish Commercial Code, forms part of the consolidated Directors' Report for 2025. It includes a section on the extent to which the Bank follows recommendations on corporate governance currently in existence in Spain.

As it has done on previous occasions, Banco Sabadell has opted to prepare the Annual Corporate Governance Report in free PDF format, in accordance with CNMV Circular 2/2018 of 12 June, in order to explain and publicise, with maximum transparency, the main aspects contained therein.



Annual General Meeting 2025

The Bank's main governing body is the Annual General Meeting, in which shareholders decide on matters attributed to the Meeting by law, the Articles of Association (available on the corporate website under "Corporate Governance and Remuneration Policy – Articles of Association") and its own Regulation, as well as any business decisions that the Board of Directors considers to be of vital importance for the Bank's future and corporate interests.

The Annual General Meeting has approved its own Regulation, which sets out the principles and basic rules of action (see corporate website under "Shareholders' General Meeting – Regulations of the Shareholders' Meeting"), safeguarding the rights of shareholders and transparency of information.

At the Annual General Meeting, shareholders may cast one vote for every thousand shares that they own or represent. The Policy for communication and contact with shareholders, institutional investors and proxy advisors, approved by the Board of Directors and compliant with the Good Governance Code of Listed Companies of June 2020, aims to promote the transparency of public information and build trust while safeguarding, at all times, the legitimate interests of institutional investors, shareholders and proxy advisors and of all other stakeholders of Banco Sabadell.

The Bank has maintained the highest standards of transparency and participation to improve and promote the participation of shareholders at both the Ordinary Annual General Meeting of 20 March 2025 and at the two Extraordinary General Meetings held on 6 August 2025, so that they were able to attend these events not only in person but also, (as made possible by the Bank since 2022), remotely through a live broadcast, as well as being able to vote on motions on the agenda and speak during question time. To that end, the Bank reiterated that it has set up electronic channels through Banco Sabadell's websites (corporate website and BSOOnline) and its mobile app (BSMovil) so that shareholders can delegate and cast their vote in advance of the General Meetings.

Those channels are embedded on the Bank's website and they provide a fast and straightforward experience to customers who are shareholders and to shareholders in general, in addition to making interactions easier.

The 2025 Annual General Meeting, convened on 6 February 2025, took place on 20 March 2025, on second call.

At the Annual General Meeting held on 20 March 2025, shareholders approved all items on the agenda, among them the annual financial statements and the corporate management of the financial year 2024 and, in relation to appointments, they approved the re-election to the Board of César González-Bueno Mayer Wittgenstein, in the capacity of Executive Director, and of Manuel Valls Morató, in the capacity of Independent Director. On 6 February 2025, Laura González Molero tendered her resignation as an Independent Director of Banco Sabadell, effective from the date of the Annual General Meeting. On that same date, Alicia Reyes Revuelta communicated her decision not to stand for re-election as an Independent Director of Banco Sabadell due to her professional commitments, thus resigning from the position with effect from the date of the next Annual General Meeting. To fill these vacancies, during the aforesaid Annual General Meeting, at the proposal of the Board Appointments and Corporate Governance Committee, shareholders agreed to appoint María Gloria Hernández García and Margarita Salvans Puigbò as Independent Directors. They joined the Board for the first time at the Board meetings held on 29 May 2025 and 26 June 2025, respectively, having received the corresponding regulatory authorisations.

In light of the analysis of best practices observed in the market when defining the amount, format, frequency and recurrence of shareholder remuneration, the Board of Directors submitted a new Banco Sabadell Shareholder Remuneration Policy to the 2025 Annual General Meeting for consideration by shareholders, obtaining 99.86% votes in favour.

At the aforesaid Annual General Meeting shareholders approved, under point 5 of the agenda and with 99.18% votes in favour, the reactivation of the share buyback programme (originally approved by the Board of Directors in accordance with point 4 of the agenda for the Annual General Meeting of 10 April 2024 and subsequently temporarily suspended on 13 May 2024, at the request of the CNMV received on that same date in light of the publication of the prior announcement of the voluntary tender offer put forward by BBVA for the acquisition of Banco Sabadell shares representing its total share capital), along with the consequent reduction in share capital by the par value of treasury shares that could be acquired by the Institution under the aforesaid reactivated share buyback programme for a maximum pecuniary amount of 247 million euros.

Shareholders at the Annual General Meeting also approved, under point 6 of the agenda and with 99.11% votes in favour, the establishment of a new share buyback programme with the consequent reduction in share capital by the par value of treasury shares that could be acquired by the Institution under said share buyback programme for a maximum pecuniary amount of 755 million euros. Both share buyback programmes were fully executed, as were the respective capital reductions through the redemption of the treasury shares acquired under those programmes. For more information on the terms and timeframes of the above programmes, please see Notes 3 and 22 to the 2025 consolidated annual financial statements.

The Banco Sabadell Annual General Meeting has once again been certified as a 'Sustainable Event', having satisfactorily met the sustainability criteria for certification and having passed the preliminary assessment process and the in-person audit conducted by Eventsost, a comprehensive sustainability certification platform for events. The certification is based on the event sustainability standards considered in the Eventsost certification scheme for sustainable events, and on alignment with the Sustainable Development Goals of the UN's 2030 Agenda applied to event production.

In addition, an external consultant verified the procedures established for preparing and holding the 2025 Annual General Meeting.

The external consultant carried out an individual analysis of each of the phases into which the review was divided (phase I: pre-Meeting, phase II: Meeting, and phase III: post-Meeting), concluding that, from a technical, procedural and legal point of view, all requirements, internal procedures and applicable regulations had been complied with in the three phases analysed.

Extraordinary General Meetings

At its meeting of 3 July 2025, under the provisions of the Articles of Association and the Regulation of the General Meeting of Shareholders, the Board of Directors of Banco Sabadell approved the convening of two Extraordinary General Meetings on 6 August 2025, at second call, the first held at 10am and the second at 1pm.

At the first of the aforesaid General Meetings, shareholders were asked to vote on whether to authorise the disposal of the entire share capital of Banco Sabadell's subsidiary TSB Banking Group plc and other equity instruments and securities issued by the latter. At the second General Meeting, shareholders were asked to vote on whether to approve an extraordinary cash dividend of 50 euro cents (gross) per share charged against unrestricted voluntary reserves, subject to the sale of TSB Banking Group plc and payable on the last business day of the month following the receipt of the sale price. Both items were approved by a very large majority of shareholders: 99.578% voted in favour of the disposal of TSB Banking Group plc and 99.656% voted to approve the extraordinary dividend.

At both General Meetings, as occurred at the Annual General Meeting of 20 March 2025, it was agreed that voting and representation could be carried out and delegated, respectively, remotely prior to the General Meeting.

The Board of Directors also agreed to put the necessary systems and procedures in place to enable shareholders and their proxies to attend using electronic means that allow real-time connection with the venue where the General Meeting is held, and to enable them to participate and vote using the systems and procedures put in place for that purpose.

The two Extraordinary General Meetings were also certified as 'Sustainable Events', in accordance with the same aforementioned sustainability standards and criteria applicable to the 2025 Annual General Meeting, and successfully passed the assessment and in-person audit conducted by Eventsost.

Information regarding the 2025 General Meetings is published on the corporate website: www.grupbancsabadell.com (see section "Shareholders and Investors - Shareholders' General Meeting").

Composition of the Board of Directors

With the exception of matters reserved to the Annual General Meeting, Banco Sabadell's Board of Directors is the most senior decision-making body of the Company and its consolidated Group, as it is responsible, under the law and the Articles of Association, for the management and representation of the Bank. The Board of Directors acts mainly as an instrument of supervision and control, delegating the management of ordinary business matters to the Chief Executive Officer.

The Board of Directors is subject to well-defined and transparent rules of governance, in particular to the Articles of Association and the Regulation of the Board of Directors (available on the corporate website under "Corporate Governance and Remuneration Policy – Regulation of the Board of Directors"), and it conforms to best practices in the area of corporate governance.

As at 31 December 2025, the Board of Directors was formed of 14 members: its Chairman (in the capacity of Other External Director), ten Independent Directors, two Executive Directors and one Other External Director. The composition of the Board keeps an adequate balance between the different director categories that comprise it.

The Board of Directors has a diverse and efficient composition. It is of the appropriate size to perform its duties effectively by drawing on a depth and diversity of opinions, enabling it to operate with a good level of quality and effectiveness and in a participatory way. Its members are suitably diverse in terms of skill sets, professional background, origin and gender, and they have extensive experience in banking, finance, anti-money laundering & counter-terrorist financing, digital transformation & IT, insurance, risk & auditing, in regulatory affairs and the law, in academia, human resources & consultancy, responsible business practices & sustainability, as well as in international business. The Board's Matrix of Competences and Diversity can be consulted on the website in Banco Sabadell's Internal Governance Framework (see corporate website section "Corporate governance and Remuneration Policy – Internal Governance Framework").

Banco Sabadell has had this competences and diversity matrix in place since 2019, which is reviewed annually by the Board of Directors, following a favourable report from the Board Appointments and Corporate Governance Committee, and which was last reviewed on 27 March 2025, as a result of the most recent Board appointments of María Gloria Hernández García and Margarita Salvans Puigbò.

As at 2025 year-end, there were six female Directors, including five female Independent Directors out of a total of ten Independent Directors and one female Other External Director. As of 2024, women represented 40% of the Board of Directors, based on a total of 15 Board members. Based on the current Board composition, which comprises a total of 14 members, female representation has risen to 43% and women account for 50% of Independent Directors, thereby complying with the Directive of the European Parliament and of the Council on improving the gender balance among directors of listed companies and related measures, and doing so ahead of the timeframes established in Organic Law 2/2024 of 1 August on equal representation and the balanced presence of women and men. As indicated above, at the Annual General Meeting of 20 March 2025, shareholders agreed to appoint two female Independent Directors to replace two other departing female Independent Directors, Laura González Molero and Alicia Reyes Revuelta, who ceased to be members of the Board with effect from the date of the Annual General Meeting.

The incorporation of María Gloria Hernández García and Margarita Salvans Puigbò has increased and reinforced the diversity of knowledge and financial experience on the Board. María Gloria Hernández García has an outstanding profile as an economist with executive experience and as an

Board of Directors

31 December 2025

Chairman

Josep Oliu Creus

Deputy Chairman

Pedro Fontana García

Chief Executive Officer

César González-Bueno Mayer

Female directors

Aurora Catá Sala
Ana Colonques García-Planas
María José García Beato
Mireya Giné Torrens
María Gloria Hernández García
Margarita Salvans Puigbò

Male directors

Lluís Deulofeu Fuguet
Manuel Valls Morató
Pedro Viñolas Serra

Lead Independent Director

George Donald Johnston III

Director-General Manager

David Vegara Figueras

Non-Director Secretary

Miquel Roca i Junyent

Non-Director Deputy Secretary

Gonzalo Barettino Coloma

Independent Director with knowledge of the financial sector, capital markets, retail and corporate banking, in addition to her experience in planning and strategy, risk management and control, accounting and auditing, and in corporate governance and sustainability. For her part, Independent Director Margarita Salvans Puigbò has an excellent financial profile with executive and business experience; her financial sector knowledge and experience encompasses retail banking, planning and strategy, risk management and control, and accounting. The new Directors have full capacity to apply their knowledge and skill to the banking business. All of that, combined with the multi-disciplinary and executive capabilities of the new female Directors, has helped to consolidate the collective suitability of the Board of Directors and to maintain its collective ability to challenge the Bank's executives and to perform its overarching supervisory and control functions.

On 27 November 2025, an Other Relevant Information filing addressed to the CNMV was published, indicating that David Martínez Guzmán, Proprietary Director of Banco Sabadell, had tendered his resignation as a member of the Board of Directors by means of a letter addressed to the Chairman, which was conveyed to all members of the Board of Directors at their meeting of the same date. In the letter, Mr Martínez Guzmán states that during these 12 years of tenure on the Board, he has witnessed a transformation of the Bank and expresses his deep gratitude for the resounding success achieved by both the Chairman and the competent teams who have worked for the Bank.

The Banco Sabadell Director Selection Policy of 25 February 2016 (last amended on 12 November 2025) establishes the principles and criteria that should be taken into account in selection processes and also, therefore, in the initial fit and proper assessment and ongoing assessments of the members of the Board of Directors, as well as in the re-election of members of the management body in order to ensure their smooth succession, the continuity of the Board of Directors and the suitability of all its members.

The process for selecting candidates to sit on the Board of Directors and for re-electing existing Directors is governed, among other things, by the diversity principle, fostering the diversity of the Board of Directors in order to promote a diverse pool of members, and ensuring that a broad set of qualities and competences is engaged when recruiting members, to achieve a variety of views and experiences and to facilitate independent opinions and sound decision-making within the Board of Directors.

The Board of Directors should ensure that the procedures for selecting its members apply the diversity principle and favour diversity in relation to aspects such as age, gender, disability, geographical provenance and educational and professional background, as well as any other aspects deemed appropriate to ensure the suitability and diversity of its pool of members. Furthermore, it should ensure that such procedures are free from implicit bias that may entail any degree of discrimination and, in particular, that they facilitate the selection of female directors in the number required to achieve a balanced composition of women and men, in compliance with the percentages set forth in Organic Law 2/2024, of 1 August, on equal representation and balanced presence of women and men.

At its meeting of 12 November 2025 following a favourable report from the Board Appointments and Corporate Governance Committee, the Board of Directors approved a new plan for the renewal of the Bank's Board of Directors, which establishes the foundations and principles to plan appropriately for the renewal of mandates and the succession of the Bank's directors. The new plan covers the period from 2026 to 2029. The previous plan, which covered the period from 2021 to 2024, approved in September 2021, was extended by one year, pursuant to the provision set out in the plan itself.

The Board of Directors has a Lead Independent Director who, in accordance with the Articles of Association, may ask the Board of Directors to call a meeting, request the inclusion of new items on the agenda, coordinate and convene Non-Executive Directors, voice the opinions of External Directors and lead, where applicable, the regular appraisal of the Chairman of the Board of Directors. The Lead Independent Director also coordinates the Succession Plan for the Chairman and Chief Executive Officer, approved in 2016 and revised in January 2025, while compliance therewith is verified each year by the Board Appointments and Corporate Governance Committee, and most recently in January 2026. In practice, the Lead Independent Director also leads meetings with investors and proxy advisors.

To ensure better and more diligent performance of its general supervisory duties, the Board of Directors undertakes to directly perform the responsibilities provided by law. These include:

- those deriving from generally applicable rules on corporate governance;
- approving the Company's general strategies;
- appointing and, where necessary, removing directors of subsidiaries;
- identifying the Company's main risks and implementing and monitoring the appropriate internal control and reporting systems;
- drawing up policies on the disclosure of information and communication with shareholders, markets and the general public;
- setting policy on treasury stock in accordance with any guidelines laid down at the Annual General Meeting;
- approving the Annual Corporate Governance Report;
- authorising the Company's transactions with directors and significant shareholders that may lead to conflicts of interest; and
- generally deciding on business or financial transactions that are of particular importance for the Company.

Board Committees

In accordance with the Articles of Association, the Board of Directors has set up the following Board Committees:

- The Board Strategy and Sustainability Committee.
- The Delegated Credit Committee.
- The Board Audit and Control Committee.
- The Board Appointments and Corporate Governance Committee.
- The Board Remuneration Committee.
- The Board Risk Committee.

The organisation and structure of the Board Committees are set out in the Articles of Association, in the Regulation of the Board of Directors and in the respective Regulations of the Board Committees, which set forth rules for their composition, operation and responsibilities (see corporate website section "Corporate Governance and Remuneration Policy – Regulations of the Committees"), and also develop and supplement the rules of operation and basic functions set forth in the Articles of Association and in the Regulation of the Board of Directors.

The Board Committees have sufficient resources to perform their duties and they may seek external professional advice and information on any aspect of the Institution, having unrestricted access both to Senior Management and Group executives and to all information and documentation, of any kind, held by the Institution on matters within their remit.

With regard to the change in the composition of Board committees, on 20 March 2025, Laura González Molero ceased her role as part of the Board Audit and Control Committee and of the Board Remuneration Committee as a result of her resignation from the position of Director, and Alicia Reyes Revuelta ceased her role as part of the Delegated Credit Committee and of the Board Risk Committee.

At its meeting of 28 April 2025, the Board of Directors agreed, following a report from the Board Appointments and Corporate Governance Committee, to change the composition of the Board Committees. Mireya Giné Torrens was appointed a voting member of the Delegated Credit Committee and ceased her role as part of the Board Appointments and Corporate Governance Committee; Ana Colonques García-Planas was appointed a voting member of the Board Appointments and Corporate Governance Committee; and Pedro Viñolas Serra was appointed a voting member of the Board Appointments and Corporate Governance Committee.

In the interests of the continuous improvement of the Institution's corporate governance, following the incorporation in the Board of Directors of María Gloria Hernández García as Independent Director and pursuant to the assessment carried out by the Board Appointments and Corporate Governance Committee to analyse the composition of the Board Committees, at its meeting of 29 May 2025 the Board of Directors, agreed to appoint María Gloria Hernández García as voting member of the Board Audit and Control Committee and voting member of the Board Risk Committee, in view of her skills and experience in accounting and auditing and in risk management and control. On the same date, Pedro Viñolas Serra ceased his role as part of the Board Audit and Control Committee.

At the Board meeting held on 26 June 2025, following the incorporation of Margarita Salvans Puigbò as an Independent Director, she was appointed a voting member of the Board Audit and Control Committee and voting member of the Board Remuneration Committee, in view of her skills and experience in accounting & auditing, human resources, culture, talent and remuneration.

The Board Appointments and Corporate Governance Committee also appreciated the valuable contribution of business experience of both Directors on these Board Committees. With these appointments a high percentage of women, as the under-represented sex, has been maintained on the Board Committees, and the age diversity of those occupying roles has been reinforced.

The composition and number of meetings of these Board Committees as at 31 December 2025 are shown in the table below:

Composition of the Board Committees

Position	Strategy and Sustainability	Delegated Credit	Audit and Control	Appointments and Corporate Governance	Remuneration	Risk
Chair	Josep Oliu Creus	Pedro Fontana García	Manuel Valls Morató	Pedro Fontana García	Mireya Giné Torrens	George Donald Johnston III
Voting member	Lluís Deulofeu Fuguet	Lluís Deulofeu Fuguet	Ana Colonques García-Planas	Aurora Catá Sala	Ana Colonques García-Planas	Aurora Catá Sala
Voting member	Pedro Fontana García	Mireya Giné Torrens	María Gloria Hernández García	Ana Colonques García-Planas	Margarita Salvans Puigbò	María Gloria Hernández García
Voting member	María José García Beato	César González- Bueno Mayer	Margarita Salvans Puigbò	María José García Beato		Manuel Valls Morató
Voting member	César González- Bueno Mayer (*)	Pedro Viñolas Serra		Pedro Viñolas Serra		
Voting member	George Donald Johnston III					
Secretary Non-voting member	Miquel Roca i Junyent	Gonzalo Baretino Coloma	Miquel Roca i Junyent	Miquel Roca i Junyent	Gonzalo Baretino Coloma	Gonzalo Baretino Coloma
Meetings in 2025	14	38	13	16	11	16

(*) Member for matters of strategy only.



Board Strategy and Sustainability Committee

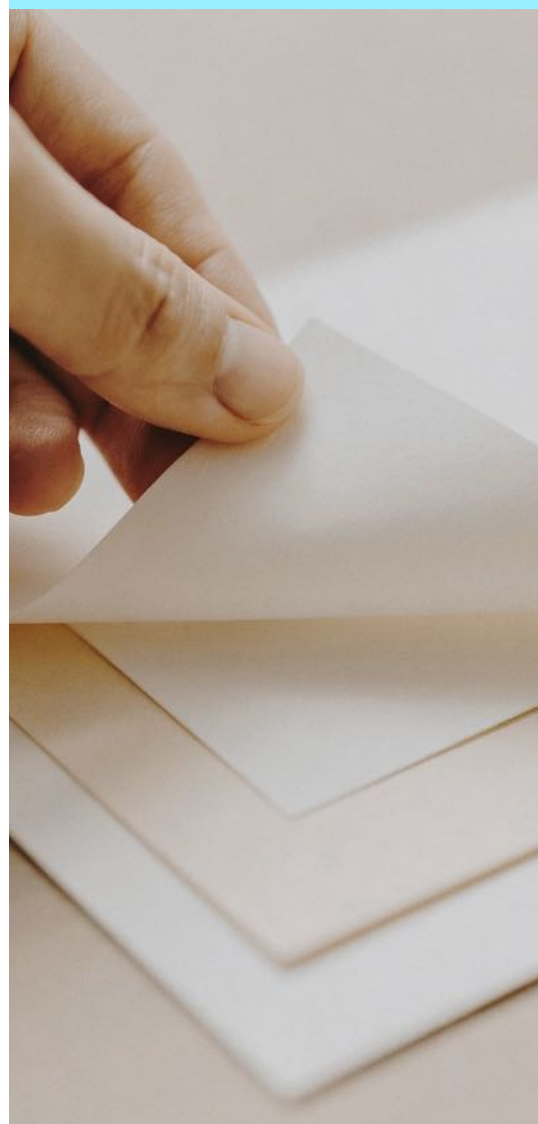
The Board Strategy and Sustainability Committee was set up in 2021 and is formed of five Directors: three Independent, one Other External and its Chair (in the capacity of Other External Director), who is the Chairman of the Board of Directors. On matters of strategy, the Chief Executive Officer takes part in the meetings, with rights to speak and vote, meaning that on such matters this Board Committee has six members.

With regard to strategy, the Board Committee's main responsibilities are to evaluate and propose strategies to the Board of Directors for the Company's business growth, development, diversification and/or transformation, and to report to and advise the Board of Directors on matters related to the Company's long-term strategy, identifying new opportunities to create value and bringing corporate strategy proposals to the Board's attention in relation to new investment or divestment opportunities, financial transactions with a material accounting impact, and significant technological transformations. It is also responsible for studying and putting forward recommendations and improvements to the strategic plans and their updates which may be brought before the Board at any time, and for issuing and submitting a report to the Board on an annual basis containing the proposals, assessments, studies and work carried out during the year.

With regard to sustainability, the Board Committee has the following responsibilities: review the Institution's sustainability and environmental policies; report to the Board of Directors on potential modifications and regular updates of the sustainability strategy; review the definition and amendment of the policies on diversity and inclusion, human rights, equal opportunities and work-life balance and periodically evaluate the level of compliance therewith; review the Bank's strategy for social action and its sponsorship and patronage plans; review and give status reports on the Consolidated Non-Financial and Sustainability Disclosures Report of Banco de Sabadell, S.A. and subsidiaries (Sustainability Report), prior to its review and related reporting by the Board Audit and Control Committee and before its subsequent submission to the Board of Directors; and receive information related to reports, documents or communications from external supervisory bodies with regard to the responsibilities of this Board Committee.

Delegated Credit Committee

The Delegated Credit Committee is formed of five Directors: one Executive and four Independent (one of whom is its Chair). Its main duties are to analyse and, where appropriate, approve credit operations, in accordance with the assumptions and limits established by express delegation of the Board of Directors, and to prepare reports on matters within its area of activity that may be required of it by the Board of Directors. Furthermore, it shall have all the responsibilities ascribed to it by law, the Articles of Association and the Regulation of the Board of Directors.



Board Audit and Control Committee

The Board Audit and Control Committee is formed of four Independent Directors, its Chair being an audit expert. It aims to oversee the effectiveness of the Bank's internal control, internal audit and risk management systems, supervise the process for preparing and disclosing regulated financial information, report on the Bank's annual accounts and interim financial statements, manage relations with statutory auditors, and ensure that appropriate measures are taken in the event of any improper conduct or methods. It also ensures that the measures, policies and strategies defined by the Board of Directors are duly implemented.

Board Appointments and Corporate Governance Committee

The Board Appointments and Corporate Governance Committee is formed of four Independent Directors (one of whom is its Chair) and one Other External Director. Its main duties are to exercise vigilance to ensure a compliant qualitative composition of the Board of Directors, evaluating the suitability and necessary skills and experience of the members of the Board of Directors; escalate proposals for the appointment of Independent Directors and report on proposals for the appointment of the remaining Directors; report on proposals for the appointment and removal of senior executives and members of the Identified Staff; report on the basic terms of the contracts of Executive Directors and senior executives; and examine and organise the succession of the Bank's Chairman of the Board and Chief Executive Officer and, where appropriate, put forward proposals to the Board so that the aforesaid succession may take place in an orderly and planned manner. It should also establish a goal for representation of the under-represented sex on the Board of Directors and develop guidance on how to achieve that goal.

In matters related to corporate governance, it is responsible for informing the Board of Directors of the Company's corporate policies and internal regulations, unless they fall within the remit of other Board Committees; supervising compliance with the Company's corporate governance rules, except for those that fall within the remit of other Board Committees; submitting the Annual Corporate Governance Report to the Board of Directors for its approval and annual publication; supervising, within its sphere of competence, the Company's communications with shareholders and investors, proxy advisors and other stakeholders and reporting to the Board of Directors on these communications; and any other actions that may be necessary to ensure good corporate governance in all of the Company's activities.

Board Remuneration Committee

The Board Remuneration Committee is formed of three Independent Directors. Its main responsibilities are to put forward proposals to the Board of Directors on the remuneration policy for Directors and General Managers, as well as on individual remuneration and other contractual terms of Executive Directors, and to ensure compliance therewith. Additionally, it provides information for the Annual Report on Director Remuneration and reviews the general principles concerning remuneration and the remuneration schemes applicable to all employees, ensuring transparency in remuneration matters.



Board Risk Committee

The Board Risk Committee is formed of four Independent Directors. Its main responsibilities are to supervise and ensure that all risks of the Institution and its consolidated Group are appropriately taken, controlled and managed, and to report to the full Board on the performance of its duties, in accordance with the law, the Articles of Association, the Regulation of the Board of Directors and that of the Board Committee itself.

Chairmanship of the Bank

Article 55 of the Articles of Association stipulates that the Chairman shall perform his duties as a Non-Executive Director. The Chairman is the most senior representative of the Bank and has the rights and obligations inherent in that representation. The Chairman, through the performance of his duties, is ultimately responsible for the effective operation of the Board of Directors and, as such, he represents the Bank in all matters and signs on its behalf, convenes and chairs meetings of the Board of Directors, sets the meeting agenda, leads discussions and deliberations during Board meetings and ensures the fulfilment of the resolutions adopted by the Board of Directors.

Chief Executive Officer

Pursuant to Article 56 of the Articles of Association, the Chief Executive Officer is ultimately responsible for managing and directing the business and will be the Bank's representative in the absence of the Chairman. The Board of Directors shall also delegate to the Chief Executive Officer, on a permanent basis, all the powers that it sees fit from among those that may be legally delegated.



Control units

The Internal Audit unit and the Risk Control & Regulation unit have access and report directly to the Board of Directors and its Committees, specifically, to the Board Audit and Control Committee and the Board Risk Committee, respectively.

The Bank publishes the Annual Corporate Governance Report (which includes detailed information on the Bank's corporate governance arrangements), the Annual Report on Director Remuneration and the Consolidated Non-Financial and Sustainability Disclosures Report of Banco de Sabadell, S.A. and subsidiaries (Sustainability Report), which form part of this Directors' Report, on the website of the Spanish National Securities Market Commission (CNMV) and on Banco Sabadell's corporate website www.grupbancsabadell.com.



1.5 Customers

The customer experience at Banco Sabadell has grown for the third consecutive year in Retail Banking and across all segments in Business Banking.

2025 has been a year of many challenges for the Spanish banking industry, which was faced with an unprecedented socio-political environment that has generated high financial volatility. The return of protectionist policies in the United States and the persistent conflict in Eastern Europe have altered supply chains, raising import costs and therefore affecting investor confidence.

In 2025, Spanish banks faced a scenario in which interest rate cuts reinvigorated the economy and consequently improved the cost of credit for most banking products. In this context, Banco Sabadell has succeeded in providing the Spanish economy with credit capacity, having increased consumer credit by 16% and mortgage lending by 17% in the year. In addition, card turnover and PoS turnover increased by 6% and 2%, respectively, thereby consolidating the Bank's position in payment services.

Year after year, Banco Sabadell remains committed to integrating the values that define its brand, such as professionalism and empathy, into customer relationships, either directly through each of its contact channels or by adapting its products to its customers' needs.

Banco Sabadell has improved its Net Promoter Score (NPS) for the third consecutive year in Retail Banking and in Business Banking where it grew across all segments, improving its position in the SME ranking.

Banco Sabadell has made the customer experience a subject tackled at each of the company's strategic forums, incorporating it in the design of both the products and the services offered to customers. The objective is clear: to offer products and services that can be adapted to customers' needs, combining a wide range of products for each type of customer with an omni-channel experience spanning physical and digital channels.

Knowing customers at every stage of their relationship with Banco Sabadell is crucial, which is why new methodologies have been developed using artificial intelligence, allowing the Bank to listen to what customers are saying, to measure and determine the main reasons for customer satisfaction and dissatisfaction, and to ascertain how near or far it is from meeting customers' expectations. The ultimate goal is to implement courses of action that make it possible not only to improve customers' experience but to also try to surpass their expectations.

These methodologies enable processes to be transformed and adapted to customers' needs, thereby improving their experience.

Measuring customer experience

Understanding the behaviours and needs of customers through their opinions is key for Banco Sabadell.

Measuring customer experience involves understanding the market, consumers and customers, using a number of different qualitative and quantitative analytical methodologies to that end.

Qualitative analysis

In order to better understand the environment and the customers within it, different qualitative studies and research projects are undertaken using different methodologies. The aims pursued include:

- Listening carefully, actively and constantly to what customers have to say, so as to ascertain how they experience their relationship with the Bank at different touchpoints.
- Understanding the concerns, worries and attitudes of consumers and their current and future needs.
- Identifying the more emotional and less obvious side of consumer decision-making.
- Defining *ad hoc* value propositions for each type of customer.

A variety of techniques are used, ranging from conventional in-depth interviews and segment-specific focus groups to more innovative methodologies based on behavioural economics and the detection of the deepest emotions and motivations of consumers. Currently, various artificial intelligence tools help to address customer opinion from a broader perspective, allowing real-time analysis of their opinions on products and services and, therefore, enabling a very rapid response capacity as these tools help to identify customer needs. This makes it possible to respond to potential problems and, at the same time, helps to identify relevant solutions, enabling the Bank to offer products and services that meet customers' current expectations.

Quantitative analysis

Banco Sabadell also analyses the experience of its customers through quantitative studies. Some of these are more closely related to the traditional concept of customer satisfaction, while others incorporate more emotional aspects of customers, to make the organisation more aware of the importance of considering customers in its decision-making, so as to make meaningful improvements.

1. Net Promoter Score (NPS)

The NPS, considered to be the benchmark indicator in the market used to measure customer experience, allows Banco Sabadell to be compared against its peers and even against companies in other sectors, both nationally and internationally.

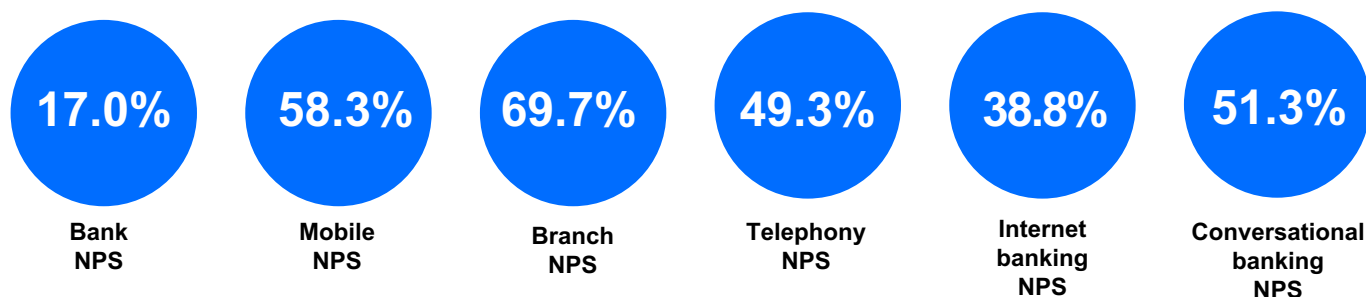
Banco Sabadell Spain's position in the ranking



Source: Accenture benchmarking of major Spanish financial institutions (2025 data).

In light of the digital transformation, the measurement of customer satisfaction in digital channels has become more important. In this respect, it is worth noting the NPS for the telephony channel, which increased to 31% (an increase of 12 percentage points compared to 2024).

TSB data



Source: TSB internal NPS tracking studies. The measurement methodology has been changed from a 13-week rolling score in 2024 to weekly measurement with an annual cumulative score in 2025.

The results obtained during 2025 confirm that Banco Sabadell is on the right track.

Stemming from the focus on always offering the best possible experience to each customer group, one of the Bank's objectives is to continuously improve its NPS, both in terms of Key Performance Indicators (KPIs) and in terms of its position compared to other banks.

2. Satisfaction surveys

The overall customer experience measurement and management model of Banco Sabadell Spain is based on different indicators obtained from more than 1 million surveys and at more than 20 touchpoints. The results of the various surveys allow it to ascertain the level of satisfaction of its customers and to identify areas where specific processes and contact channels could be improved. For each of these surveys and studies, the Bank sets itself improvement targets and continuously monitors progress.

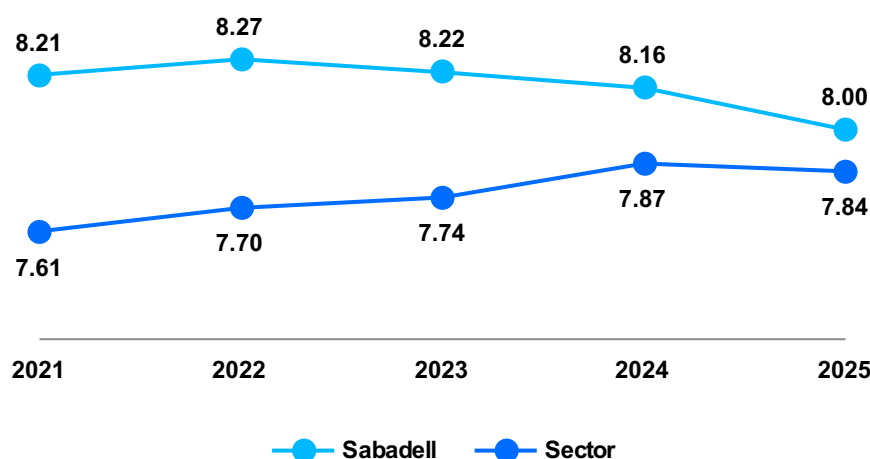
In a multichannel environment, the surveys related to specialised customer service, both in branches and in the digital sphere, are becoming increasingly relevant. For Banco Sabadell, the use of digital channels is a moment of truth, so it has focused its efforts on measuring customer satisfaction and the improvement of the customer experience with, among other things, online banking for individuals (BSOnline Particulares) and for businesses (BSOnline Empresas), as well as the mobile app. The excellent results of the internal NPS survey are particularly noteworthy, with the NPS in the retail segment improving by 5 percentage points.

3. Branch quality surveys

In addition to analysing customer perceptions, Banco Sabadell also carries out objective studies using approaches such as the mystery shopping technique, where an independent consultant poses as a buyer to assess the quality of service and the commercial approach to potential customers followed by the sales team.

EQUOS RCB (Stiga) is the market benchmark survey that evaluates the quality of service offered by Spanish financial institutions through the mystery shopping technique. Banco Sabadell ranks among the leading players and continues to stand out in terms of quality with respect to the sector.

Level of service quality



Customer Care Service (*Servicio de Atención al Cliente*, or SAC)

The Customer Care Service of Banco de Sabadell, S.A. conforms to the provisions of Ministry of the Economy Order 734/2004 of 11 March, the guidelines issued by the European Banking Authority (EBA) and the European Securities Market Authority (ESMA), and the Banco Sabadell regulation for the protection of customers and users of financial services. The most recent update of that regulation was verified by the Bank of Spain on 14 April 2025.

In accordance with its Terms of Reference, Banco Sabadell's SAC handles and resolves complaints and claims received from customers and users of Banco Sabadell's financial services and those of the institutions associated with it: Sabadell Asset Management, S.A., S.G.I.I.C. Sociedad Unipersonal, Urquijo Gestión, S.G.I.I.C, S.A. and Sabadell Consumer Finance, S.A.U.

In addition, the SAC can issue recommendations or suggestions derived from the analysis of complaints and claims received by the SAC.

In order to ensure its decision-making autonomy, the SAC is independent of the Bank's operational and business lines and it has the necessary resources to deal appropriately with complaints and claims, under the principles of transparency, independence, effectiveness, coordination, speed and security. The SAC also has sufficient authority to access all the necessary information and documentation in order to analyse each case, and the operational and business units are obliged to cooperate diligently in this regard. Banco Sabadell's regulation on the protection of customers and users of financial services ensures compliance with the above-mentioned requirements.

In 2025, 63,164 complaints and claims were received: 62,203 processed in the first instance by the SAC, 216 through the Customer Ombudsman (which, since 31 January 2025, is no longer designated by the Institution), 712 through the Bank of Spain and 33 through the CNMV. This year, 62,966 complaints were managed, of which 51,953 complaints were accepted for processing and resolved, 10,834 complaints were not accepted for processing as they did not meet the requirements set out in the Terms of Reference, and 179 complaints were pending resolution by the regulator.

See Note 42 to the consolidated annual financial statements for further details.

Multichannel strategy

During 2025, Banco Sabadell has consolidated its multichannel strategy, mainly thanks to the development of new capabilities in digital and remote channels, while various actions have been taken to improve the current digital customer onboarding process. This has cemented Banco Sabadell's position as one of the lead players in terms of onboarding at the domestic level, in a highly competitive environment.

All of this has made it possible to meet the targets for newly onboarded customers set by the Group at the start of the year.

In parallel, customer-focused actions have been intensified, encouraging early account activation to fast-track their engagement with the Institution. These actions are very much focused on covering the customer's needs in the early stages of their relationship with the Bank, by offering them assistance from the very beginning, whether digitally or remotely.

In addition, commercial actions aimed at attracting direct salary deposits and activation of the Bizum payment system were launched, which have substantially increased the proportion of domiciled salaries among newly acquired customers, as well as the number of customers using Bizum.

This was supported by the consolidation of several teams that provide support and advise customers in matters that may require greater specialisation and expertise, thus enabling customers to make the best decisions in personal finance matters.

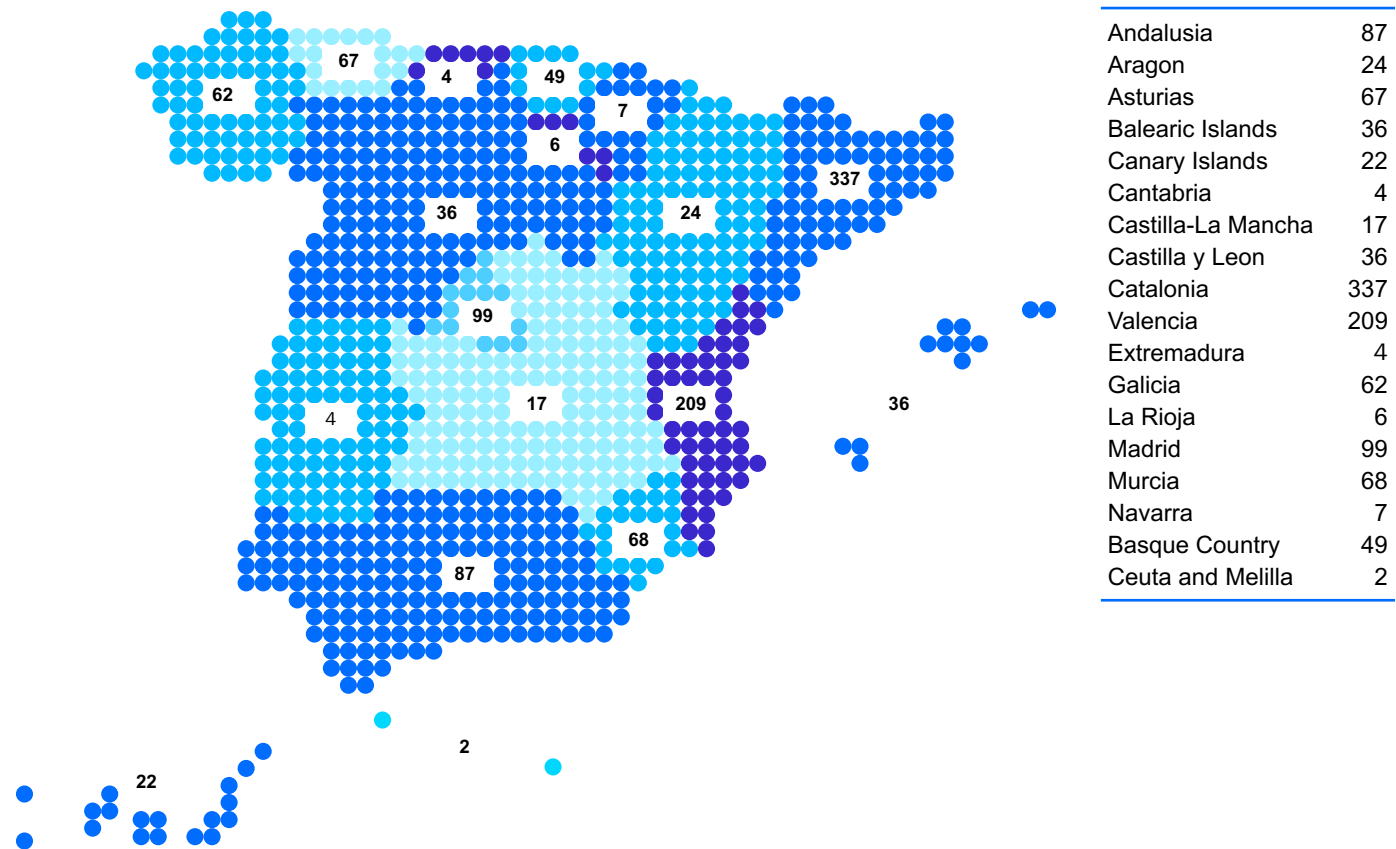
Branch network

The Group ended 2025 with a network of 1,336 branches, representing a reduction of 14 branches with respect to 31 December 2024.

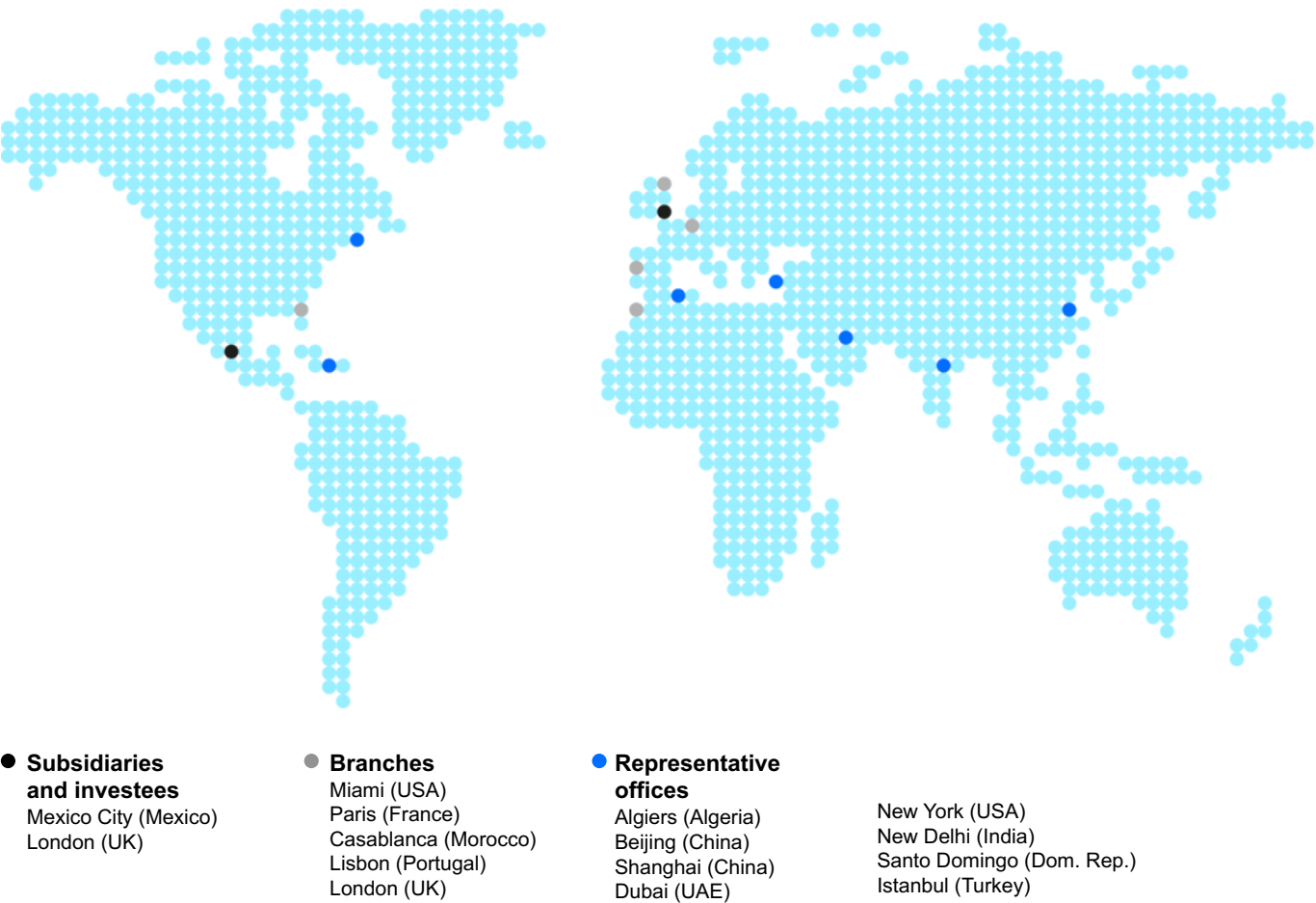
Of the total number of branches and offices in Spain of Banco Sabadell and its Group, 841 operate under the Sabadell brand (including 26 Business Banking branches and 2 Corporate Banking branches), 62 operate as SabadellGallego (3 Business Banking branches), 61 as SabadellGuipuzcoano (5 Business Banking branches), 85 as SabadellHerrero in Asturias and León (3 Business Banking branches), 80 operate as Solbank, 7 as SabadellUrquijo, and 200 branches make up the international branch network, including 175 corresponding to TSB and 12 to Mexico.



Number of branches and offices, by autonomous community



Banco Sabadell in the world



ATM network

Banco Sabadell ended the year with a fleet of 2,346 ATMs in Spain, of which 1,736 are in-branch and 610 are out-of-branch. Compared to 2024, the number of ATMs has decreased by 0.2%, mainly due to branch closures.

In terms of ATM transactions carried out in 2025, the downward trend observed during the previous year continued, with approximately 66 million transactions carried out with a value of 22 billion euros, which is a decrease of approximately 9.3% in the total number of transactions and a drop of 5% in the value of those transactions.

Deposits and withdrawals were the most commonly used types of transactions and, in both cases, there was a slight decrease compared to the previous year.

The main goals for 2025 were to improve the overall availability of the fleet, modernise the technology by upgrading around 580 ATMs and by developing software adapted to the European Accessibility Act (Law 11/2023 on the transposition of EU Directives, which transposed Directive 2019/882), enhance the customer experience and review the appearance and cleanliness of ATMs.

Companies Hub (*Hub Empresa*)

Companies Hub is Banco Sabadell's business networking centre, an initiative aimed at customer and non-customer businesses alike, which seeks to offer them high-value content and connections to help them deal with the challenges they may face, now and in the future, and to explore opportunities for their business ventures.

This platform reinforces Banco Sabadell's position as the financial institution that best understands the challenges of transformation faced by businesses today, and as the financial partner that is best equipped to support them in their business journey.

The Companies Hub comprises:

- A digital environment with activities organised by the Bank's experts and external professionals. In 2025, 117 activities took place (41 webinars, 63 in-person events live-streamed from the Companies Hub in Valencia, and 13 in-person events streamed from other regions), in which over 18,000 professionals took part. The recordings also had more than 28,000 post-event viewings.
- An important physical space for companies in the heart of Valencia, with workspaces for business meetings. In 2025, 210 events took place there (the key events that were live-streamed, as mentioned above, plus other collaborative events and instances where the space was leased out to business entities), in which more than 11,000 people took part in face-to-face encounters and were able to enjoy some excellent networking opportunities. In addition, customer businesses made 1,026 reservations of meeting rooms at the Hub (with 3,972 participants using them).

2025 saw consolidation of the strategy of holding face-to-face Companies Hub events in other territories, with a total of 13 sessions taking place: 6 in Madrid, 6 in Barcelona and 1 in Oviedo.

In terms of communications, 15 articles and press items and 62 short videos for social media were produced, generating 312 news items in the media, including 290 online and 22 in the print media, reaching a wide audience in the press and on social media.

A new space on the Companies Hub website has been created, incorporating information about awards and events held as part of the Banco Sabadell Company of the Year Awards (*Premios Empresa del Año*). These award ceremonies are held annually throughout the territory and are supported through dissemination in the press media by *Prensa Ibérica*.

All of the activities are designed based on the key thematic areas agreed on by the Editorial Committee which meets at the start of the year. This year, the “Inspiring stories” (*Historias inspiradoras*) cycle of conferences was particularly interesting, with the participation of Taxus Medio Ambiente, Veritas, Logifruit and Port Hotels.

New topic-based series of sessions have been launched, including one on Business Financing, one on the Family Business and another on Franchises, which add to the established ongoing series on Artificial Intelligence, Internationalisation, and Sustainability in the Business.

Additionally, non-series sessions have been organised to address current topics, such as the macroeconomic and geopolitical environment, ICO MRR credit lines, and new developments in electronic invoicing. Meetings have also been held to focus on specific sectors, such as tourism and the third sector.

The overall number of participants this year was 29,579 (58,205 if video views and events available to companies via the internet are added). Professionals from the Bank have participated as speakers at 66% of these events.

Participants at these events continue to rate the activities very highly, with an average overall rating of 9.21 out of 10 (3,559 surveys answered).

Direct Branch

Telephone helpline

In 2025, efforts were focused on ensuring that the telephone service is accessible and on the customer experience offered, pursuing two key goals: firstly, to resolve issues on the first call, and secondly, to obtain the customer's recommendation of the customer care service.

This year, 3.36 million calls were received, of which 3.18 million were handled, indicating a Service Level Agreement (SLA) fulfilment rate of 95%.

In terms of the perceived customer experience, actions were taken to improve the First Call Resolution (FCR) indicator, as a result of which the resolution rate at year-end was 83%, having improved by two percentage points compared to the previous year.

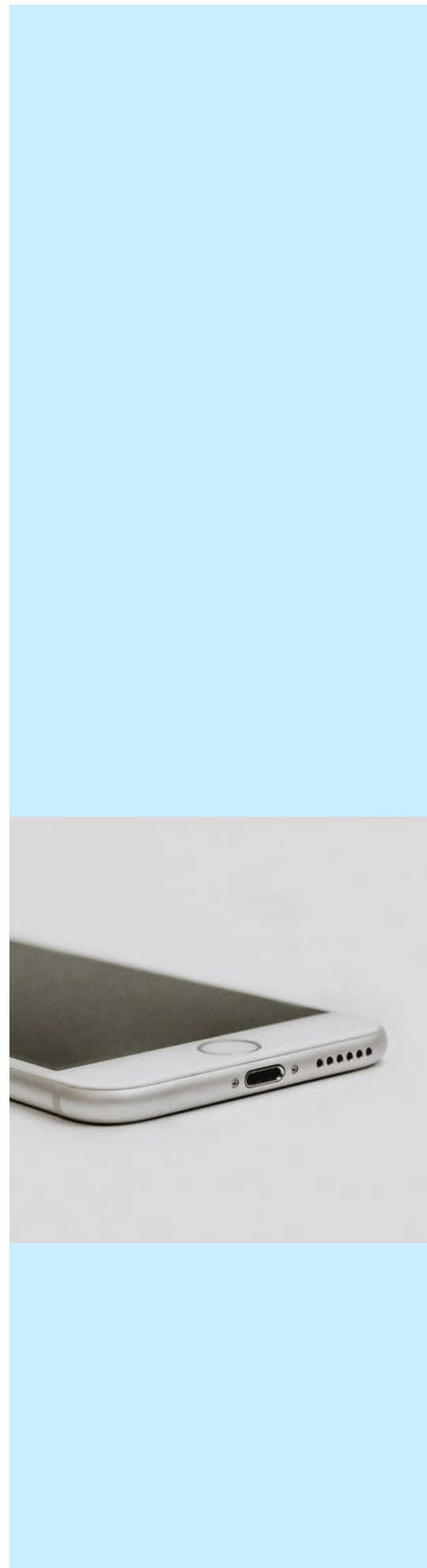
With regard to customer recommendations of the telephone service, these have remained at very good levels over the year, ending with an annual cumulative percentage of 60% (CXI), seven percentage points higher than the previous year.

Text-based customer care

Banco Sabadell is active on five social media channels: X, Facebook, LinkedIn, YouTube and Instagram, with 20 different profiles at the national level, positioning itself as one of the financial institutions with the best digital reputations in the sector.

One of the most prominent KPIs in global social media ranking reports is the SLA fulfilment rate, which reached 99% in 2025.

Another text-based customer care service that Banco Sabadell offers is its web chat service, which this year recorded increased usage of 27% in the number of chats and 14% in the number of customers compared to 2024. This is further proof of the growing importance of this service as the



preferred channel of interaction among our digital customers, a group whose number continues to steadily grow with each passing year.

Some of the most notable improvements introduced in the chat channel include the simplification of processes, quality responses, personalised attention and the incorporation of new chatbot autonomy features, to avoid having to divert customers to other channels such as the telephony channel or their local branch. All these actions have resulted in an improved query resolution rate (100% increase compared to 2024) and an improved NPS (10 percentage points increase compared to 2024). The resolution capacity is expected to continue improving throughout 2026.

Business customer care and direct channels

Following the segmentation of the telephony channel, carried out in October 2024, which differentiated customer care for retail and business banking customers, in 2025, the customer care unit for self-employed persons, small businesses and SMEs (*Atención a Autónomos, Negocios y Pymes*, or ANA) was consolidated as the specialist unit in this segment. The volume of calls received levelled out at an average of 77,000 calls per month, with enquiries related to files and reverse factoring services being the most frequently asked questions (43%), followed by requests for help with BSONline (18%).

The Customer Care Level (*Nivel De Atención*, or NDA) is one of the service's main KPIs, reaching 94% in 2025, having increased by 2 percentage points compared to 2024. One of the priorities in 2025 was to improve the NPS of the telephony channel. In this respect, the Bank successfully positioned itself among the top players compared to its peers and was ranked in first place by self-employed customers in the first two editions of the survey. This improvement is also reflected in internal indicators: the Customer Experience Index (CXI) increased by more than 20 percentage points compared to 2024 and the resolution of queries improved by 8 percentage points, reducing the number of referrals to branches. These outcomes are a direct result of various initiatives implemented over the year, the most notable among them being:

- Application of the development, listening, growth and opportunity (*Desarrollo, Escucha, Crecimiento y Oportunidad*, or DECO) programme.
- An intensive and product-specialised training plan, aimed at segment specialisation.
- Increased autonomy and improvements in processes, which have led to greater management efficiency.

The Customer Care Space, launched in November 2024, was consolidated in 2025 as the written-format channel for self-employed customers, small businesses, SMEs and corporates (841,000 customers) with around 500,000 visits. From January, the monthly volume of tickets grew from 1,800 to 14,000 and remained stable throughout the year, with issue resolution in excess of 96%.

In the preferential services (SAP for Private Banking and SAPE for companies with turnover of more than 2 million euros), activity increased by 59% and 15%, respectively, in 2025 compared with 2024. The Customer Care Level (NDA) reached 94% for SAPE services and 95% for SAP services in 2025. The NPS improved by more than 14 percentage points among companies with turnover of 2-10 million euros (2nd place in the sector) and by more than 11 percentage points among companies with turnover above 10 million euros (3rd place). These improvements are reflected in the CXI, which is above 61% in both services.



The growth in call volumes is due to:

- Segmentation of telephone activity by customer target, which means that calls from customers in the Private Banking, Wealth Management, SMEs and Large Corporates segments are now managed by preferential teams, thereby freeing up the branches from service tasks.
- The promotion and dissemination of the service by branches and units, thanks to the team's high level of expertise and resolution capacity, particularly in time-critical and high-value cases.
- Another significant factor was the redirection of calls from bankers' mobile phones to SAP, in order to free bankers from operational or service tasks.

In SAPE services, aside from the telephone channel, the following services are managed:

- The digital support mailbox, which provides support and assistance to companies with queries regarding their online operations and procedures or with incidental issues relating to files, with 100% SLA achieved in the resolution of issues within a maximum of 72 hours.
- Email support for Corporate Banking customers.
- Support provided to business operations centres regarding customer requests for assistance with online banking or file management.

Direct channels

This service manages files via four communication channels: Editran, SFTP, EBICS and Swiftnet. These channels make it possible to perform secure and standardised operations, optimising customer management time without need for direct access to electronic banking. The rules and processes are automatically sent in a protected environment, in compliance with security and confidentiality requirements.

The KPIs for this service are excellent, in terms of both query resolution (95%) and customer care (99%).

In 2025, more than 20 improvement projects were put in place, including automated contract fulfilment, which has enabled a significant reduction of time spent on in-branch management.

Digital transformation and customer experience

The digitalisation of consumer habits continues to transform the banking sector. Interactions that previously took place in-branch are increasingly moving over to digital channels. Banco Sabadell is committed to offering its customers an end-to-end experience: fast and secure digital solutions for day-to-day banking and face-to-face customer care at important times. In recent years, the Group has reinforced its technological infrastructure and created Sabadell Digital, combining talent and capabilities to accelerate technological transformation and the implementation of artificial intelligence. On the strength of this, some key developments were consolidated in 2025, including:

- Digital onboarding: now accounts for more than 53% of retail customer acquisition.
- Digital customers: the number of customers active on digital channels in the last three months reached 68% of the total retail customer base. In addition, around half of the retail customer base have their banking needs met using the digital customer service model.
- Digital loans: approximately 90% of loans to retail customers are arranged via remote channels, maintaining the rate and efficacy achieved in the previous year.

These initiatives reinforce the Group's strategy of offering a more flexible, secure and customer-focused service, contributing to efficiency and the creation of sustainable value.

Sabadell Digital

Sabadell Digital has been consolidated as a key asset in Banco Sabadell Group's technological strategy, combining specialised human resources with the intangible assets that underpin the Bank's digital transformation. Its mission is to develop advanced technological solutions to accelerate digitalisation and guarantee competitiveness in an increasingly demanding financial environment.

Sabadell Digital's contribution hinges on three key strategic pillars. Firstly, the management of technological talent, which ensures the attraction and retention of highly specialised profiles, whilst promoting innovation through a culture and conditions geared towards digital development. Secondly, the provision of technological services across the entire Group, pooling technological capabilities and ensuring efficiency and scalability in the delivery of solutions. Lastly, the management of technological assets, optimising their use and ensuring their alignment with strategic objectives.

Since its creation in 2023, Sabadell Digital has driven forward initiatives to strengthen its talent base and technological capacities. In 2025, developments included the hiring of critical profiles for innovation and the consolidation of an operating model that reinforces the Group's technological resilience and flexibility, thus contributing decisively to the digital transformation and the creation of sustainable value.

Main deliveries in 2025

Digital onboarding

In 2025, Banco Sabadell reinforced its digital customer acquisition strategy through the development of its online onboarding process, consolidating it as a key pillar underpinning commercial efficiency and the customer experience. The main improvements introduced include:

- Incorporation of the self-employed customer segment, enabling online account and loan applications and digital operations for this customer group.
- Activation of the companies profile directly from the website and from the app, integrating retail and business banking operations in a single digital access point.
- Preparation for the onboarding of credit cards, scheduled for rollout in the first half of 2026, thus broadening the scope of the digital process.

Thus, Banco Sabadell is consolidating the digital channel as a strategic lever to increase efficiency, reduce operating costs and improve the value proposition, contributing to the Group's competitiveness and its sustainable growth.

Transformation of the mortgage model

Another decisive step was taken in 2025 in the digitalisation of the mortgage lending business, reinforcing the Group's value proposition in a segment that is key to its profitability. The strategy focused on two critical areas: improving the customer experience and optimising operational efficiency. To that end, the mortgage processing service has been redesigned with new agreements that incorporate more demanding service levels and additional obligations, ensuring higher quality and

proactive continuous improvement, underpinned by advanced technological capabilities and sectoral best practice.

In addition, a mortgage management tool was rolled out, designed to enhance the specialised team's productivity and increase its conversion rate, reducing wait times and operating costs. In parallel, preparation began for integration of the mortgage application process with BSOOnline and with the new mobile app, which will make it possible to offer an omni-channel experience that is more fluid and closely aligned with customers' digital expectations.

These initiatives allow the Group to digitalise critical processes, improve efficiency and strengthen its competitiveness in mortgage products, with a direct impact on the sustainability of growth and future profitability.

Digital loans

Digital loans are one of the main pillars of the sales model transformation in the retail banking customer segment.

In recent years, the Bank has made huge efforts to turn digital channels into the main source of consumer loan sales.

In 2025, retail loans taken out using remote channels represented 90% of total loans taken out.

This year, the Bank continued to improve the process to increase conversions:

- Optimising the pre-approved loan application process to increase the conversion rate through an improved customer experience.
- Improving the reactive lending stream, simplifying the process and improving the design.

Service programme

The aim of the service programme is to offer customers the best experience, allowing them to perform banking operations wherever and whenever needed, thereby reinforcing the efficiency and resilience of the operating model. The transformation carried out in 2025 has had a significant impact on the optimisation of processes and on the improvement of the digital experience.

Previous years' efforts to free up capacity in the branch network continue, to allow greater focus on higher value-added operations. Similarly, calls to Direct Branch have been reduced by 12%, thanks to the broader scope of digital self-service functionalities and the incorporation of intelligent tools that facilitate the resolution of queries in real time. The operating model has been bolstered with improvements to customers' day-to-day operations, including functionalities such as the new semantic search feature and improvements in the identification of purchases via geolocation, which increase transparency and enhance customers' control over their finances.

The digital experience has also developed to maintain positive results. The Banco Sabadell app has incorporated improvements that have boosted customer satisfaction, reflected in the sustained NPS indicator, with average scores of 50%. These actions consolidate the Group's strategy of offering a more flexible, secure and customer-focused service, contributing to efficiency and the creation of sustainable value.

Marketing tools in digital processes

Content personalisation on the digital channels has been consolidated as a key element for improving the conversion rate and increasing the volume of digital sales. In 2025, Banco Sabadell further developed the integration of marketing tools on its digital platforms, especially in the Banco Sabadell app, with the aim of offering products and services

tailored to the profile and needs of each customer. This development allows content to be segmented by target group and optimises the customer experience, boosting commercial efficiency and user satisfaction.

The Group has also boosted the use of these capabilities for the continuous improvement of commercial and service-led processes, reinforcing research methodologies such as A/B testing and personalisation tools that enable changes in usability and navigation to be validated before they go live. This approach reduces timeframes and costs, ensuring that the improvements implemented bring real value to the customer and contribute to the profitability of the business. With these improvements, Banco Sabadell consolidates a strategy that combines technology and marketing to maximise digital conversion and strengthen its competitive position.

Evolution of the design system: Galatea

The evolution of the Galatea design system was a key component of the digital transformation strategy in 2025. This structure allows design criteria and experience to be unified across all of the digital channels, ensuring consistency, scalability and speed in the development of new functionalities. During the year, Galatea was applied in critical processes such as applications for pre-approved loans and the optimisation of reactive lending streams, reducing process friction and improving usability.

This evolution reinforces the Group's capacity to accelerate the delivery of digital solutions, improve the customer experience and reduce development costs, consolidating a technological base that supports future growth and competitiveness in an increasingly digital environment.

File management

File management is an essential element in the day-to-day management of companies and it forms a critical point in the Group's digitalisation strategy. Improvements were carried out in 2025 with the aim of optimising the customer experience and enhancing file management efficiency, both in BSONline and in BSMovil. These improvements have made it possible to simplify queries and file generation, reducing issues and increasing the speed and flow of digital operations.

The development of these capabilities reinforces the strategic objective of boosting transactionality through digital channels in the business banking segment, reducing dependency on manual processes and improving traceability and security. By doing so, Banco Sabadell moves towards a more scalable and efficient business model, which contributes to its competitiveness and to the creation of value for customers and shareholders.

Customer Care Space

In 2025, the Customer Care Space has become a key channel to improve digital interactions between the Bank and its customers in the self-employed, small businesses and SMEs & corporates segments. This space enables secure and fluid communication, integrating functionalities that facilitate the management of commercial relationships in digital environments. Through BSONline, BSMovil and WhatsApp, customers can chat with the customer care teams, exchange documentation, find their branch or relationship manager's contact details, and request appointments without having to make a trip.

The development of the Customer Care Space reflects the Group's strategy of offering an omnichannel experience that combines efficiency and proximity, reducing process friction and improving commercial productivity. This model contributes to strengthening the value proposition for business customers, whilst optimising operating costs and increasing the Bank's capacity to provide personalised customer assistance in an increasingly digital environment.

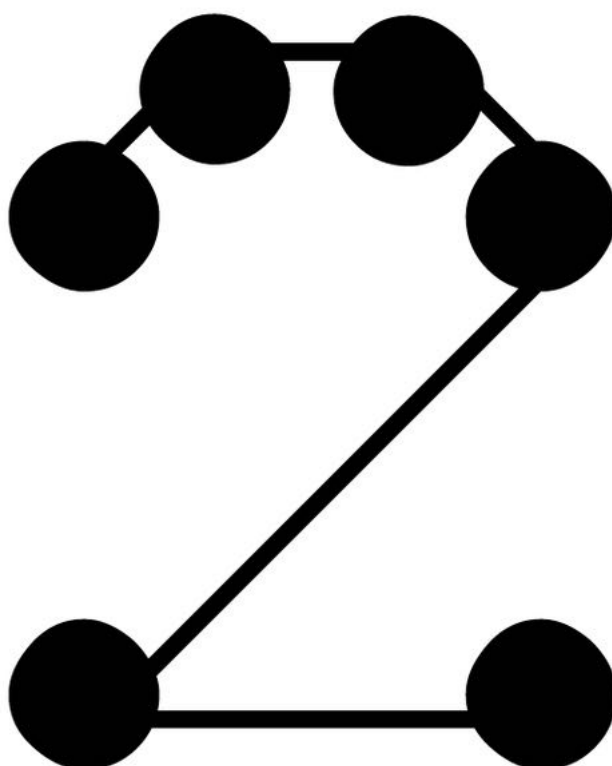
Digital applications and services for business banking customers

This year, Banco Sabadell has consolidated the digitalisation of loan applications and services for companies, self-employed professionals and small businesses, extending remote access to key products such as business financing, corporate cards, factoring, reverse factoring, and savings and investment solutions. This development allows customers to manage their banking business independently and securely, reducing dependence on face-to-face channels and improving the Bank's operating efficiency. In this way, an omnichannel experience is offered that combines speed and personalised interactions, boosting the Bank's competitiveness and profitability in the business segment.





Economic, sectoral and regulatory environment



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Economic, sectoral and regulatory environment

2.1 Economic and financial environment

The Trump administration's agenda was a major factor behind the main events that took place in the economic and financial environment during 2025.

In 2025, the economic and regulatory agenda of the US administration went a considerable way in shaping the global environment. In terms of trade, the United States significantly raised its effective tariffs imposed on the rest of the world. Tariff pressures eased somewhat after bilateral agreements were signed with various regions.

On the institutional plane, the decisions made by the United States pointed towards a reconfiguration of the rules of the game, with more government interference in traditionally independent bodies and, externally, with less support for multilateral agreements and institutions.

In the financial markets, this framework raised occasional doubts about the role of US government bonds as a safe haven asset and of the US dollar as the world's primary reserve currency. At the same time, the sustainability of the public finances continued to be a cause for concern, not only in the United States, but also in certain European economies such as France.

On the geopolitical front, instability persisted, with the conflicts in Ukraine and the Middle East no closer to being resolved. In addition, the publication of the new United States National Security Strategy in December revealed the country's desire to have more influence in the Western hemisphere.

Despite this backdrop, economic activity and the markets showed remarkable resilience. Contributing factors included the boost associated with the deployment of artificial intelligence, expectations of interest rate cuts, as well as sound corporate earnings, all of which helped risk assets to perform well.

The Spanish economy continued to post robust growth of 2.8% per annum, amply outperforming the wider Eurozone. This performance was underpinned by population growth, low exposure to US tariffs, progress made in rolling out NGEU funds, and the pass-through of lower interest rates to households and firms.

Political and geopolitical environment

Geopolitical instability continued to rise in 2025, although its direct impact on economic activity and the financial markets was limited. The main sources of tension were the Middle East, Ukraine, and relations between China and Taiwan, whilst the United States exerted more influence in the Western hemisphere.

In the Middle East, Israel launched direct and sweeping attacks on Iranian nuclear installations, with support from the United States. The episode caused an initial rebound in oil prices, which was quickly corrected once it became clear that Iran's response was one of moderation. This conflict, combined with weakened pro-Iranian militia in the region, reduced Iran's geopolitical influence. In the meantime, Israel continued to attack Gaza, increasing its military occupation of the Strip and gaining further control of the West Bank. Although Trump and the Israeli Prime Minister agreed on a peace plan for Gaza, its implementation soon stalled, with no definitive cease-fire and with no agreements with Hamas. Israel's gains in the region sounded alarm bells for states in the Persian Gulf, above all because it caused them to question whether the United States will be able to continue guaranteeing their security. Against this backdrop, Saudi Arabia signed a mutual defence pact with nuclear-armed Pakistan as a preventive measure.

Geopolitical instability was still very much present in 2025, with the conflicts in Ukraine and the Middle East no closer to being resolved.

In Ukraine, the US administration failed to make any significant progress to resolve the conflict. Russia intensified its attacks to levels not seen since the start of the war, while Ukraine built up its capacity to damage critical Russian infrastructures. Russia's struggles to make front-line gains and the country's depleted economy resulted in more intensive use of hybrid warfare tactics, including cyberattacks and drone incursions in Europe, which increased the risk to the security of Europe and NATO.

In response, NATO agreed to increase its defence spending target from 2% to 5% of GDP within the next ten years. The European Union, for its part, came closer to defining a common defence strategy to make it easier to fund and implement strategic investments. The United States imposed new sanctions on Russia's energy sector and introduced additional tariffs on India, as this country is one of the biggest buyers of Russian oil.

Aside from these conflicts, there were also ongoing tensions between China and Taiwan, with multiple military drills launched around the island and measures designed to exert economic pressure. At the end of the year, the US administration also took military action against Venezuela, allegedly to combat drug trafficking.

In terms of domestic policy, the United States took measures that raised concerns about the country's institutional quality and the separation of powers, and which affected universities, the media and the judiciary. Troops from the National Guard were also deployed to Democrat-controlled cities in order to contain protests linked to migration policies and matters of security. As for foreign policy, the Trump administration focused on scaling back its contribution to international agreements and international development programmes.

In Europe, decisive progress was made on strategic matters, such as those related to defence, which eased concerns over the impact of far-right conservative governments, such as Italy's, and which arguably helped to build bridges with the United States. Despite voting intention polls showing a surge of support for far-right parties, no changes of government took place in either Germany or France. Germany held snap elections that returned the Conservatives to power in coalition with the Social Democrats, while France continued to have a fragmented parliament that struggled to push through structural reforms. After the State Budget for 2026 failed to secure approval, the country had no choice but to extend its existing Budget set for 2025.

Economic activity and inflation

In 2025, the uncertainty generated by the US trade policy and by rising geopolitical tensions shaped the course of global economic activity. Even so, the direct impact of the new tariffs was more moderate than anticipated, thanks to the bringing forward of trade flows, the contained response to the tariffs adopted by the rest of the world, the boost associated with artificial intelligence, and the resilience of trade between emerging economies.

The United States raised the effective tariff to over 10%, from the previous year's rate of below 2.5%. The tariff structure combined a baseline global tariff of 10%, tariffs of 15% for the EU, Japan and South Korea, and tariffs ranging from 20% to 50% for the remaining countries, although with exemptions on certain products of strategic importance to the United States. The United States also set sector-specific tariffs of 25% on the automotive industry (15% in the case of the EU), 50% on steel, aluminium and copper, and of 10-20% on timber, lumber and their derivative products. Lastly, investigations began into the possible imposition of tariffs on sectors such as semiconductors and pharmaceuticals. Trump also imposed politically-driven tariffs, as in the case of Brazil and India.

In terms of technology, the tech war between United States and China intensified. The United States introduced new export controls on advanced AI chips to China, while China in turn threatened to set export controls on critical mineral shipments. Although tensions eased off after the two powers agreed a truce in November, the structural confrontation in relation to technology continues.

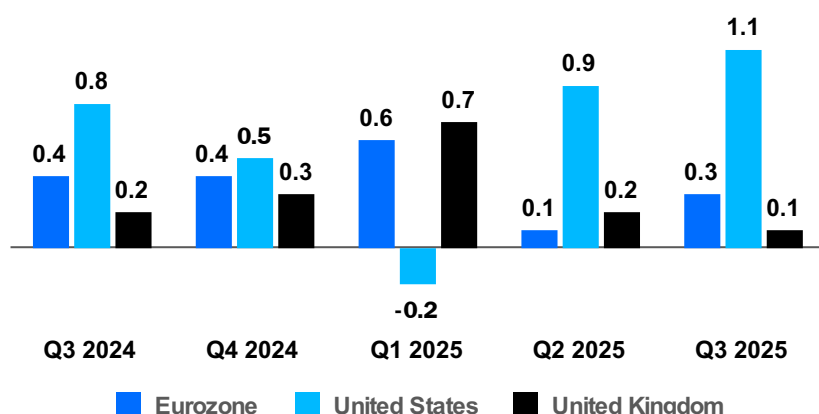
The increase in tariffs imposed by the United States had a limited impact on the economy in 2025.

In the Eurozone, the heightened trade uncertainty affected GDP performance. GDP spiked in the first quarter as exports to the United States were brought forward, before subsequently posting more moderate growth when those trade flows normalised. Germany stood out after it approved a huge fiscal stimulus package that boosted growth, allowing the country to record economic growth for the first time since 2022.

In the United Kingdom, economic activity showed some resilience in the first half of the year. Lower interest rates revitalised the real estate market and reinvigorated borrowing, although the tax situation remained a cause for concern. In the United States, the economy continued to post solid growth thanks to the sharp increase in investment linked to artificial intelligence and to resilient levels of private consumption, despite the labour market gradually cooling.

GDP growth in Eurozone, US and UK (quarter-on-quarter change, %)

Sources: Eurostat, BEA and ONS.

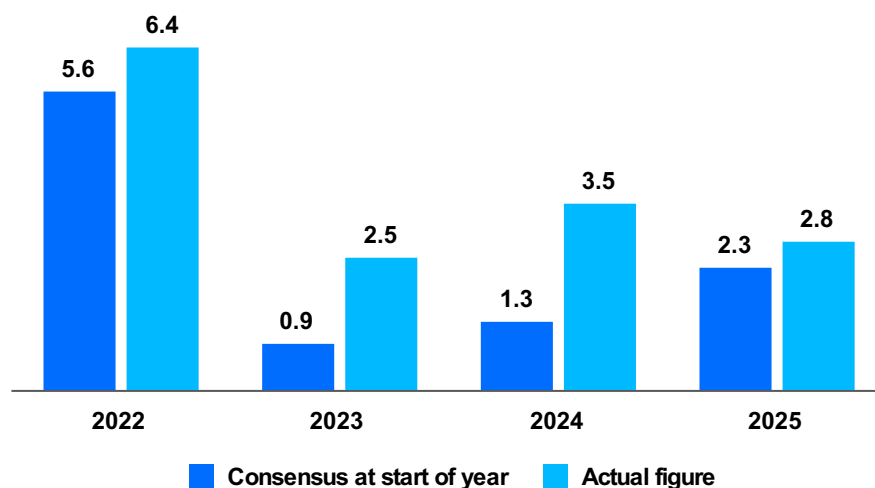


Spain's economic growth once again surprised to the upside.

The Spanish economy outperformed the Eurozone average yet again. Growth in Spain was driven by several factors, such as flows of immigration, which did become more moderate but nevertheless remained a factor that spurred growth, together with the NGEU funds and the pass-through of lower interest rates to the economy. Domestic demand performed well, particularly in terms of private consumption and investment, both in machinery and equipment and in construction. Although exports were affected by the US tariffs, the impact was limited given the small relative weight of this market. The job market remained strong, with the unemployment rate falling to its lowest since 2008, although signs of tension did emerge associated with labour shortages in certain specific sectors.

GDP growth in Spain vs consensus at start of year (annual variation, %)

Sources: INE and Consensus Economics.

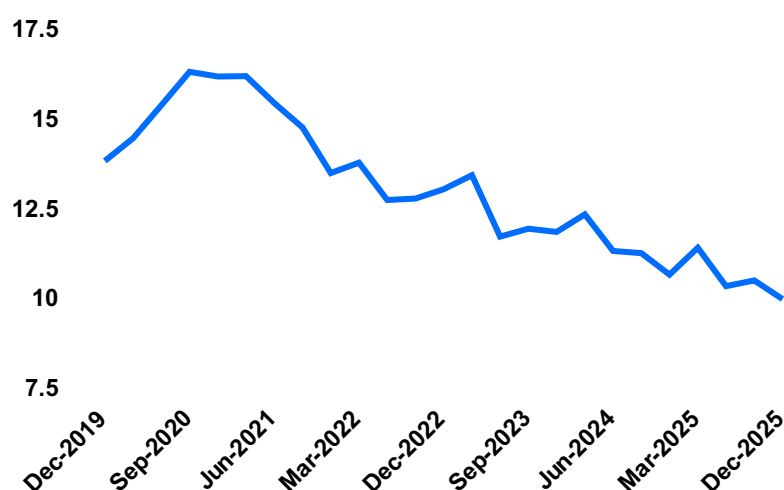


In fiscal terms, Spain's credit rating was revised upwards by the three major credit rating agencies, as they recognised the country's improved public finances and its progress in implementing European funds.

As for Spain's economic policy, other than the aid package approved to cushion the impacts of the US tariffs, it is worth noting the approval, at year-end, of a revised Recovery Plan, which was agreed with the European Commission. The updated Plan aims to facilitate the disbursement of NGEU funds transfers and confirms that only 25% of the total loans available will be used, given that interest rates in the EU are less attractive than Spanish government bond yields and because there is limited time in which to spend the funds. In relation to other economic policy initiatives, such as the automatic debt write-off and the creation of a singular financing system for Catalonia, only scant progress was made. In addition, the government failed to approve the General State Budget for 2026, marking the third consecutive year without a new spending plan.

Unemployment rate in Spain (%)

Source: INE.



In China, economic activity proved resilient despite a still-sluggish real estate market and the strategic clash with the United States. Exports continued to post robust performance, offsetting the slump in sales to the United States, as shipments to other regions increased. The authorities introduced measures to boost consumption and combat the ongoing deflation, a move that was welcomed by the markets.

In Mexico, economic growth continued to lose traction due to a restrictive monetary policy, fiscal consolidation, and the uncertainty regarding relations with the United States, although the impact was less negative than initially expected. As for other emerging economies, these benefited from greater trade fragmentation, a dynamic tech industry (particularly in Asia), and more favourable financial conditions.

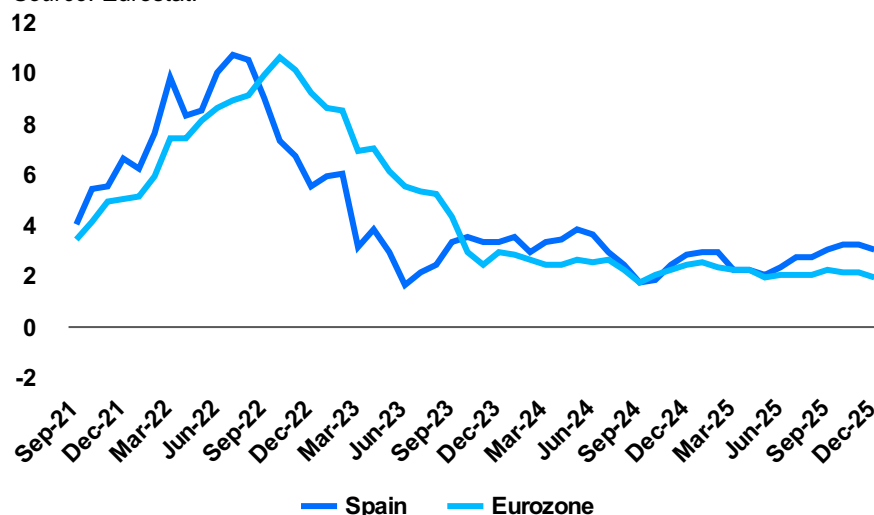
In terms of global inflation, this was generally less of a concern than it had been in previous years. Although the new tariffs did have some impact on the United States, inflationary pressures remained in check in most economies. In the Eurozone, inflation converged towards the ECB's target, with service inflation still sticky. In the United Kingdom, inflation rebounded slightly, due to higher utilities and food prices.

Inflation ceased to be a cause for concern.

In Spain, inflation was lower than in the previous year, although it rebounded in the last few months due to the energy effect and the resilience of tourism-linked services. The pace of house price growth picked up once more, as demand outstripped supply. In the United States, inflation remained above target, with core inflation still pressured by utilities and housing. In Mexico, inflation stabilised at around 4%, at the top end of the target range of the central bank, as a result of sticky services inflation and isolated climate-related events.

HICP in Spain vs Eurozone (year-on-year change in %)

Source: Eurostat.



Monetary policy

In 2025, the main central banks acted with caution in the face of the considerable uncertainty surrounding the global environment, characterised by geopolitical tensions, trade policy shifts and mixed signals in terms of economic activity.

Central banks cut interest rates, exercising caution given the highly uncertain global landscape.

The ECB cut the deposit facility rate by a total of 100 basis points to 2.00%. That signalled an end to the cycle of rate cuts, as inflation was steadily converging towards the target. The ECB also continued to shrink its balance sheet by ceasing to reinvest the proceeds of its maturing bond holdings.

12M Euribor (%)

Source: Refinitiv.



In the United States, the Federal Reserve (Fed) cut its Fed funds rate target by 75 basis points to 3.50–3.75%, after keeping it stable during the first half of the year. The gradually deteriorating labour market was the trigger behind the decision to resume rate cuts. In addition, the Fed announced that it would be ending its quantitative tightening on 1 December 2025 and it began making additional short-term debt purchases to maintain ample reserves and ensure the smooth operation of the repos market.

The Bank of England continued with its rate cut cycle, introducing four 25 basis point cuts to bring its base rate down to 3.75%. The central bank insisted on the need to maintain a restrictive stance for long enough to mitigate inflationary risks, although its latest decisions were not unanimous. As for its balance sheet, it announced that it would be reducing its gilt holdings by 70 billion pounds in 2026.

In Japan, the Bank of Japan forged ahead with its monetary policy normalisation and raised its policy rate by 50 basis points to 0.75%. However, it slowed the pace of its sovereign bond tapering to avoid market dislocation, especially given the impact of the trade war on the Japanese economy.

In Mexico, the central bank continued with its monetary easing, cutting its official interest rate by 300 basis points over the year to 7.0%, encouraged by an environment of controlled inflation and a resilient Mexican peso.

Other central banks in Latin America adopted more prudent stances in the face of the fiscal and political uncertainty, whilst Brazil extended its cycle of rate hikes given the ongoing inflationary pressures. Turkey, for its part, temporarily reversed some of its rate cuts, after an episode of financial volatility, later resuming its cuts even though inflation remained at very high levels.

Financial markets

In 2025, the financial markets posted good performance overall, despite episodes of high volatility associated with the so-called 'Liberation Day' and the uncertainty stemming from the geopolitical and commercial environment. After some initial corrections, risk assets made a strong recovery, driven by fiscal stimulus measures, the tariff truce, economic resilience, solid corporate earnings, and the enthusiasm surrounding artificial intelligence.

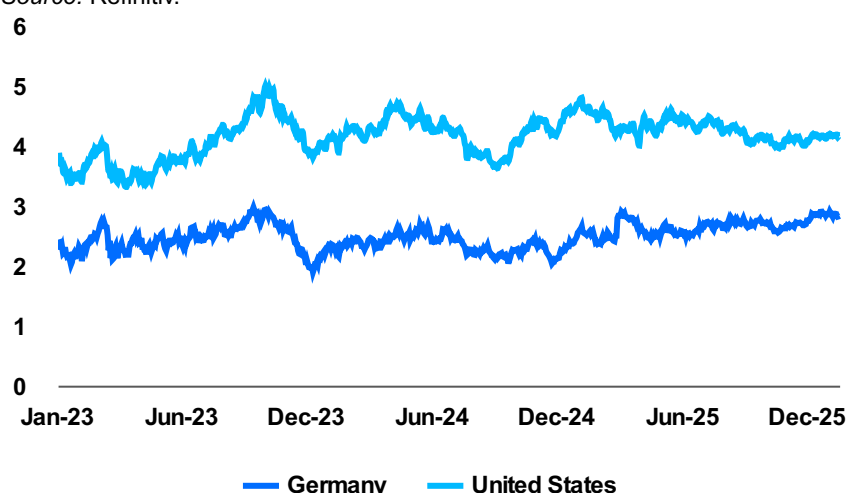
Financial markets performed well in 2025, despite isolated episodes of high volatility.

The main stock market indices either reached all-time highs or posted significant gains. The Stoxx 600 gained 17%, while the IBEX 35 posted an impressive 49% increase, the largest among the main European indices. Stock market increases were also noteworthy in the United States, especially in the tech sector, where S&P 500 gained 16% and Nasdaq 100 gained 20%.

In the fixed-income market, short-term government yields dropped in most jurisdictions, in line with the monetary easing. However, long-term yields remained high, with certain divergence between regions. In the United States, long-term yields dipped due to expectations of cuts to official interest rates, while in Germany they rose against a backdrop of increased tax expenditure.

US and German 10-year government bond yields (%)

Source: Refinitiv.



In Japan, yields rebounded sharply due to expectations of a more restrictive monetary policy and the arrival of its new political leadership, which is embracing an expansionary fiscal approach. In the European periphery, risk premiums were reduced thanks to positive revisions by rating agencies, good economic performance and the progress made in rolling out the NGEU funds. France's risk premium, despite being lower than at the end of 2024, remained at high levels given the considerable political uncertainty, the poor shape of its public finances and the negative actions taken by credit rating agencies.

The US dollar depreciated sharply after Liberation Day, driven by a recalibration of expectations regarding the Fed's monetary policy and by the perception of heightened political risk in the country. The currency later stabilised, ending the year at around 1.17 dollars per euro. The pound sterling depreciated against the euro, weighed down by tax risk in the United Kingdom.

USD to EUR exchange rate

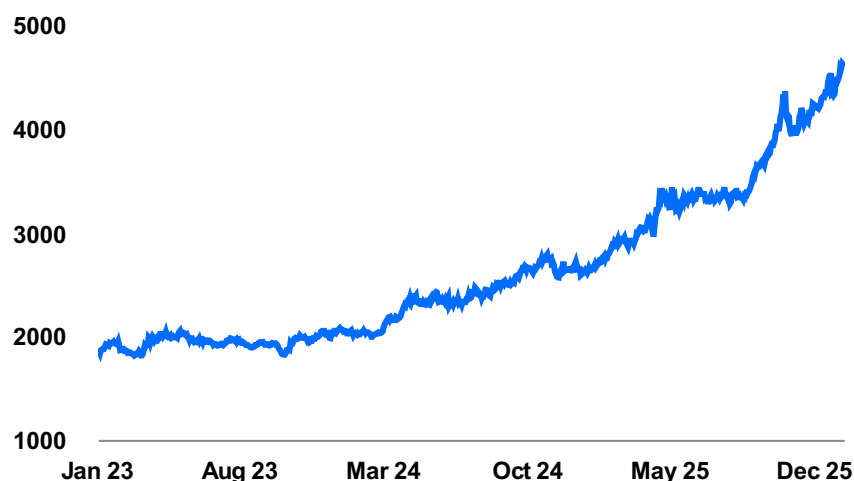
Source: Refinitiv.



In the commodities market, the Brent price fell by around 20%, due to a surplus of global supply, despite the occasional spike linked to geopolitical tensions. Precious metals benefited from the surge in risk aversion: gold recorded its biggest rally since 1979, jumping by 65% to reach a new all-time high, driven by central bank purchasing and international fiscal concerns.

Gold prices (USD per ounce)

Source: Refinitiv.



Corporate bond spreads ended the year at historically low levels, in both the high yield and investment grade segments. After Liberation Day, there were significant rebounds, but the market quickly recovered its positive tone. Nevertheless, the collapse of two firms in the automotive industry, both of which had borrowed from private credit funds, raised some concerns about the health of the sector and the interconnectedness between traditional banks and non-bank financial institutions.

In the emerging markets, risk premiums fell throughout the year thanks to contained inflation, resilient economies, currencies that were posting strong performance, and portfolios that were diversifying internationally beyond the US dollar. However, premiums did encounter occasional bouts of upward pressure, at the time of Liberation Day and due to issues related to tax risks in Brazil and political uncertainty in Turkey. Long-term domestic government bond yields, for their part, generally dropped throughout the year.

Crypto-asset markets surged thanks to the open support from the US administration. Exchange Traded Funds (ETFs) that invest in over-

the-counter crypto-assets recorded considerable inflows. Several firms in the sector filed initial public offerings and saw a jump in their stock prices. Bitcoin touched a record price of just over 125,000 dollars before correcting in November. The market's total market capitalisation reached over 4 trillion dollars in October, the highest level to date.



2.2 Financial sector environment

Banking sector

In 2025, the global banking sector was influenced by the effects stemming from the deregulatory agenda pursued by the United States and by rising geopolitical tensions. From the beginning of the presidential term, measures were taken to reduce the size and scope of the regulatory agencies, including restructuring, dismissals and increased political influence over supervisory bodies. These decisions came alongside regulatory easing and incentives for banks to engage in crypto-related activities.

In the regulatory plane, the US authorities unveiled proposals designed to make the prudential framework more flexible, in order to adapt it to the size, business model and risk profile of each institution. Implementation of Basel III was postponed to 2026. In parallel to this, greater emphasis was placed on the search for a balance between financial innovation and stability, although the market saw these measures as a significant shift towards deregulation.

In contrast, the European Union kept a more prudent stance. The SSM adopted a package for regulatory simplification, but without going as far as deregulation and ensuring the financial stability and solidity of the banking sector. The proposals included adjustments to capital requirements and specific measures for small banks, and the conclusions of the evaluation will be included in the banking sector report, due to be published in 2026.

The situation in the European banking industry continued to improve in 2025, with Spanish banks standing out in a positive light.

The United Kingdom adopted a position more in sync with the US strategy. The Leeds Reforms made regulations considerably more flexible, delaying implementation of a portion of Basel III to 2028 and promoting incentives for channelling retail savings into financial markets. It was argued that these measures were necessary to make the UK financial sector more competitive.

Geopolitical risks were explicitly included in the activities of European supervisors. The 2025 stress test included an adverse scenario in which geopolitical tensions disrupted trade channels, lowered economic growth and affected the banking sector. A thematic stress test for 2026 was also announced, which will focus on geopolitical risks as part of the ICAAP. Supervisors also asked banks to increase their provisions to prepare for a potential deterioration as a result of the new wave of tariffs.

The European and Spanish banking sectors showed resilience despite the challenging environment. Spanish banks stood out due to their profitability, efficiency and credit quality, although their CET1 capital ratios remained below the European average. Nonetheless, their other solvency metrics and the positive development of their business put them in a comparatively good position.

Towards the end of the year, a new development rekindled concerns about regional banks in the United States, after several of them revealed

exposures to two bankrupt firms associated with the automotive industry and involved in allegations of fraud, namely Tricolor and First Brands. Both firms also had links to private credit, which gave rise to unease regarding the interconnectedness between the bank and non-bank sectors. Major banks also publicly disclosed that they had exposures to those bankrupt firms.

Over the year, bank consolidation processes intensified both in the United States and in Europe. In Italy, various takeover attempts were scuppered by the complexity of the shareholding structure and the government's intervention in strategic deals. Portugal and Greece saw some major takeovers by international banks go ahead, while in Germany corporate movements involving systemic banks continued, although with no definitive resolution.

In parallel to this, some countries introduced new tax measures applicable to the sector. Italy revised its treatment of tax credits used by banks, while the United Kingdom debated on whether to increase the taxes on the sector, although ultimately the proposals were not featured in the country's budget.

Financial stability and macroprudential policy

In 2025, the risks for financial stability skyrocketed against a backdrop of geopolitical uncertainty, trade tensions and extremely volatile markets. The main sources of risk identified include the possibility of disorderly asset price adjustments, potential credit impairment in sectors exposed to geopolitical tensions, increased volatility in sovereign debt markets, and a fragile non-bank financial sector, especially in the private credit sector. It was also made clear that new emerging risks need to be monitored, such as those linked to crypto-assets, dollar-backed stablecoins, and the increase in cyberattacks and fake news.

The non-bank financial sector, in particular the private credit market, raised considerable concerns over the year. Episodes of stress together with the collapse of various firms with complex financing revealed the sector's vulnerabilities and the risk of these spilling over to banks. The Bank of England responded by announcing its very first stress test, which will cover banks, insurers, private credit funds and other non-bank institutions; it plans to release the results in 2026.

In Europe, macroprudential policy remained restrictive. The Bank of Spain raised the countercyclical capital buffer from 0.5% to 1%, applicable as from October 2026. According to the central bank, the voluntary capital buffers of Spanish banks allow them to comfortably cover this increase, without compromising their funding capability. Progress was also made in preparing to implement borrower-based measures, following in the footsteps of the other Eurozone countries.

Savings and Investments Union (SIU)

In 2025, the European Commission unveiled the Savings and Investments Union (SIU), a strategy designed to increase the financial integration of the European Union and to strengthen both the Banking Union and the Capital Markets Union. The main goal pursued by the SIU is to channel European consumer savings towards productive investments that can be used to address the major structural challenges facing the continent, such as climate change, technological transformation and the needs stemming from a more demanding geopolitical environment. According to the Letta report, the European Union will need between 750 billion and 800 billion euros per year until 2030 to finance these priorities.

Over the year, various initiatives were presented, designed to raise retail investor participation in capital markets, rewire the securitisations market and support the role of institutional investors in financing the European economy. These included the creation of a savings account with tax incentives, the launch of a new label for financial products that invest in Europe, and a lower risk weight for certain equity exposures to banks.

Under the SIU, the European Securities and Markets Authority (ESMA) will also be given more powers to oversee significant institutions operating in the markets and the conversion of certain directives into regulations in order to simplify bank rules and reduce fragmentation. Both the European Central Bank and several national governments publicly supported this agenda, pointing out the need for greater financial integration to ensure Europe's strategic autonomy and its global competitiveness.

Challenges for the banking industry

In 2025, the banking industry faced a major change in the sustainability agenda, influenced by the United States' withdrawal from key climate agreements and by the country's supervisors ending their membership of the Network of central banks and supervisors for Greening the Financial System (NGFS). This shift had a domino effect on the banks and asset managers of other jurisdictions, weakening global climate partnerships such as the Net-Zero Banking Alliance, which ended up transitioning to a non-binding framework of recommendations.

Climate deregulation in the United States expedited the planned review of the ESG framework in Europe, leading to the Omnibus I proposal, which aims to simplify reporting obligations of firms, particularly for SMEs. Although this change sought to reduce administrative burdens, various banking associations argued that the reduced availability of data could make risk assessments harder and drive up costs.

Throughout the year, there was a surge of the phenomenon known as greenhushing, whereby some firms opted to remove all specific mentions of sustainability from their communications to reduce litigation and reputational risks, even though they were still pursuing initiatives aligned with the climate transition.

Supervisors from across the globe, including the ECB, continued to develop frameworks to embed climate risks into financial asset valuations. The ECB announced the introduction of a climate factor from 2026 onwards, which will reduce the recognised value of assets issued by carbon-intensive firms when those assets are used as collateral in liquidity operations.

Digitalisation processes continued at an increasingly fast pace, especially in connection with tokenisation, crypto-assets and artificial intelligence. In the United States, the administration pushed through a

regulatory framework designed to support the development of crypto-asset markets (including the approval of the GENIUS Act to regulate stablecoins), to ease supervision and to withdraw previous restrictions. These initiatives were posited as a strategy to keep the US dollar as the dominant reserve currency in the digital financial system, against a backdrop in which the issuance of a digital currency by the Federal Reserve had been ruled out. All this led to a major trend shift with regard to cryptocurrency markets, with a far more favourable and enabling approach to these activities.

In Europe, with regard to digitalisation regulations, MiCA was gradually phased in, although some countries chose to extend the transitional periods. The strong growth of dollar-backed stablecoins and their potential to become a mainstream currency for payments in the EU ignited debates on the need to revise certain aspects of MiCA to mitigate risks to financial stability. The European Systemic Risk Board warned that stablecoins issued jointly by EU and non-EU entities could result in market-wide exposure.

Progress continued to be made with the digital currencies of central banks. The digital euro project concluded the preparation phase, with expectations for a regulatory framework in 2026, pilot testing in 2027 and potentially its first issuance in 2029. In parallel to this, a complementary infrastructure was explored, consisting of interconnecting instant payment systems ('landing zone'). China, for its part, also showed a slightly more open attitude towards stablecoins, and it could take advantage of Hong Kong's regulatory impetus for stablecoins and other digital asset initiatives to adopt a somewhat more flexible approach to the threat posed by the potential flood of dollar-backed stablecoins. The United Kingdom continued to work on a potential digital pound, although progress was slower and there were more doubts as to whether the project will ultimately be necessary. The United States began pushing through a law to prohibit the digital dollar, responding to an executive order by Trump banning the Fed from issuing it.

More intensive work was made on initiatives designed to achieve interoperability between digital currencies and tokenised deposits, including Project Agora, led by BIS, and other similar projects promoted by BRICS countries (Brazil, Russia, India and China). These developments reflect the transition towards a more digital and interconnected financial system, with new risk models that banks will need to embed into their future strategies.

2.3 Outlook for 2026

In 2026, there is likely to be more evidence of the impacts stemming from the economic agenda pursued by the Trump administration. However, these impacts are not expected to generate any severe economic and/or financial disruptions. Global economic growth will tend to grow more steadily, with the European Union and China capable of finding internal levers to boost domestic demand and largely offset the effects of the US economic policy. It is thought that growth in the United States will slow down as a result of the imposition of tariffs and restrictions on immigration. In Mexico, economic activity could gradually recover following the successful renegotiation of the USMCA trade deal.

In terms of geopolitics, it is thought that all of the current conflicts will continue, but that they will not escalate or have any far-reaching economic ramifications. In Ukraine, it is unlikely that a definitive solution to the conflict will be reached, although there will be no additional Russian pressure on NATO. In the Middle East, the confrontation between Israel and Iran is not expected to translate into critical disruptions in oil and gas flows. As for trade, the level of tariffs imposed by the United States is expected to be manageable for all other countries, as these are capable of absorbing their impacts. That said, international trade relations are not expected to be evenly balanced or long-lasting.

In terms of inflation, headline inflation is likely to remain close to the targets pursued by central banks, except in the case of the United States, where it could climb to slightly higher levels in the near term. After the tariff shock, inflation could remain at around 2% in the Eurozone, underpinned by the strength of the euro and the absence of retaliatory measures. In general, inflation will continue to be volatile and erratic, due to various supply shocks (tariffs, reconfiguration of production chains, redirection of trade flows, geopolitical tensions, and adverse climatic events).

Although trade-related issues will be a key source of uncertainty, attention is likely to also turn to fiscal matters. In this respect, the United States is a cause for concern, given the deterioration of its public finances and the approval of a new fiscal stimulus package. In Europe, the main tax-related concerns will remain centred on the United Kingdom, France and Italy, in a context in which the markets will have to absorb the increased supply of government debt associated with the shift in Germany's tax policy.

As for monetary policy, central banks will probably keep interest rates at levels close to neutrality. In the United States, it is thought that the Federal Reserve will retain its independence, despite political pressures and Powell's replacement planned for 2026. This, together with inflationary pressures related to the tariff war, will limit the scope for rate cuts. In Europe, the ECB will likely keep the deposit facility rate at its current levels for several years, in a context of economic activity stifled by tariff increases, the appreciation of the euro and China's manufacturing overcapacity.

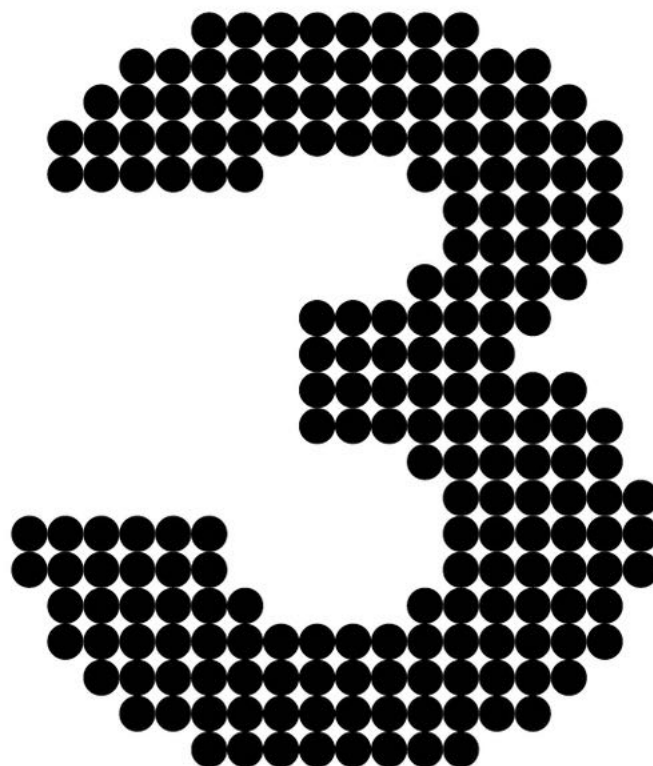
In the financial markets, yields on long-term government bonds are expected to remain at relatively high levels, driven by a higher term premium linked to volatility in growth and inflation figures and high sovereign financing needs. Risk premiums on European periphery countries' debt will remain at contained levels and in line with their credit ratings. In the currency market, the dollar is expected to depreciate against the euro, in line with the trend of short-term interest rate differentials and a higher uncertainty premium associated with the US economic policy.

In Spain, economic growth will be driven by population increases, NGEU funds and low interest rates. The country is relatively well positioned within the global context: (i) its limited trade relations with the United States make it less sensitive to tariffs, (ii) Spain is not among the countries most exposed to tax risks, and (iii) the sound financial situation of households and companies helps to protect them against potential tensions. The economy is therefore likely to continue to outgrow the Eurozone, gradually coming closer to growth rates more in keeping with its potential.

In the financial landscape, the banking industry proves robust and resilient. The trade war is expected to have a limited impact on delinquency levels in the sectors represented on the balance sheet. In the European Union, banks start off from a strong position that will likely continue as profitability and capital levels remain high. As for the regulatory landscape, new phases of Basel III are due to come into force, according to the established calendar, while progress made towards European integration will focus on initiatives linked to the Savings and Investments Union.



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Financial information

3.1 Key figures in 2025

The Group's main figures, which include financial and non-financial indicators that are key to determine the direction in which the Group is moving, are set out here below:

	2025	2024	Year-on-year change (%)
Income statement (million euro) (A)			
Net interest income	4,837	5,021	(3.7)
Gross income	6,284	6,337	(0.8)
Pre-provisions income	3,184	3,254	(2.1)
Profit attributed to the Group	1,775	1,827	(2.8)
Balance sheet (million euro) (B)			
Total assets	245,392	239,598	2.4
Gross performing loans	160,708	156,913	2.4
Gross loans to customers	164,864	161,717	1.9
On-balance sheet customer funds	172,265	169,557	1.6
Off-balance sheet funds	52,656	46,171	14.0
Total customer funds	224,921	215,729	4.3
Funds under management and third-party funds	253,563	243,431	4.2
Equity	14,082	15,033	(6.3)
Shareholders' equity	14,631	15,389	(4.9)
Profitability and efficiency (%) (C)			
ROA	0.7	0.8	
RORWA	2.2	2.3	
ROE	11.9	12.4	
ROTE	14.3	14.9	
Cost-to-income	49.3	48.7	
Risk management (D)			
Non-performing assets (million euro)	4,803	5,680	(15.4)
NPL ratio (%)	2.37	2.84	
Credit cost of risk (bps)	21	26	
Total cost of risk (bps)	31	42	
Capital management (E)			
Risk-Weighted Assets (RWAs) (million euro)	80,111	80,485	
Common Equity Tier 1, phase-in (%)	(1) 13.16	13.03	
Tier 1, phase-in (%)	(2) 16.59	15.20	
Total Capital ratio, phase-in (%)	(3) 18.23	17.62	
Leverage ratio, phase-in (%)	5.40	5.20	
Liquidity management (F)			
Loan-to-deposit ratio	93.5	93.2	
LCR	186	210	
NSFR	139	142	
Shareholders and shares (as at reporting date) (G)			
Number of shares outstanding (million) (*)	4,998	5,361	
Share price (euro)	3.365	1.877	
Market capitalisation (million euro)	16,818	10,063	
Earnings Per Share (EPS) (euro)	0.32	0.32	
Book value per share (euro)	2.93	2.87	
P/TBV (price/tangible book value per share)	1.40	0.78	
Price/Earnings ratio (share price/EPS)	10.64	5.84	
Other data			
Branches and offices	1,336	1,350	
Employees	18,736	18,769	

(*) Total number of shares minus final treasury stock position (including shares in the buyback programme, where applicable).

(A) This section sets out the margins of the income statement that are thought to be the most significant over the last two years.

(B) These key figures are presented in order to provide a concise overview of the year-on-year changes in the main items of the Group's consolidated balance sheet, focusing particularly on items related to lending and customer funds.

(C) These ratios have been provided to give a meaningful picture of profitability and efficiency over the past two years.

(D) This section shows the key balances related to risk management in the Group, as well as the most significant ratios related to risk.

(E) These ratios have been provided to give a meaningful picture of solvency over the past two years.

(F) The aim of this section is to give a meaningful insight into liquidity over the past two years.

(G) The purpose is to provide information regarding the share price and other indicators and ratios related to the stock market.

(1) Common equity capital / Risk-Weighted Assets (RWAs).

(2) Tier one capital / Risk-Weighted Assets (RWAs).

(3) Capital base / Risk-Weighted Assets (RWAs).

In the Group's management reporting figures, the results of TSB and its subsidiary undertakings are disclosed in disaggregate form and line by line, just as they had been in previous years, whereas in the Group's consolidated income statement used for statutory reporting, the results linked to those companies are disclosed in aggregate under the heading "Profit or loss after tax from discontinued operations". In addition, in connection with the termination of the agreement to sell Paycomet, S.L.U. and the start of the strategic partnership for the merchant acquiring service signed between the Bank and Nexi S.p.A. for the sale of Banco Sabadell's merchant acquiring business, the management reporting figures for 2024 have not been restated, unlike the statutory reporting figures shown in the Group's consolidated income statement for that year, shown for the purpose of comparison in the consolidated notes to the accounts, which have been.

The accounting treatment of both operations is described in Note 1.4 to the consolidated annual financial statements for 2025.

The section "Performance measures and reconciliation with management indicators" contained in this Directors' Report includes a reconciliation between the Group's consolidated income statement and the profit and loss account used for management reporting.



3.2 Income statement

The Group's net profit amounted to 1,775 million euros as at the end of 2025, bringing its ROTE to 14.3%.

Million euro

	2025	2024	Year-on-year change (%)
Net interest income	4,837	5,021	(3.7)
Net fees and commissions	1,384	1,357	2.0
Core revenue	6,221	6,378	(2.5)
Profit or loss on financial operations and exchange differences	4	87	(95.0)
Equity-accounted income and dividends	181	166	8.9
Other operating income and expenses	(122)	(294)	(58.4)
Gross income	6,284	6,337	(0.8)
Operating expenses	(2,600)	(2,583)	0.7
Staff expenses	(1,576)	(1,531)	2.9
Other general administrative expenses	(1,025)	(1,051)	(2.6)
Depreciation and amortisation	(500)	(501)	(0.2)
Total costs	(3,100)	(3,084)	0.5
<i>Memorandum item:</i>			
Recurrent costs	(3,100)	(3,062)	1.2
Non-recurrent costs	—	(21)	(100.0)
Pre-provisions income	3,184	3,254	(2.1)
Total provisions and impairments	(546)	(714)	(23.5)
Provisions for loan losses	(481)	(567)	(15.2)
Provisions for other financial assets	(39)	(69)	(43.2)
Other provisions and impairments	(27)	(78)	(65.8)
Capital gains on asset sales and other revenue	(37)	(26)	40.7
Profit or loss before tax	2,601	2,514	3.5
Corporation tax	(824)	(685)	20.2
Profit or loss attributed to minority interests	2	2	(0.9)
Profit attributed to the Group	1,775	1,827	(2.8)

The average exchange rate used for the cumulative balance of TSB's income statement is GBP 0.8566 (GBP 0.8463 in 2024).

Net interest income

Net interest income amounted to 4,837 million euros as at the end of 2025, falling by 3.7% year-on-year, mainly as a result of the performance of the business excluding TSB, which fell by -6.6%, essentially due to a reduced credit yield and a smaller contribution by credit institutions, both impacted by lower interest rates, although this was partially offset by the good performance of volumes and by the growth of TSB, in turn driven by the impact of the structural balance sheet hedge.

Consequently, the net interest margin as a percentage of average total assets stood at 1.97% in 2025 (2.07% in 2024).

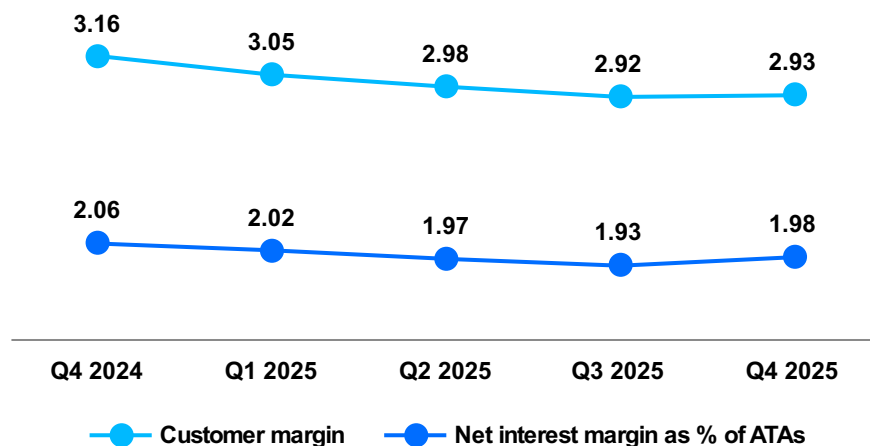
The breakdown of net interest income for the years 2025 and 2024, as well as the different components of the total amounts of investments and funds, is as follows:

Thousand euro

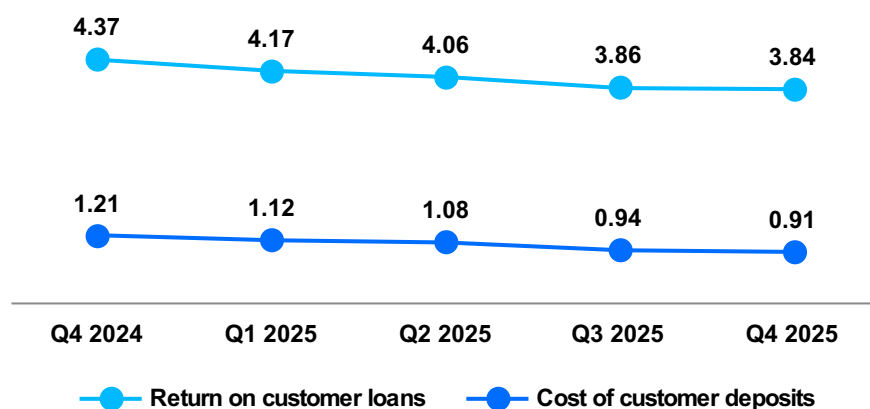
	2025			2024			Variation			Effect	
	Average balance	Profit/(loss)	Rate %	Average balance	Profit/(loss)	Rate %	Average balance	Profit/(loss)	Rate	Volume	Days
Cash, central banks and credit institutions	31,980,241	921,245	2.88	37,770,825	1,496,204	3.96	(5,790,584)	(574,959)	(396,003)	(174,831)	(4,125)
Loans and advances to customers	159,198,277	6,335,889	3.98	154,131,178	6,726,169	4.36	5,067,099	(390,280)	(590,224)	211,224	(11,280)
Fixed-income portfolio	35,840,571	1,097,469	3.06	30,756,499	1,053,155	3.42	5,084,072	44,314	(81,117)	127,413	(1,982)
Subtotal	227,019,089	8,354,603	3.68	222,658,502	9,275,528	4.17	4,360,587	(920,925)	(1,067,344)	163,806	(17,387)
Equity portfolio	1,366,939	—	—	1,000,799	—	—	366,140	—	—	—	—
Tangible and intangible assets	4,289,507	—	—	4,497,961	—	—	(208,454)	—	—	—	—
Other assets	12,545,724	224,076	1.79	13,987,412	436,450	3.12	(1,441,688)	(212,374)	—	(212,374)	—
Total investments	245,221,259	8,578,679	3.50	242,144,674	9,711,978	4.01	3,076,585	(1,133,299)	(1,067,344)	(48,568)	(17,387)
Central banks and credit institutions	25,278,379	(697,275)	(2.76)	26,372,582	(1,045,965)	(3.97)	(1,094,203)	348,690	260,312	85,409	2,969
Customer deposits	167,305,431	(1,692,547)	(1.01)	162,250,211	(1,997,041)	(1.23)	5,055,220	304,494	331,522	(32,430)	5,402
Capital markets	27,212,740	(955,523)	(3.51)	26,668,161	(1,105,456)	(4.15)	544,579	149,933	168,316	(21,393)	3,010
Subtotal	219,796,550	(3,345,345)	(1.52)	215,290,954	(4,148,462)	(1.93)	4,505,596	803,117	760,150	31,586	11,381
Other liabilities	10,914,939	(396,628)	(3.63)	12,485,224	(542,181)	(4.34)	(1,570,285)	145,553	—	145,553	—
Own funds	14,509,770	—	—	14,368,496	—	—	141,274	—	—	—	—
Total funds	245,221,259	(3,741,973)	(1.53)	242,144,674	(4,690,643)	(1.94)	3,076,585	948,670	760,150	177,139	11,381
Average total assets	245,221,259	4,836,706	1.97	242,144,674	5,021,335	2.07	3,076,585	(184,629)	(307,194)	128,571	(6,006)

Financial income or expenses arising from the application of negative interest rates are recorded in line with the nature of the associated asset or liability.

Quarterly evolution of net interest income (%)



Quarterly evolution of customer margin (%)



Gross income

Net fees and commissions came to 1,384 million euros as at the end of 2025, representing an increase of 2.0% year-on-year, which was mainly due to higher asset management and insurance fees, driven by the sharp growth of off-balance sheet customer funds.

Profit or loss on financial operations and exchange differences came to a total of 4 million euros, representing a decrease compared to the end of 2024, mainly due to the impact of the currency hedge in sterling to cover the sale price of TSB, and due to an offer to buy back subordinated bonds.

Dividends received and earnings of companies consolidated under the equity method amounted to 181 million euros, compared with 166 million euros in the previous year, mainly due to higher earnings from the insurance business.

Other operating income and expenses amounted to a total of -122 million euros, compared to -294 million euros in 2024. The positive year-on-year variation is mainly attributable to the bank levy, whose last year of validity was 2024, and which generated an expense of 192 million euros in that year. In 2025, the tax on net interest and commission income of certain financial institutions came into effect, amounting to 123 million euros, which was recognised under the Corporation tax line item.

Pre-provisions income

Total costs stood at 3,100 million euros as at the end of 2025, representing an increase of 0.5% year-on-year, where it is worth calling attention to the increase in staff expenses. In addition, after the strategic deal signed between Nexi S.p.A. and Banco Sabadell (see Note 2 to the consolidated annual financial statements for 2025) came to an end in October 2025, certain expenses related to the assets of the subsidiary Paycomet, which in 2024 were recognised under provisions, were instead recognised as depreciation expenses in 2025.

It is worth noting the improvement in asset quality, which has made it possible to reduce the Group's provisions.

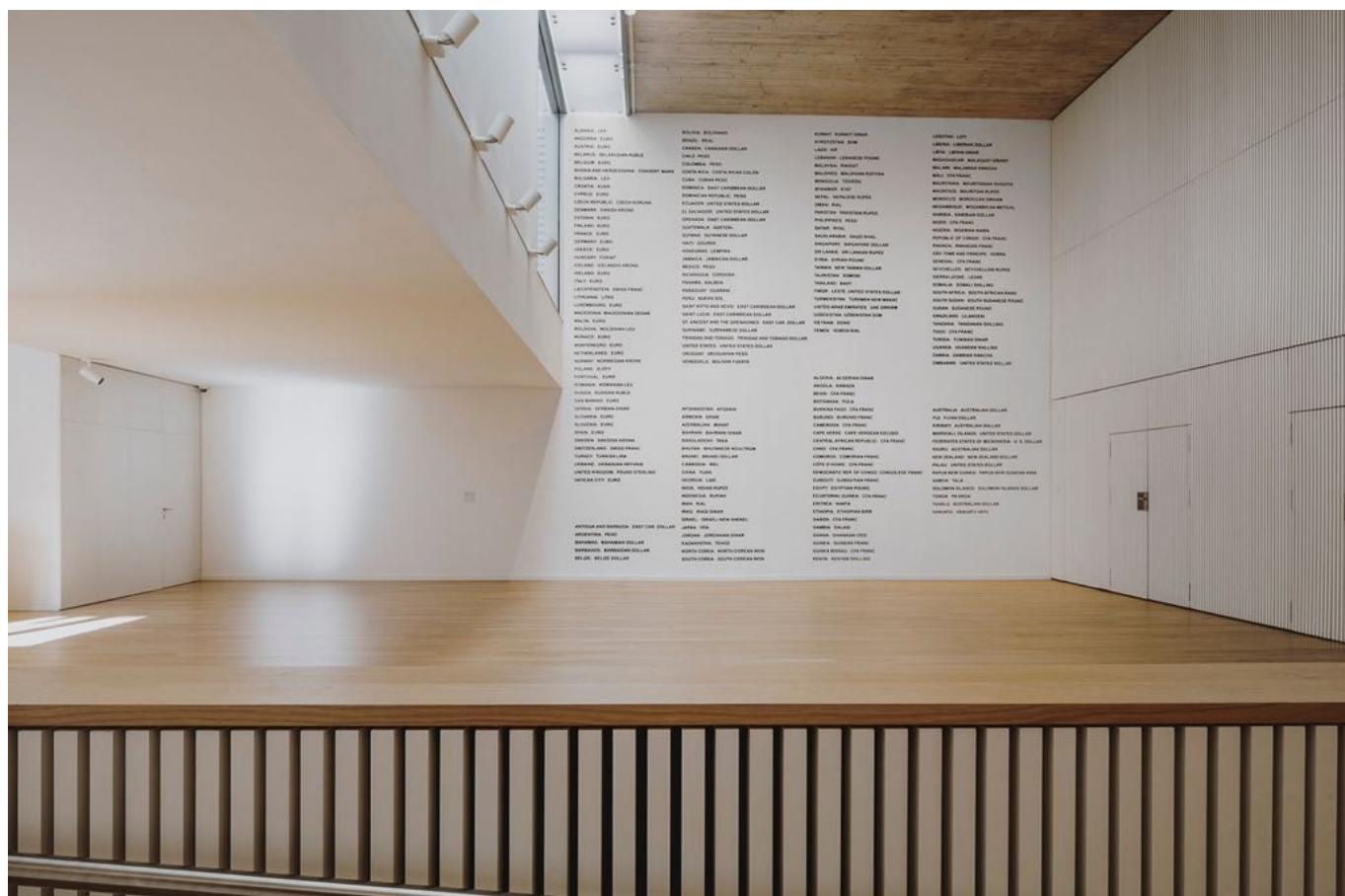
Total provisions and impairments amounted to 546 million euros as at the end of 2025, compared to 714 million euros as at the end of the previous year, representing a reduction of 23%, due to an improvement in both credit provisions and real estate provisions.

Capital gains on asset sales and other revenue amounted to -37 million euros as at the end of 2025. The negative year-on-year change is due to the recognition of greater losses on asset write-offs.

Profit attributed to the Group

After deducting corporation tax, the tax on net interest and commission income and the portion of profit or loss corresponding to minority interests, net profit attributed to the Group amounted to 1,775 million euros as at the end of 2025, falling by 2.8% year-on-year.

In 2024, 109 million euros (net) of extraordinary impacts were recognised; if we exclude these impacts, the Group's net profit was actually up by 3.4%.



3.3 Balance sheet

Million euro

	2025	2024	Year-on-year change (%)
Cash, cash balances at central banks and other demand deposits	17,206	18,382	(6.4)
Financial assets held for trading	3,609	3,439	5.0
Non-trading financial assets mandatorily at fair value through profit or loss	194	168	15.6
Financial assets at fair value through other comprehensive income	6,320	6,370	(0.8)
Financial assets at amortised cost	204,104	196,520	3.9
Debt securities	29,346	24,876	18.0
Loans and advances	174,759	171,644	1.8
Investments in joint ventures and associates	482	525	(8.2)
Tangible assets	1,978	2,078	(4.8)
Intangible assets	2,642	2,549	3.6
Non-current assets and disposal groups classified as held for sale	667	718	(7.1)
Other assets	8,188	8,848	(7.5)
Total assets	245,392	239,598	2.4
Financial liabilities held for trading	2,252	2,381	(5.4)
Financial liabilities at amortised cost	227,444	220,228	3.3
Deposits	195,385	186,341	4.9
Central banks	686	1,697	(59.6)
Credit institutions	19,845	14,822	33.9
Customers	174,853	169,823	3.0
Debt securities issued	26,054	27,437	(5.0)
Other financial liabilities	6,005	6,450	(6.9)
Provisions	370	478	(22.6)
Liabilities included in disposal groups classified as held for sale	—	30	(99.9)
Other liabilities	1,244	1,447	(14.1)
Total liabilities	231,310	224,565	3.0
Shareholders' equity	14,631	15,389	(4.9)
Accumulated other comprehensive income	(584)	(391)	49.2
Minority interests [non-controlling interests]	35	34	0.5
Equity	14,082	15,033	(6.3)
Total equity and total liabilities	245,392	239,598	2.4
Loan commitments given	27,316	28,775	(5.1)
Financial guarantees given	1,835	1,980	(7.3)
Other commitments given	9,714	9,366	3.7
Total memorandum accounts	38,864	40,121	(3.1)

The EUR/GBP exchange rate applied to the balance sheet is 0.8726 as at 31 December 2025 and 0.8292 as at 31 December 2024.

Gross performing loans to customers ended the year 2025 with a balance of 160,708 million euros, growing by 2.4% year-on-year, driven both by good performance in Spain, which recorded growth across all segments, but particularly in the mortgage book, and by the businesses abroad.

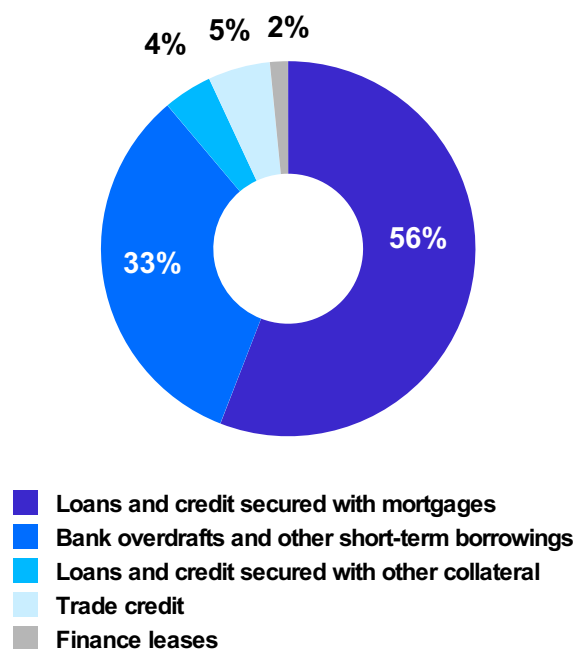
Home equity loans formed the largest single component of gross loans and receivables, amounting to 89,844 million euros as at 31 December 2025 and representing 55.9% of total gross performing loans to customers.

Million euro

	2025	2024	Year-on-year change (%)
Loans and credit secured with mortgages	89,844	89,185	0.7
Loans and credit secured with other collateral	6,771	5,924	14.3
Trade credit	8,605	8,356	3.0
Finance leases	2,527	2,376	6.4
Bank overdrafts and other short-term borrowings	52,961	51,071	3.7
Gross performing loans to customers	160,708	156,913	2.4
Stage 3 assets (customers)	3,909	4,595	(14.9)
Accrual/deferral adjustments	247	208	18.7
Gross loans to customers, excluding reverse repos	164,864	161,717	1.9
Reverse repos	71	—	--
Gross loans to customers	164,935	161,717	2.0
Reserve for loan losses and country risk	(2,498)	(2,844)	(12.2)
Loans and advances to customers	162,437	158,872	2.2

The EUR/GBP exchange rate applied to the balance sheet is 0.8726 as at 31 December 2025 and 0.8292 as at 31 December 2024.

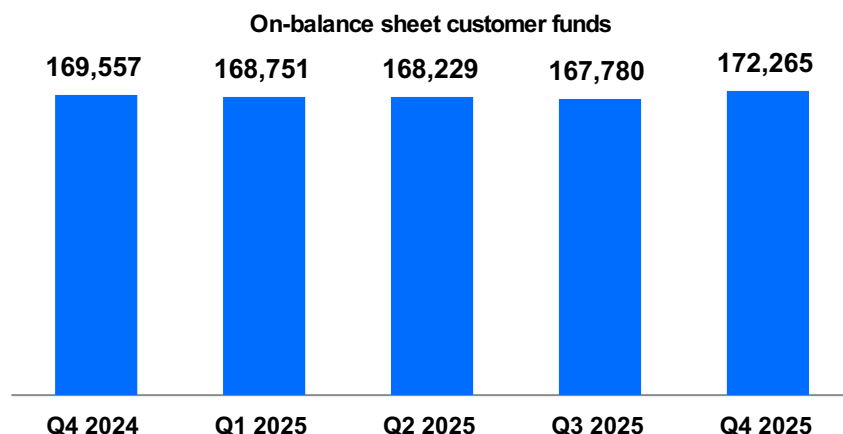
The composition of loans and advances to customers by type of product is shown in the following chart (not including stage 3 assets or accrual/deferral adjustments):



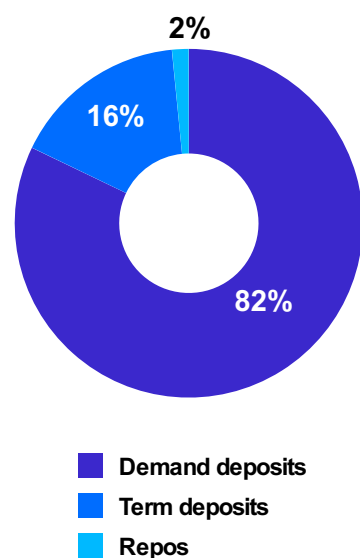
As at the end of 2025, on-balance sheet customer funds amounted to 172,265 million euros, compared to 169,557 million euros as at the end of 2024, increasing by 1.6% due to a larger volume of demand deposits.

Demand deposit balances amounted to 143,400 million euros, representing an increase of 3.7% compared to 2024.

Term deposits came to a total of 28,476 million euros, representing a decrease of 8.3% year-on-year, affected by the shift of funds towards off-balance sheet products.



The breakdown of customer deposits as at 2025 year-end is shown below:



Total off-balance sheet customer funds came to 52,656 million euros as at the end of 2025, reflecting an increase of 14% in year-on-year terms, where it is particularly worth noting the good evolution of mutual funds, mainly explained by positive net subscriptions, as well as the increase in third-party insurance products and assets under management.

Total funds under management as at 31 December 2025 amounted to 253,563 million euros, compared to 243,431 million euros as at 31 December 2024, representing a year-on-year increase of 4.2%, due to the growth of both on-balance sheet customer funds and off-balance sheet funds, as explained above.

Million euro

	2025	2024	Year-on-year change (%)
On-balance sheet customer funds (*)	172,265	169,557	1.6
Customer deposits	174,853	169,823	3.0
Current and savings accounts	143,400	138,347	3.7
Term deposits	28,476	31,047	(8.3)
Repos	2,709	—	--
Accrual/deferral adjustments and hedging derivatives	268	429	(37.5)
Borrowings and other marketable securities	21,788	23,345	(6.7)
Subordinated liabilities (**)	4,265	4,092	4.2
On-balance sheet funds	200,907	197,260	1.8
Collective investment undertakings	31,707	28,308	12.0
Managed	831	674	23.2
Sold but not managed	30,876	27,634	11.7
Assets under management	5,887	4,729	24.5
Pension funds	3,430	3,352	2.3
Personal schemes	2,195	2,166	1.4
Workplace schemes	1,231	1,183	4.1
Collective schemes	3	4	(9.1)
Third-party insurance products	11,632	9,782	18.9
Off-balance sheet customer funds	52,656	46,171	14.0
Funds under management and third-party funds	253,563	243,431	4.2

(*) Includes customer deposits (excl. repos) and other liabilities placed via the branch network: straight bonds issued by Banco Sabadell, commercial paper and others.

(**) Refers to subordinated debt securities issued.

The EUR/GBP exchange rate applied to the balance sheet is 0.8726 as at 31 December 2025 and 0.8691 as at 31 December 2024.

The balance of non-performing assets was reduced by 877 million euros over the year, while the coverage ratio considering total provisions rose to 59.9%.

Throughout 2025, a reduction in non-performing assets was observed. The quarterly evolution of these assets in 2025 and 2024 is shown below:

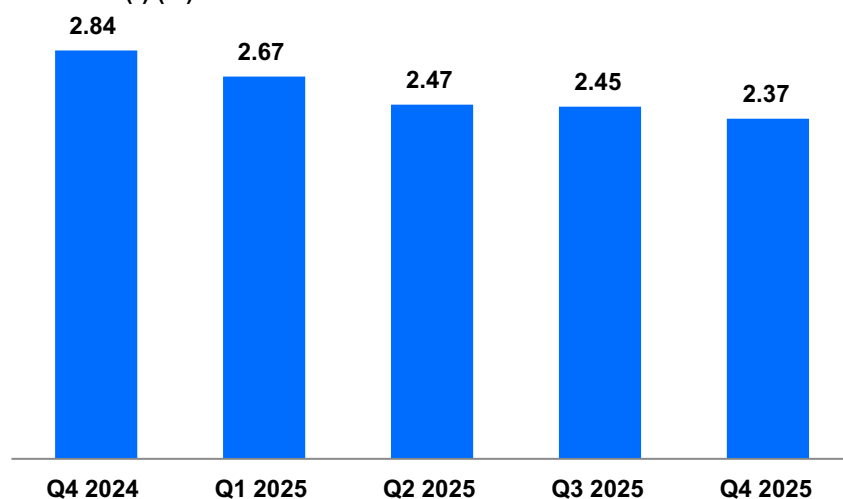
Million euro

	2025				2024			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Ordinary net increase in stage 3 loans	(102)	(160)	82	(37)	40	(182)	(27)	(307)
Real estate asset variation	(25)	(38)	(44)	(45)	(32)	(36)	(31)	(36)
Ordinary net increase in stage 3 loans + real estate	(126)	(198)	38	(81)	8	(219)	(58)	(344)
Write-offs	159	130	108	111	100	97	128	132
Ordinary QoQ change in balance of stage 3 loans and real estate	(286)	(329)	(69)	(193)	(92)	(316)	(186)	(476)

As a result of the reduction in exposures classified as stage 3, associated with an increase in the risk base, the NPL ratio reached 2.37% as at 2025 year-end, compared to 2.84% as at 2024 year-end (decrease of 47 basis points). The stage 3 coverage ratio with total provisions as at 31 December 2025 was 63.8% compared to 61.7% one year earlier, while the coverage ratio of non-performing real estate assets stood at 36.6% as at 31 December 2025, compared to 40.5% at the end of the previous year.

As at 31 December 2025, the balance of exposures classified as stage 3 in the Group, including contingent exposures, amounted to 4,119 million euros, having declined by 725 million euros in 2025.

NPL ratio (*) (%)



(*) Calculated including contingent exposures.

The trend followed by the Group's coverage ratios is shown in the table below:

	2025				2024			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Stage 3 exposures	4,583	4,292	4,267	4,119	5,718	5,439	5,283	4,844
Total provisions	2,874	2,730	2,722	2,626	3,346	3,247	3,213	2,990
Stage 3 coverage ratio, with total provisions (%)	62.7	63.6	63.8	63.8	58.5	59.7	60.8	61.7
Stage 3 provisions	2,147	2,034	2,035	1,936	2,433	2,399	2,365	2,245
Stage 3 coverage ratio (%)	46.8	47.4	47.7	47.0	42.5	44.1	44.8	46.3
Non-performing real estate assets	811	773	729	684	939	902	872	836
Provisions for non-performing real estate assets	327	306	272	251	370	356	352	338
Non-performing real estate coverage ratio (%)	40.3	39.5	37.3	36.6	39.4	39.5	40.3	40.5
Total non-performing assets	5,394	5,065	4,996	4,803	6,657	6,341	6,155	5,680
Provisions for non-performing assets	3,201	3,036	2,994	2,877	3,715	3,604	3,564	3,329
NPA coverage ratio (%)	59.3	59.9	59.9	59.9	55.8	56.8	57.9	58.6

Includes contingent exposures.

3.4 Liquidity management

The Group's liquidity position is sound, with a balanced funding structure.

In 2025, the funding gap remained stable, recording similar growth in both lending volumes and customer funds. The outstanding nominal balance of instruments issued on capital markets declined compared to the end of 2024, as a portion of the maturities and early repayments on senior debt and senior non-preferred debt trades were not replaced by new issues. The issues of mortgage covered bonds, asset-backed securities, subordinated debt and preferred securities, in aggregate, showed an outstanding nominal balance slightly higher than in the previous year. In 2025, in order to keep an adequate level of instruments above regulatory requirements, specifically the Minimum Requirement for own funds and Eligible Liabilities (MREL), several instruments were issued on capital markets (senior non-preferred debt and Additional Tier 1 (AT1)). The Group's LtD ratio as at 31 December 2025 was 93.5% (93.2% as at 31 December 2024).

The Institution has made use of the different issuance windows to access the capital markets at different times of the year, successfully completing the issuance plan, in an environment in which inflation has continued to cool and central banks have eased their monetary policies by cutting interest rates. Maturities and early repayments in capital markets over the year amounted to 4,375 million euros.

In 2025, Banco Sabadell placed several issues on the market. On 28 March 2025, it conducted one private issuance of mortgage covered bonds under the non-equity securities prospectus, in the amount of 500 million euros with an 8-year maturity. Under the EMTN programme, it issued two senior non-preferred debt deals amounting to a total of 1 billion euros, specifically: on 18 February 2025, it issued one 500 million euro deal with an 8-year maturity and an option for Banco Sabadell to call early in the seventh year; and on 10 September 2025, it issued one 500 million euro deal with a 6.5-year maturity and an option for Banco Sabadell to call early after 5.5 years. Furthermore, on 20 May 2025, Banco Sabadell issued one trade of preferred securities contingently convertible into the Bank's ordinary shares (Additional Tier 1), amounting to 1 billion euros with a fixed coupon rate of 6.5%.

In addition, in 2025 Banco Sabadell, after obtaining the relevant authorisations, exercised the early redemption options on the following issues: (i) Subordinated Debt 1/2020 on 17 January 2025, for 300 million euros, (ii) Senior Non-Preferred Debt 1/2022 on 24 March 2025, for 750 million euros, (iii) Senior Non-Preferred Debt 2/2022 on 8 September 2025 for 500 million euros, and (iv) Subordinated Debt 1/2016 for 500 million euros. For the last of these issues, Banco Sabadell submitted a bid to buy back the full issuance amount, resulting in a repurchased amount of 311.5 million euros on 11 July 2025 and, subsequently, on 13 August 2025, it exercised the redemption option on the remaining outstanding amount (188.5 million euros) due to a capital event, as established in the issue's conditions (instrument released in 2016 under UK law with no contractual recognition of bail-in, meaning that it ceased to qualify as capital on 28 June 2025).

Lastly, on 18 December, Banco Sabadell announced that, as it had obtained the corresponding authorisation, it would exercise the early redemption option to call the Subordinated Debt 1/2021 series, amounting to 500 million euros, on the first call date, 15 January 2026.

Lastly, TSB Bank issued one 600 million euro 5-year mortgage covered bonds trade on 18 February 2025.

After the December closing, Banco Sabadell issued one mortgage covered bonds deal under the Fixed Income Programme amounting to 500 million euros, a 6.8-year maturity and a 2.875% coupon.

Moreover, in 2026, after obtaining the corresponding authorisations, Banco Sabadell announced, (i) on 27 January 2026, that it would be exercising the early redemption option on the Senior Preferred Debt 2/2020 series, amounting to 500 million euros, on the first call date, 11 March 2026, and (ii) on 3 February 2026, that it would be exercising the early redemption option on the AT1 1/2021 series amounting to 500 million euros on the first call date, 15 March 2026.

In relation to securitisation transactions, on 25 February 2025, the traditional securitisation fund TDA Sabadell RMBS 5, F.T. set up by Banco Sabadell was disbursed under its residential mortgage-backed securities programme for a total of 3.5 billion euros. The issuance consisted of two tranches, which were fully retained by Banco Sabadell, with the senior tranche, initially amounting to 3.43 billion euros, deemed eligible as collateral to raise liquidity through the Eurosystem monetary policy instruments. This transaction was combined with the early unwinding of the securitisation fund TDA Sabadell RMBS 4, F.T. on 14 February, whose securities had been retained in full.

On 19 September 2025, the securitisation fund SCF Autos 2, F.T. was disbursed; this was the second operation carried out under the programme of auto loans granted by Sabadell Consumer Finance, amounting to 750 million euros. The fund issued six tranches of securities, all of which were placed on the market, with the exception of the tranche used to finance the reserve fund and initial expenses, which was retained by Sabadell Consumer Finance, and part of the senior tranche, which is eligible for use to raise liquidity through the Eurosystem monetary policy operations and which was subscribed by Banco Sabadell.

The Institution has maintained a liquidity buffer in the form of liquid assets to meet potential liquidity needs.

In terms of the LCR, since 1 January 2018, the regulatory required minimum LCR has been 100%, a level amply surpassed by all of the Institution's Liquidity Management Units (LMUs). The TSB and Banco Sabadell Spain LMUs have a level of 205% and 209%, respectively, as at 31 December 2025. At the Group level, the LCR remained well above 100% on a stable basis at all times throughout the year, ending 2025 at 186%. As for the Net Stable Funding Ratio (NSFR), which came into force on 28 June 2021, the Institution has remained steadily above the minimum requirement of 100% in all LMUs. As at 31 December 2025, the NSFR stood at 151% for the TSB LMU, 133% for Banco Sabadell Spain and 139% at the Group level.

The key figures and basic liquidity ratios reached as at the end of 2025 and 2024 are shown below:

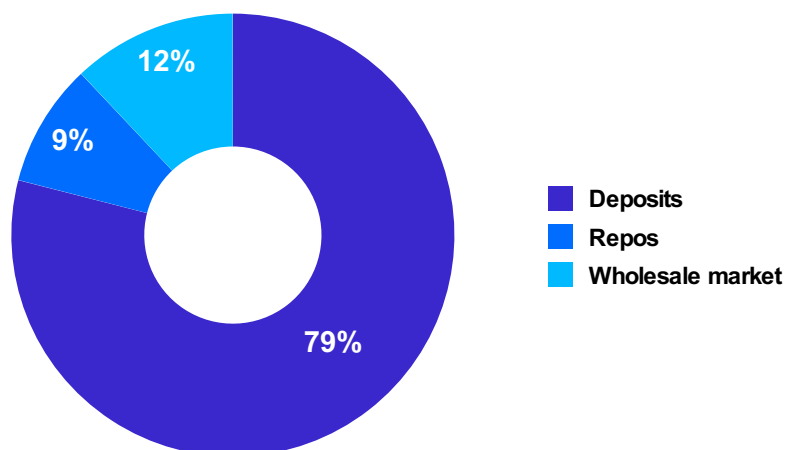
Million euro

	2025	2024
Gross loans to customers, excluding reverse repos	164,864	161,717
Impairment allowances	(2,498)	(2,844)
Brokered loans	(1,300)	(884)
Net loans and advances excluding ATAs, adjusted for brokered loans	161,066	157,988
On-balance sheet customer funds	172,265	169,557
Loan-to-deposit ratio (%)	93.5	93.2

The EUR/GBP exchange rate applied to the balance sheet is 0.8726 as at 31 December 2025 and 0.8292 as at 31 December 2024.

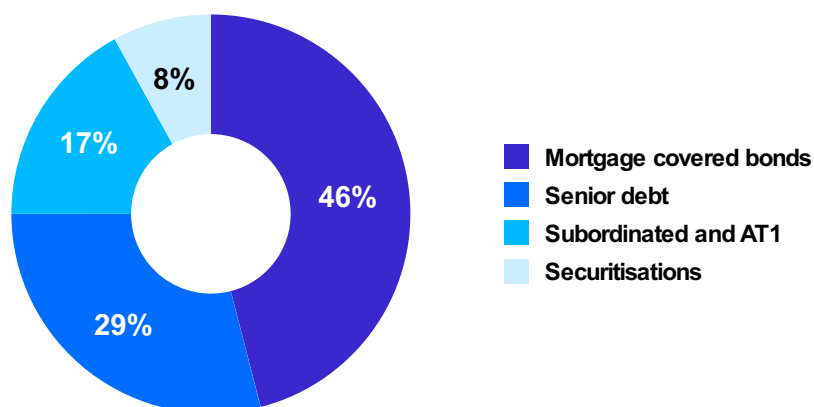
The main sources of funding as at 2025 year-end are shown below, according to the type of instrument and counterparty (in percentages):

Funding structure (*)



(*) Without accrual/deferral adjustments or hedging derivatives.

Details of institutional issues (*)



(*) Without accrual/deferral adjustments or hedging derivatives.

For further details about the Group's liquidity management, liquidity strategy and liquidity performance during the year, see Note 4.4.3 to the 2025 consolidated annual financial statements.

3.5 Capital management

Key capital figures and solvency ratios

Thousand euro

	31/12/2025		31/12/2024	
	Fully-loaded (*)	Phase-in	Fully-loaded	Phase-in
Common Equity Tier 1 (CET1) capital	10,547,426	10,542,780	10,485,795	10,485,795
Tier 1 (T1) capital	13,297,426	13,292,780	12,235,795	12,235,795
Tier 2 (T2) capital	1,310,691	1,310,691	1,945,475	1,945,475
Total capital (Tier 1 + Tier 2)	14,608,116	14,603,470	14,181,270	14,181,270
Risk-weighted assets	80,454,490	80,110,695	80,484,738	80,484,738
CET1 (%)	13.11%	13.16%	13.03%	13.03%
Tier 1 (%)	16.53%	16.59%	15.20%	15.20%
Tier 2 (%)	1.63%	1.64%	2.42%	2.42%
Total capital ratio (%)	18.16%	18.23%	17.62%	17.62%
Leverage ratio	5.41%	5.40%	5.20%	5.20%

In 2025, following the entry into force of the new provisions of Regulation (EU) 575/2013, the Group applied the transitional arrangements established therein, which concern the calculation of Expected Loss (EL), equity RWAs, and the RWAs of commitments that can be unilaterally cancelled through the STD approach. In 2024, the transitional arrangements arising as a result of IFRS 9 and still in effect had no impact on the Institution's solvency ratios.

(*) Fully-loaded data applying the output floor's regulatory implementation timeline.

During 2025, the Group increased its capital base by 427 million euros in fully-loaded terms.

In 2025, Banco Sabadell issued preferred securities contingently convertible into ordinary shares (AT1 CoCos) for 1 billion euros, in a transaction executed on 20 May 2025. Similarly, in relation to Tier 2 capital, in December 2025, following the announcement to the market of the intention to exercise the early call option, the Institution ceased to recognise the Subordinated Debt 1/2021 series, for a nominal amount of 500 million euros and maturing in April 2031, as Tier 2 capital. Once the corresponding regulatory authorisation has been received, the outstanding amount was redeemed in January 2026, as per the conditions of the prospectus. Lastly, also with a negative impact, it is worth noting the loss of eligibility of the Subordinated Debt 1/2016 issuance from 28 June 2025 onwards, according to that set forth in Article 494b of the CRR, as this is an instrument issued prior to 27 June 2019. As at 31 December 2024, this issuance contributed 134 million euros to Tier 2.

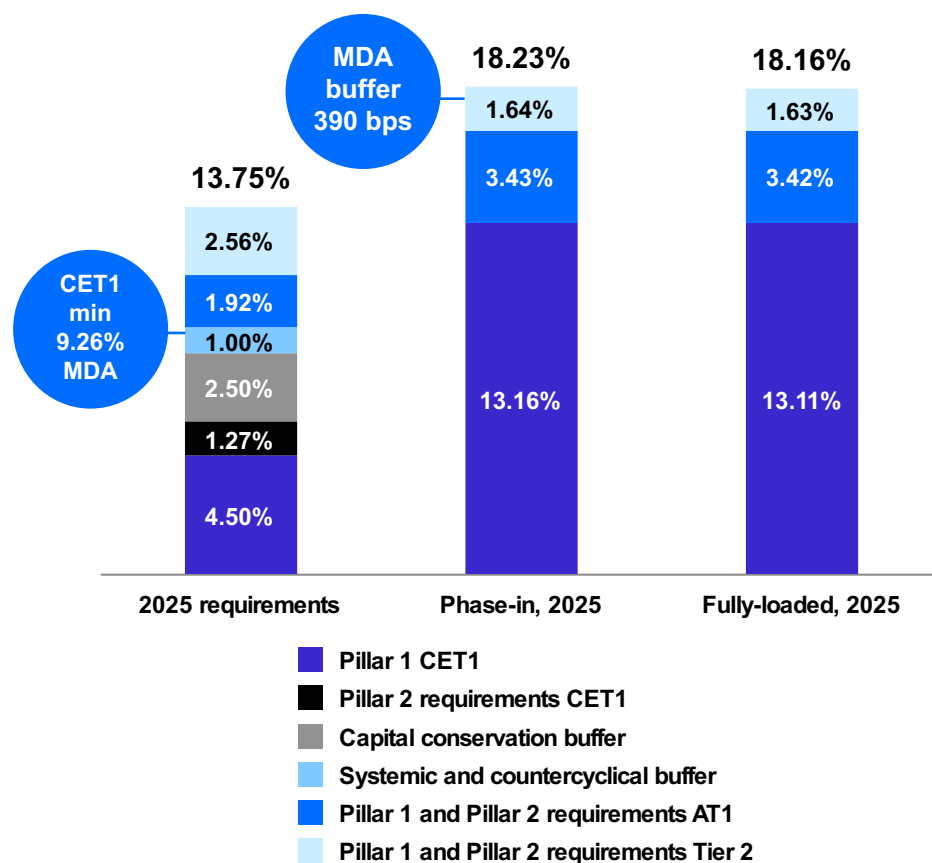
In terms of Risk-Weighted Assets (RWAs), three securitisations were carried out during the year: one synthetic securitisation (Galera IV) carried out in May 2025 on a 1.3 billion euro portfolio of loans to SMEs and corporates; one traditional securitisation (Autos 2) carried out in September 2025 on a 758.5 million euro consumer loan portfolio; and one synthetic securitisation (Boreas III) carried out in December 2025 on a 1,443.1 million euro portfolio of project finance and loans to large corporates. Furthermore, the synthetic securitisation Galera II was fully unwound in March 2025.

RWAs declined during the year, mainly due to the impact of the entry into force of CRR III on 1 January 2025. Excluding the impact of CRR III, credit RWAs remained practically stable, as improvements in portfolio density, the securitisations executed and currency movements helped

absorb the growth in lending and the impacts on RWAs stemming from planned future model updates that the Institution has decided to frontload. Lastly, the increase in operational RWAs due to the growth of net interest income over the period is worthy of note.

As a result, the fully-loaded CET1 ratio stood at 13.11% as at the end of 2025.

As at 31 December 2025, the Group had a phase-in CET1 capital ratio of 13.16%, well above the requirement established in the Supervisory Review and Evaluation Process (SREP), which for 2025 was 9.26%, meaning that the aforesaid ratio is 390 basis points above the minimum requirement.



Minimum capital requirements have been calculated taking into account capital requirements in effect as at 2025 year-end for Pillar 1 (8.00%) and Pillar 2R (2.25%), as well as the capital conservation buffer (2.50%), countercyclical buffer (0.75%) and the buffer for other systemically important institutions (0.25%).

In May 2024, the Single Resolution Board (SRB) published the MREL Policy under the Banking Package, which integrates the regulatory changes of the aforesaid resolution framework reform. The new requirements of the SRB are based on balance sheet data as at December 2023 and set the final MREL target, which is binding from 17 December 2024, the same day on which Banco Sabadell received a communication from the Bank of Spain regarding the decision made by the SRB concerning the Minimum Requirement for own funds and Eligible Liabilities (MREL) and the subordination requirement applicable to the Institution on a consolidated basis.

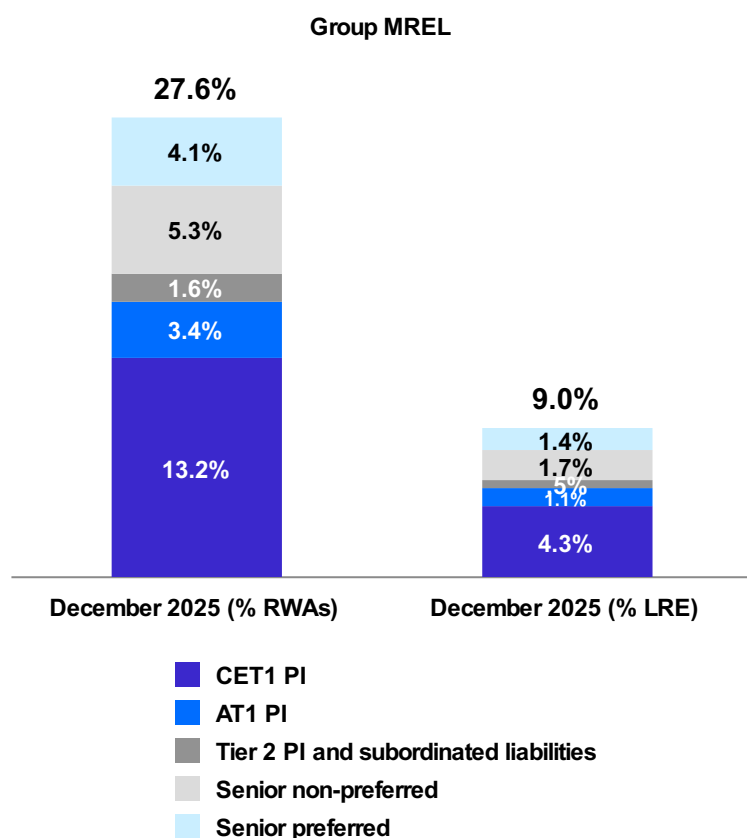
The requirements that must be met from 17 December 2024 are as follows:

- The MREL is 22.14% of the Total Risk Exposure Amount (TREA) and 6.39% of the Leverage Ratio Exposure (LRE).

- The subordination requirement is 15.84% of the TREA and 6.39% of the LRE.

The own funds used by the Institution to meet the Combined Buffer Requirement (CBR), comprising the capital conservation buffer, the systemic risk buffer and the countercyclical buffer, will not be eligible to meet the MREL and subordination requirements expressed in terms of the TREA.

As at the end of 2025 and 2024, Banco Sabadell is compliant with the applicable requirements. Furthermore, the Institution's Funding Plan anticipates that it will continue to comply, comfortably, with the current requirements.



The RWAs percentage includes the capital earmarked to meet the CBR. This serves as a mechanism to accumulate capital to protect against cyclical and structural systemic risks, in order to build up own funds during periods of prosperity and thus be able to protect the regulatory minimum during periods of adverse economic conditions.



Businesses



98	Banking Business Spain
131	Banking Business United Kingdom
135	Banking Business Mexico

Businesses

The key financial figures associated with the Group's largest business units are shown below, in line with the segment information described in Note 38 to the consolidated annual financial statements for the financial year 2025.

4.1 Banking Business Spain

4.1.1. Key figures

Net profit in 2025 amounted to 1,394 million euros, representing a year-on-year decrease of 8.1%, as 2024 included 115 million euros net of non-recurring impacts. Not including these impacts, net profit would be in line with the previous year.

Net interest income amounted to 3,411 million euros as at the end of 2025, falling by 6.6% year-on-year, mainly as the result of a reduced credit yield and a smaller contribution by credit institutions, which were impacted by lower interest rates.

Net fees and commissions stood at 1,268 million euros, 3.0% more than at the end of 2024, mainly due to the increase in asset management and insurance fees.

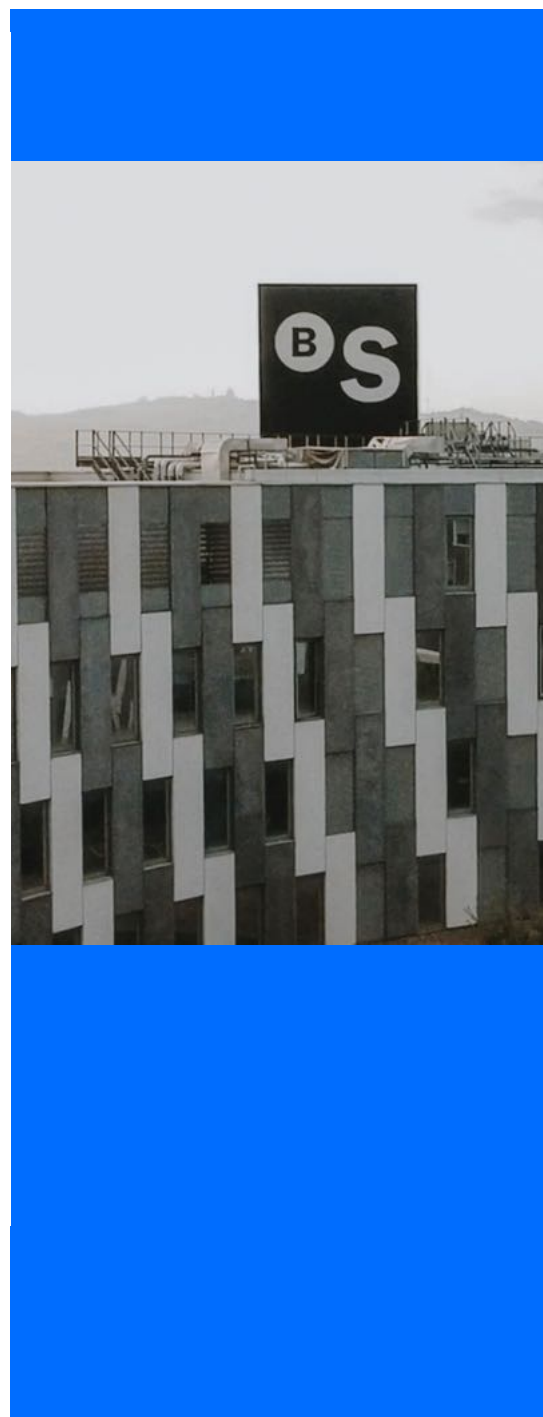
Profit or loss on financial operations and exchange differences fell by 22 million euros, mainly due to an offer to buy back subordinated bonds and the currency hedge on the sale price of TSB.

Equity-accounted income and dividends showed year-on-year growth of 8.9%, due mainly to the increased contribution of the insurance business.

The positive year-on-year variation is mainly attributable to the bank levy, whose last year of validity was 2024, and which generated an expense of 192 million euros in that year. In 2025, the tax on net interest and commission income of certain financial institutions came into effect, amounting to 123 million euros, which was recognised under the Corporation tax line item.

In addition, after the strategic deal signed between Nexi S.p.A. and Banco Sabadell (see Note 2 to the consolidated annual financial statements for 2025) came to an end in October 2025, certain expenses related to the assets of the subsidiary Paycomet, which in 2024 were recognised under provisions, were instead recognised as depreciation expenses as at the end of 2025.

Provisions and impairments amounted to 472 million euros, down by 27.6% year-on-year, mainly due to the improvement in both credit provisions and real estate provisions.



Million euro

	2025	2024	Year-on-year change (%)
Net interest income	3,411	3,652	(6.6)
Net fees and commissions	1,268	1,231	3.0
Core revenue	4,679	4,883	(4.2)
Profit or loss on financial operations and exchange differences	(22)	36	(161.3)
Equity-accounted income and dividends	181	166	8.9
Other operating income and expenses	(82)	(249)	(67.0)
Gross income	4,755	4,836	(1.7)
Operating, depreciation and amortisation expenses	(2,154)	(2,071)	4.0
Pre-provisions income	2,601	2,765	(5.9)
Provisions and impairments	(472)	(652)	(27.6)
Capital gains on asset sales and other revenue	(34)	(14)	137.7
Profit or loss before tax	2,096	2,098	(0.1)
Corporation tax	(700)	(579)	20.8
Profit or loss attributed to minority interests	2	2	(0.9)
Profit attributed to the Group	1,394	1,517	(8.1)
Cumulative ratios			
ROTE (net return on tangible equity)	14.4 %	15.9 %	
Cost-to-income (administrative expenses / gross income)	45.3 %	35.1 %	
NPL ratio	2.7 %	3.3 %	
Stage 3 coverage ratio, with total provisions	69.9 %	66.3 %	

Gross performing loans increased by 4.9%, growing across all segments, particularly the mortgage book.

On-balance sheet customer funds increased by 3.5% year-on-year, while off-balance sheet funds grew by 14.0%, mainly due to mutual funds and third-party insurance products.

Million euro

	2025	2024	Year-on-year change (%)
Assets	186,300	177,348	5.0
Gross performing loans to customers	114,669	109,291	4.9
Non-performing real estate assets, net	434	497	(12.8)
Liabilities and equity	186,300	177,348	5.0
On-balance sheet customer funds	128,598	124,235	3.5
Wholesale funding in capital markets	19,531	21,135	(7.6)
Allocated own funds	11,375	12,161	(6.5)
Off-balance sheet customer funds	52,656	46,171	14.0
Other indicators			
Employees	13,617	13,525	0.7
Branches and offices	1,149	1,152	(0.3)

Details of the main business lines within Banking Business Spain are given here below.

4.1.2. Retail Banking

4.1.2.1. Business overview

Retail Banking is Banco Sabadell's business unit that offers financial products and services to individuals for personal use. The business is based on a banking model that combines processes typical of a digital bank for interactions that require the autonomy, immediacy and simplicity that only digital channels can offer with specialised and personalised commercial management for those interactions where expert support is needed, provided through the branch network, both in brick-and-mortar branches and remotely.

Among the main products offered, it is worth noting investment and financing products in the short, medium and long term, such as consumer loans and mortgages. As for funds, the main products on offer are customer term and demand deposits, savings insurance, mutual funds and pension plans. In addition, the value proposition is supplemented with essential services such as payment methods, particularly cards, and a comprehensive suite of various kinds of insurance products.



4.1.2.2. Management milestones in 2025 and priorities for 2026

Retail Banking bases its activity on the following pillars that contribute to the objective of increasing the base of transactional customers, gaining market share in key products and providing first-class services to customers:

- Product-based organisation, which makes it possible to focus on customers' needs and to offer specialised and personalised products and services, enabling greater autonomy, immediacy, agility and simplicity.
- The specialised sales force, supported by the branch network, allows a superior customer support model to be offered for products where customers require more advice or support from experts, such as mortgages, protection insurance and savings/investment.
- The development of digital capabilities in relation to servicing, the attraction of digital demand, and the generation of digital sales in self-service and remote channels.

In that regard, in 2025 the Retail Banking business has continued with its transformation, moving forward in the following areas:

- Continue to expand the customer base, focusing on digital onboarding whilst also improving customer experience across all channels.
- Consolidate the new direct banking capabilities, with a value proposition adapted to new customer habits and an increase in scalability and efficiency.
- Serve the Bank's customers through their preferred channel. On this point, it is worth noting the popularity of the mobile app, which has consolidated itself as the primary interaction channel for serving customers.
- A remarkable improvement in customer experience rankings, enhancing the quality of interactions with them, which forges long-lasting and quality relationships whilst promoting the brand, increasing its visibility and awareness to gain market share.

It is clear that the transformation has been consolidated in 2025, with Retail Banking now undeniably a profitable business, with improved customer perception and a solid foundation from which to grow steadily going forward.

In 2026, the business priorities centre around continuing to grow in a profitable way, leveraging the transformation to that end and with a larger number of engaged customers during the first few months of the relationship. In addition, the focus will remain on continuing to improve brand appeal and customer experience in all channels.

4.1.2.3. Main products

The main Retail Banking products are described here below:

Mortgages

In 2025, the mortgage market was characterised by expansion, with the amount granted through new mortgage loans growing by a cumulative 17%.

This growth was driven by lower interest rates, in terms of both the 12-month Euribor and the mortgage rates offered by financial institutions. This development helped to ease the burden of monthly loan instalments, thus enabling the growth of the real estate market.

Against this backdrop, fixed-rate mortgages in Banco Sabadell cemented their position as the preferred product of its customers, accounting for 90% of total new mortgage contracts as at the end of 2025. This preference is explained by customers' search for stable

borrowing conditions, given the uncertain economic environment, as well as protection against future hikes in benchmark rates. Similarly, discount mortgages, including both fixed-rate and floating-rate, represented 86% of the total as at the end of 2025.

Banco Sabadell has continued to strengthen its competitive position in the mortgage market by adopting several key initiatives:

- Larger market share: the Institution has managed to increase its market share, thanks to competitive mortgage deals adapted to the needs of customers and backed by an effective commercial strategy.
- Specialised distribution model: all of the Bank's branches have been brought into the model of mortgage specialists, firmly committing to remote management. At present, 234 specialists operate remotely, covering 100% of the branch network, which allows for greater capillarity and operating efficiency.
- Overhauled mortgage process: progress has been made in digitalising and simplifying the mortgage application process, shortening processing times and improving customer experience, providing greater agility to the management of demand and help to optimise internal resources.
- Enhanced digital experience: new technological and business intelligence capabilities have been added to the initial phase of customers' digital journey, intended to optimise customer onboarding and increase lead conversion rates, thereby making the customer experience more efficient and personalised.

Consumer Loans

In terms of consumer loans, 2025 was characterised by a 20% increase in volume in the Retail Banking segment, driven by the expansion and improvement of digital product arrangement capabilities, particularly in reactive products, and the adaptation of the product range to the needs of the end-consumer through the use of advanced intelligence models, always ensuring adequate risk management and segmentation.

At present, 87% of origination takes place through remote channels (58% in digital self-service), while pre-approved loans account for 84% of total origination in euros.

Payment Services

2025 has been a good year in terms of the growth of payment card activity, with a 6% year-on-year increase in net turnover, reaching 21,846 million euros.

In 2025, the instant card issuance process was further consolidated, allowing customers who apply for a new card to have it immediately available for use in e-commerce and mobile payment transactions. Furthermore, in July the possibility of immediate card activation was introduced across all in-branch channels, thereby enhancing the agile and digital experience. The percentage of card activations executed via digital channels already accounts for 56% of total activations, while 25% of purchases are made with mobile payments.

With regard to the Bizum payment system, Banco Sabadell has more than 1.7 million registered users.

Demand Deposits

In 2025, Banco Sabadell consolidated its position in the demand deposits market, strengthening its ability to attract new customers and create engaged customers, thanks to a competitive proposition both in the digital channel and in its network of branches.

After launching the digital onboarding process in 2023, which improved its business productivity and customer experience, the Sabadell



Online Account was revamped in 2024, expanding its scope to also cover the self-employed segment. This helped turn the account into a comprehensive solution for customers looking for their main bank to cater to both their personal and professional needs.

This strategy was consolidated in 2025, with sustained growth in digital applications for products and improved levels of customer engagement, thanks to an offer that combines simplicity, accessibility and added value. The proposal was reinforced with specific campaigns and improved user experience in digital channels, remote channels, and in-person channels.

The main demand deposit accounts offered are the following:

- Sabadell Online Account: aimed at new retail customers and self-employed professionals, with a 100% digital opening process.
- Sabadell Account: for retail customers, available through all channels.
- Key Account: designed for non-resident foreign customers.

There is also still a complementary offer for groups with specific needs, such as minors, non-residents and people at risk of financial exclusion, through the Basic Payment Account.

Savings and Investment

The market volatility brought about by the announcement of further tariff increases in the international context, together with the actions taken by the main central banks, in turn closely linked to the publication of economic data, have shaped asset performance and, by extension, the profitability of investment funds.

In mutual funds, the main milestones during the year were the following:

- The mutual funds range was adapted to the market situation and to customer demand by incorporating the following types of products:
 - Guaranteed products: in 2025, the guaranteed funds programme centred on the *Sabadell 12M Garantizado* guaranteed product range, comprising daily-liquidity funds. This range was supplemented with the launch of two new vehicles, *Sabadell 12M Garantizado Marzo* and *Sabadell 12M Garantizado Octubre*, and the guarantees on *Sabadell 12M Garantizado* and *Sabadell 12M Garantizado Diciembre* were renewed for another year.
 - Discretionary fund portfolio management: a key service for the funds on offer. The revitalised portfolio management service, *Cartera Sabadell*, is now even more important for customers wishing to delegate their investment decisions to specialists, according to their risk profile and objectives. Three different types of portfolios are available to start investing, with the option to choose between five strategies with different levels of risk:
 - Sabadell Portfolio (*Cartera Sabadell*): with a percentage of equities of 25%, 50% and 75%.
 - Sabadell Plus Portfolio (*Cartera Sabadell Plus*): with a percentage of equities of 10%, 25%, 50% and 75%.
 - Sabadell Private Portfolio (*Cartera Sabadell Privada*): with a percentage of equities of 10%, 25%, 50%, 75% and 90%.

An exclusive investment option for Sabadell Private portfolios (profiles: 50, 70 and 90) and Sabadell Plus portfolios is also now available.

- Charitable products: in order to boost the *Sabadell Inversión Ética y Solidaria* charitable fund, given the growing interest in this type of fund, its contribution to charitable causes has been increased and the management fee percentage has been reduced, at the same time expanding the opportunities available to customers to increase their returns.



- Workflows have continued to be worked on, in order to enhance customer experience in the digital channel.

In relation to savings insurance products, these saw an increase in 2025, especially insurance products with a guaranteed interest rate, mainly the Sabadell Savings Insurance (*Seguro de Ahorro Sabadell*) product, thanks to promotional campaigns. This insurance product guarantees a net interest rate that is revised every six months, with full and partial availability, flexible contributions, and zero costs or fees. Promotional campaigns have also been launched to encourage applications via remote channels and combinations with protection insurance.

With regard to the pensions business, as well as guaranteed return insurance plans, the trend followed by interest rates has boosted demand for Insured Retirement Plans (IRPs) with longer payback periods. To sell individual pension plans, campaigns have been continued, offering very competitive incentives to acquire pension plans from other institutions. This year saw the consolidation of sales of simplified occupational pension plans for the self-employed, first brought to market in 2024, which permit higher contributions than individual plans and are promoted by the Professional Union of Self-Employed Workers (Unión Profesional de Trabajadores Autónomos, or UPTA) and the General Council of Economists (Consejo General de Economistas).

With regard to deposits, this year Banco Sabadell has consolidated its value proposition, maintaining a stable range of products adapted to the needs of customers, both in the branch network and on the digital channel. The Bank offers products that combine profitability, simplicity and easy access.

The strategy has focused on offering term savings, especially to customers with a digital profile, strengthening the online channel as the preferred means of applying for these products, thanks to its agility and the continuously improving user experience.

The key products during the year include the *Depósito Crecimiento* and *Depósito Líder* deposits, which offer flexible options for different savings horizons. The offer is completed with the *Depósito Sabadell Bonificado* product, a deposit that pays more interest the higher the level of customer engagement, measured by the products that they hold either at the time of opening the deposit or that they acquire thereafter.

Similarly, the range of online deposits has been expanded, with new terms to maturity now available, consolidating the digital channel as a key lever in the Bank's commercial transformation strategy.

Lastly, throughout the year, the range of structured deposits has been kept in line with the target levels of both deposits gathered and deposits retained.

Protection Insurance

The products offered by the insurance business are designed to meet various protection needs, in relation to both personal liability and assets, always seeking to adapt each type of product to the profile of each Retail Banking customer. The insurance business also focuses on obtaining the highest levels of customer satisfaction every time a product is used.

Customers mainly subscribe to the insurance products distributed by the Group through the insurers in which the Group holds a 50% stake thanks to the agreement between Zurich Group, BanSabadell Vida and BanSabadell Seguros Generales. The first of these insurers, which has the largest business volume, occupies the top spots of insurance firm rankings, based on premiums issued and technical provisions. In addition, BanSabadell Seguros Generales has entered into co-insurance agreements with Sanitas and Meridiano Seguros for health insurance and funeral insurance, respectively.

These products are marketed by various qualified figures, notably by insurance specialists, and through various channels, both on-site and remote.

In 2025, the business has continued to grow steadily in protection premiums (which are up 10% on the previous year), the main products that contribute to this business being life insurance, home insurance and health insurance, which recorded growth rates compared to the previous year of 10%, 10% and 18%, respectively.

In addition, in order to keep offering customers high-quality products and services, towards the end of the year a new range of life and home insurance products was launched, offering various options and premium payment formulas in order to offer the best coverage according to the existing needs of each customer. Within this new product range, it is worth mentioning Zenit, which allows customers to keep the same premium during the first three years, without it increasing.

Sabadell Consumer Finance

Sabadell Consumer Finance is the Group's company specialising in consumer finance at the point of sale. It carries out its activity through various channels and lines of business via cooperation agreements.

In 2025, activity in the automotive business continued to record growth in the region of 7%, and the alliances with big dealer groups were also reinforced.

Progress continues to be made in the realm of digital transformation, consolidating the levels of finance granted directly through the Institution's point-of-sale devices through Instant Credit.

In 2025, Sabadell Consumer Finance executed more than 245,000 new transactions through more than 18,000 points of sale located throughout Spain, which translated into an inflow of new investments amounting to 1,797 million euros. With this, the total outstanding exposure of Sabadell Consumer Finance comes to 2,860 million euros.

4.1.3. Business Banking

4.1.3.1. Business overview

The Business Banking unit offers financial products and services to legal and natural persons for business purposes, serving all types of companies with turnover of up to 200 million euros, as well as the institutional sector. The products and services offered to companies are based on short- and long-term funding solutions, solutions to manage cash surpluses, products and services to guarantee the processing of day-to-day payments and collections through any channel and in any geographical area, as well as risk hedging and bancassurance products.

Banco Sabadell has a clearly defined relationship model for each business segment, which is innovative and sets it apart from its peers and which allows it to be very close to its customers, acquiring in-depth knowledge of its customer base whilst at the same time offering a strong level of engagement.

Companies with turnover in excess of 2 million euros are mainly managed by specialised branches. All other companies, which include SMEs, small businesses and self-employed persons, are managed by standard branches. All of these companies have relationship managers who specialise in their respective segments, as well as access to expert advice from product and/or sector specialists.

This all enables Banco Sabadell to be a yardstick for all companies, as well as a leader in customer experience.



4.1.3.2. Management milestones in 2025 and priorities for 2026

In 2025, the Business Banking unit focused its management efforts on strengthening the strategic courses of action established for each segment, in accordance with the Strategic Plan. This approach is reflected in a significant improvement in the profitability and specialisation of the large corporates and SMEs segments, through specialised solutions tailored to customers, and in the framework's enhancement and the risk function's rapid optimisation of the portfolio's credit profile. The branch network's specialisation has helped to improve the business's cost of risk and Return on Tangible Equity (ROTE).

Furthermore, the development and enhancement of the sector's commercial offering aimed at small businesses and self-employed persons constituted another key management milestone during 2025, successfully consolidating the Bank's position as a leading specialist in the market for this segment.

In 2026, Business Banking will face a series of key challenges that will set the course for its strategy in the coming years. Efforts will be made to boost the growth of the customer base and the profitability of the various segments, endeavouring to optimise operational efficiency and the range of specialised products and services so as to meet the specific needs of each customer. Particular emphasis will be placed on improving cost of risk, implementing proactive measures to mitigate risks and make the portfolio more robust.

In addition, the Institution's commitment to excellence in customer experience will be a core pillar. Significant initiatives will be undertaken, designed to improve customer interactions and satisfaction across all segments, from large corporates to self-employed persons.

Lastly, the Institution aims to consolidate and cement its position as the leading bank for its business customers. This goal will be achieved with high-quality financial solutions, the cornerstones of the approach being innovation, specialisation, and customer centricity and proximity.

The different segments, specialists and commercial products that fall within Business Banking are described here below.

4.1.3.3. Segments

Corporates & SMEs

2025 has been the year in which the changes to the management model implemented in early 2024 have solidified. The main pillars of the management model are the following:

- Branches for large corporates: 32 branches specialised in companies with turnover in excess of 10 million euros, staffed with 200 relationship managers, some of them with a portfolio specialised in companies from the most representative sectors within their area of activity.
- Business teams: 31 teams with over 300 relationship managers dedicated to strengthening the management of companies with turnover between 2 and 10 million euros, with commercial strategies focused on their needs. These teams also include startup managers, who are specialists in this customer segment.
- These managers and companies are also supported by more than 200 product specialists and experts on the agricultural and tourism sectors.
- Business operation centres: a servicing model that fosters a stable, trustworthy personal relationship with each company through a dedicated expert, ensuring agile and professional communication.

- The Preferential Care Service for Business Banking Customers (*Servicio de Atención Preferente Empresas*, or SAPE): a centralised service that allows companies to reach team members specialised in their day-to-day transactions and operations, either by phone or through the Customer Care Space via BSOOnline for text-based support. These managers respond to requests immediately. Most of these requests are regarding their online transactions and activities.
- Risk acceptance models: designed so that managers can be proactive when offering solutions and are able to respond to loan applications more quickly and efficiently.

This specialised management model is underpinned by a continuing education plan for relationship managers. This plan notably includes the Expert Programme for business banking managers, jointly developed and taught by the Business Institute, and the Sector Specialisation Programme.

2025 saw the launch of a new application designed to acquire companies in the 2-10 million euro turnover segment, leveraging artificial intelligence. The application generates a relationship manager sheet summarising key information on potential customers, making acquisition easier and more effective. This has boosted business customer acquisition in this segment by 50% compared to 2024.

In an economic environment marked by the geopolitical situation, this comprehensive customer management service has made it possible to support companies by adapting to their circumstances. Banco Sabadell has offered customers with liquidity needs access to both basic financing solutions and complex solutions with 360° value propositions. In addition, it proactively managed companies with surplus cash.

For customers that are growing, Banco Sabadell has remained by their side with specialised lending solutions typical of the middle market, acting either alone or in a pool with other credit institutions. In this respect, structured finance transactions have been boosted in the areas of corporate finance, property and commercial real estate finance, LBOs, and project finance for energy and infrastructure. Services in the Investment Banking area have also been expanded, offering advice on transactions involving direct lending, M&As, bonds and commercial paper, among others.

All this has been reinforced with a communications and media plan to strengthen Banco Sabadell's position and leadership as the bank for corporates. This leadership is widely acknowledged by the industry and the market. To that end, the brand has been featured repeatedly in national and regional economic media. This presence has been accompanied by the ceremony for the 2025 Banco Sabadell Business and Entrepreneur Awards, held in partnership with various editorial groups.

Customers recognise the customer-driven approach and the value of the people who interact with corporates, as reflected by the internal satisfaction surveys. A testament to this is that, during 2025, customers rated both their relationship managers and branch servicing staff above 9 on average.

Banco Sabadell has been by the side of corporates, managing the full gamut of needs of its customers to help them make the best financial decisions. In 2026, the sector-specific approach will be further enhanced, providing knowledge of the sector and of the market to customers, with a greater level of professionalism, adding more value for both parties. All these initiatives have been implemented with the aim of supporting companies in order to become their main financial partner.

Small Businesses

Banco Sabadell continues to support self-employed persons, retailers and small businesses, assisting both during their daily activities and with their new projects. The Bank remains focused on enhancing the value proposition for customers, strengthening its position as a specialist in the minds of customers of this segment. This is underpinned by the promotion and consolidation of a business methodology whose key component is a differential offering specifically designed for each activity sector.

The aim is to be able to offer each customer the solution that is best suited to them based on an understanding of the unique factors that shape their day-to-day activities, building a product offer by actively listening to customers and branch managers, professional groups and sector representatives, and ensuring that they really meet the identified needs. At present, the catalogue of specific solutions considers 36 different activity sectors, prioritising those that offer the greatest potential in the current economic environment.

In accordance with this sector specialisation framework and in order to apply it to the market in a tangible way, the approach to both existing and potential customers was enhanced in 2025 with the launch of sector campaigns. These initiatives serve to galvanise the commercial activity of specialist managers and help to give a much clearer and more powerful message about the Bank's value proposition for this segment, by specifically targeting an audience with common needs and interests. Clear examples of this have been the multi-sector campaign or the campaign aimed at the health and wellbeing sector, which delivered significant year-on-year increases in customer acquisition for these sectors. Both marketing campaigns had as a common denominator the concept of proximity and have been supported by the Smart PoS terminal and its wide range of solutions, such as the Smart Dual-Screen PoS or the Smart Mini PoS, the SoftPOS (an app that turns mobile phones into PoS terminals), as well as Instant Credit, a solution that makes it possible for merchants to finance their customers' sales directly through the PoS terminal.

In addition, during 2025, relationship managers specialised in assisting self-employed workers, retailers and small businesses were once again the most numerous and representative management figure of the entire branch network, thus demonstrating the Bank's clear vocation for and commitment to a customer segment that attaches great value to proximity and personalised assistance. New features were added to the management support system available to these relationship managers, designed to help them better understand the key aspects of each sector, thus providing the best response to customers' specific needs, including a university-accredited expert training programme on how to advise businesses and self-employed workers.

In parallel, and in line with the development and consolidation of new financial service consumption habits, Banco Sabadell continued to drive the digitalisation of customers, responding to their needs to transact and apply for new products and services using self-service channels, for example, by offering them the option to set up and access an online credit line for instant payments, and enhancing the remote customer care service for self-employed persons and small businesses (known as ANA), with excellent service and query resolution indicators.

On this topic, it is worth mentioning the consolidation of a digital channel to attract and engage self-employed customers launched during 2024, allowing the Bank not only to significantly increase its sources of customer acquisition but also to fill a gap in the market with a 100% online process for this segment, offering the best conditions in the market. It should also be noted that, during this year, customers were



able to arrange and draw funds from the LIPO credit line for instant payments via the Institution's digital channels.

In 2026, the main challenges in relation to this segment involve strengthening the specialisation of both the offering and managers; consolidating a digital model for the support, management and engagement of self-employed and small business customers that can guarantee the best customer experience by combining it with the capillarity of the Bank's branch network; and continuing to drive forward the sophistication of the value proposition in collections and payments, positioning it as a key product for this segment.

SabadellUrquijo Banca Privada

2025 marked the consolidation of the business model implemented in 2023. Banco Sabadell has set itself the objective of continuing to grow steadily in Private Banking and, to that end, it has undertaken an in-depth review of the value proposition, encompassing all products and services, making significant investments in technology, products, training and events, among other things.

The main growth vector has been the acquisition of new clients. With regard to the review of the value proposition, special attention has been paid to differentiated Private Banking products, such as alternative investments and discretionary portfolio management. Amundi, the Bank's strategic partner, has continued to play a key role, being instrumental in services such as Cartera Sabadell (Sabadell Portfolio), which continues to be extensively taken up by customers thanks to specialised management, adaptability to customers' risk profiles and its diversification. Following the launch of the new Cartera Sabadell service in April 2024 this service has, in 2025, become a key component of the value proposition, underpinned by strong business momentum that has increased the number of customers that already have this service in their portfolios. At the same time, the Bank has continued to improve the service by launching new communication channels with customers and upgrading the reporting features of the self-service channels, to make professional portfolio management simpler for customers.

With regard to the investment funds on offer, there are Sabadell Asset Management funds, with exclusive products for Banco Sabadell customers, and also Amundi Group funds, in addition to an extensive range of third-party funds. In 2025, the interest rate environment presented opportunities across the entire fixed-income spectrum. Money market funds and fixed-income funds with durations of up to three years, focused on investment-grade corporate bonds, have been the cornerstone of this offering. Because of this, the range of target return funds was expanded, offering different levels of risk. Additionally, a new range of 12-month guaranteed funds with daily availability of liquidity has been rolled out, which represents a novelty in the Spanish mutual fund market.

In parallel, new equity funds have been added to the range of options to encompass all the investment ideas proposed by the Strategy division, including themes such as the space economy, gold and the near-shoring of supply chains to developed countries.

In relation to savings insurance products, these saw an increase in 2025, especially insurance products with a guaranteed interest rate, selling more life annuities as part of a very competitive product range, supplemented with solutions for not paying capital gains tax on property transfers.

In terms of the transactional offer, products such as accounts and cards exclusively for Private Banking clients have been maintained, combined with the best benefits on offer in the Bank's product range. With regard to financing products, Private Banking clients have continued to have access to special prices, thus ensuring that these transactions

remain competitive for those clients, where financing transactions are a differentiating element and help to capture new funds from those clients. In addition, the specific risk management workflows created in 2023 for staff specialised in Private Banking have been operating efficiently and with excellent transaction approval times.

Urquijo Gestión continued to solidify its business model in 2025. This marks the second anniversary of the implementation of the new organisational structure, which involves a clear-cut assignment of responsibilities between the investment team and the customer management team. This segregation of duties enables greater specialisation and efficiency, augmenting the value proposition for customers.

With this new model, the custom discretionary portfolio management service consolidates its position as the core component of the product offer for high-net-worth Private Banking clients. These portfolios rest upon two fundamental pillars: active management, geared towards generating returns in the medium term; and a personalised premium service, led by an investment expert that adapts each portfolio to the specific profile of each customer. This approach makes offering truly individualised solutions possible. Currently, Urquijo Gestión manages over 1,450 unique portfolios, reflecting its commitment to personalisation and service excellence.

Business in 2025 has been particularly intense, both as regards its evolution – with strong growth in the number of portfolios and assets under management – and in proactive customer support. It is worth noting that this proactive support has been especially meaningful during times of financial market instability, where the role of the portfolio manager has been pivotal to maintain trust.

Being close to clients is key for SabadellUrquijo Banca Privada. In order to accompany them in their journeys, more than 160 events aimed at current and potential customers were organised in 2025. These activities included economic, cultural, sport and recreational experiences, reflecting its commitment to service excellence and personalised support and strengthening the relationship between client and banker.

Furthermore, in 2025, the Bank has been recognised by prestigious international organisations such as the Global Private Banking Awards, which recognised the Bank's work in the following categories: Private Banker of the Year – Europe, Best Private Bank for Multi-Asset Products, Best Discretionary & Advisory Service Offering, and Outstanding Client Experience in Wealth Management. These awards celebrate the outstanding work propelling Private Banking.

The enhanced value proposition has been reflected in indicators assessing client satisfaction with both their banker, rated with 9.30, and the Private Banking service, achieving a seven-point improvement in its NPS compared with 2024.

The Private Banking segment is a driver for Banco Sabadell's growth, and the Bank continues to be a leading institution in Spain when it comes to Private Banking.

Institutional Business

The goal of the Institutional Business division is to develop and enhance business with public and private institutions, positioning Banco Sabadell as a leading institution in this market.

Managing this line of business requires the specialisation of products and services in order to offer a comprehensive value proposition to government agencies, financial institutions, insurance firms and mutual insurance companies, as well as religious and third-sector organisations.

2025 was a very busy year for all institutional businesses. The high level of lending activity to government agencies and the management of customer funds in an environment of fierce price competition between the

main financial institutions were particularly noteworthy. The division had set itself the goal of increasing the volumes of lending and customer funds, improving the profitability of the various business lines. Banco Sabadell's position in these segments was strengthened, with greater commercial activity, more proximity and a wider range of proposed solutions, which resulted in an increase in customer onboarding, in the volume of business and in the margin generated through the offering of products with more added value for customers and for the Institution.

Public Institutions

Public institutions' economic activity in 2025 was marked by the growth of borrowing activity, driven by the growth in lending to the autonomous communities. It is also worth highlighting the increase in liquidity of the various general governments.

As regards deposits, it should be noted that there was a moderate fall in market share due to fierce competition in the market.

During 2025, the autonomous communities recovered credit thanks to the State's restructuring of debt operations with financial institutions, thus improving the cost of funding of those operations, which increased the CIRBE quota (quota of outstanding risk, provided by the Bank of Spain Central Credit Register) of the autonomous communities participating in the Autonomous Liquidity Fund.

Financial Institutions and Insurers

The Financial Institutions and Insurers division channels Banco Sabadell's range of value-added investment products aimed at this segment.

In 2025, given the economic environment, the focus was placed on boosting the marketing of alternative products. Generally speaking, the division managed the accounts' adjustment to lower interest rates, with a high percentage of conversions from fixed-rate accounts to indexed or variable-rate accounts. With regard to investment products, falls in interest rates have increased the appeal of long-duration bonds, especially in segments such as sovereign bonds, investment-grade credit and private debt.

Similarly, illiquid assets – such as infrastructure, real estate and private equity – have gained weight in portfolios due to their long-term profile, diversification benefits and lower correlation with traditional markets. Consequently, this division promoted the marketing of direct investment in renewable infrastructure and private debt among customers of this segment. In terms of investments via alternative funds, it is worth noting the launch of the fund of venture capital funds, Necta, as well as the positioning in relevant operations of the CRISAE senior debt fund and of the AURICA IV private equity fund.

Finally, there was a significant increase in investment in discretionally managed portfolios by customers of this segment.

Religious Institutions and the Third Sector

The Religious Institutions and Third Sector division offers customers a range of products and services adapted to the unique characteristics of these groups. They cover everything from transactions to specialist advice on financial assets.

Uptake of the DONE system for collecting charity donations, which works with contactless technology, continued to grow throughout the territory, helping non-profit organisations to raise funds for their projects. As at the end of December 2025, there are more than 1,000 installed devices that have received over 10 million euros in donations since this service was launched in 2019.

The Religious Institutions and Third Sector division coordinated the delivery of financial aid for the charitable causes supported by the Sabadell Inversión Ética y Solidaria, FI fund, managed by Sabadell Asset Management, and it also managed the payments made together with beneficiary offices and entities. This year, for the 24 charitable projects of the 24 entities selected by the Ethics Committee in 2024, almost 342 thousand euros were delivered, bringing the cumulative figure since this Committee was established in 2008 to over 3.6 million euros.

Furthermore, in 2025, the Ethics Committee selected a total of 22 humanitarian projects primarily focused on addressing risks of social and labour exclusion, improving the living conditions of people with disabilities and meeting their basic needs in terms of food, healthcare and education. Sabadell Asset Management will distribute this aid to these projects in 2026.

2025 also saw the completion of the network specialisation project for the Religious Institutions and Third Sector segment. Currently, there is a specialised branch in the Central Territorial division in Madrid with four specialists; a specialised branch in the Catalonia Territorial division in Barcelona with five specialists; and six specialists in the Eastern Territorial division, located across the Valencia, Castellon, Alicante, Murcia, Majorca and Ibiza branches.

4.1.3.4. Segment specialists

BStartup

Banco Sabadell's BStartup, a pioneer in the Spanish banking industry, is a company specialised in financial services for startups and scaleups. Since this unique project was launched 12 years ago, it has offered a comprehensive service of specialised banking and equity investment and it plays a very active role in the country's innovative entrepreneurial ecosystem.

Specialising in banking has been BStartup's mainstay from the outset. Its customers have a strong level of engagement; they are very international and their activities are often complex; they come from all segments and all sectors and have different business models, development pathways and financing needs. At present, specialisation is delivered by a team of 26 managers dedicated exclusively to startups and scaleups in the Territorial Divisions with the highest concentration of this type of company, in addition to 13 mixed managers, as well as its own risk team of 5 members and a team of 4 specialists that drive the business throughout Spain.

BStartup Hub Madrid, the first Banco Sabadell branch dedicated exclusively to startups, scaleups and their investors, celebrated its first year. A space of more than 600 square metres for entrepreneurs and technology, accommodating a team of 12 professionals who provide a comprehensive financial service specialised in startups. The space was also designed to serve as a meeting point for Madrid's entrepreneurial ecosystem, featuring an auditorium, meeting rooms and hot desks for customers. In its first year, it hosted 59 events (both its own and those organised by the entrepreneurial ecosystem) with over 3,400 attendees.

In terms of equity investment activity, BStartup is aimed mainly at early-stage tech-related companies with strong growth potential and with scalable and innovative business models. It invests in all types of sectors, above all in digital companies, and focuses on two specific verticals: BStartup Green, for startups which, through technology or digitalisation, contribute to the transition to a more sustainable world; and BStartup Health, already a firm leader in investment in early-stage healthcare industry startups. This year, the eighth call for proposals was launched and received support from the leading healthcare investment funds in the country, reaching a record 201 companies analysed. During this year, it has invested in 6 startups, increasing the total number of investments

made by BStartup10 to over 100. Its investment portfolio has been rated very positively and has already yielded significant returns, consolidating itself as one of the most active seed-stage investors in the country. During the year, BStartup exited its stakes in 6 portfolio companies.

Over the year, BStartup's team organised or actively participated in almost 130 entrepreneurship events in various Spanish cities, boosting Banco Sabadell's renown and position as a leading financial institution for startups and scaleups. As an example of this position, attention is drawn to BStartup's more than 1,000 mentions in different media outlets (offline and online press). The company has reached over 15,710 social media followers across X and LinkedIn (with a new LinkedIn profile launched in June 2025).

Franchising

Banco Sabadell was the first financial institution in Spain to adopt the franchise system. For 29 years, its Franchising division has supported both franchising brands and their franchisers, consolidating itself as a leader and standard-bearer in the sector. This sector, which is becoming increasingly professionalised, has seen constant growth in revenue, job creation and number of brands.

Banco Sabadell currently has more than 11,500 franchising customers, working with more than 1,330 franchised brands, most of which have signed collaboration agreements. The Bank offers a wide range of products and services specifically designed for this sector. These collaboration agreements include preferential conditions in terms of financing, transactionality and security, managed through the branch network with the support of sector-specialised franchise managers.

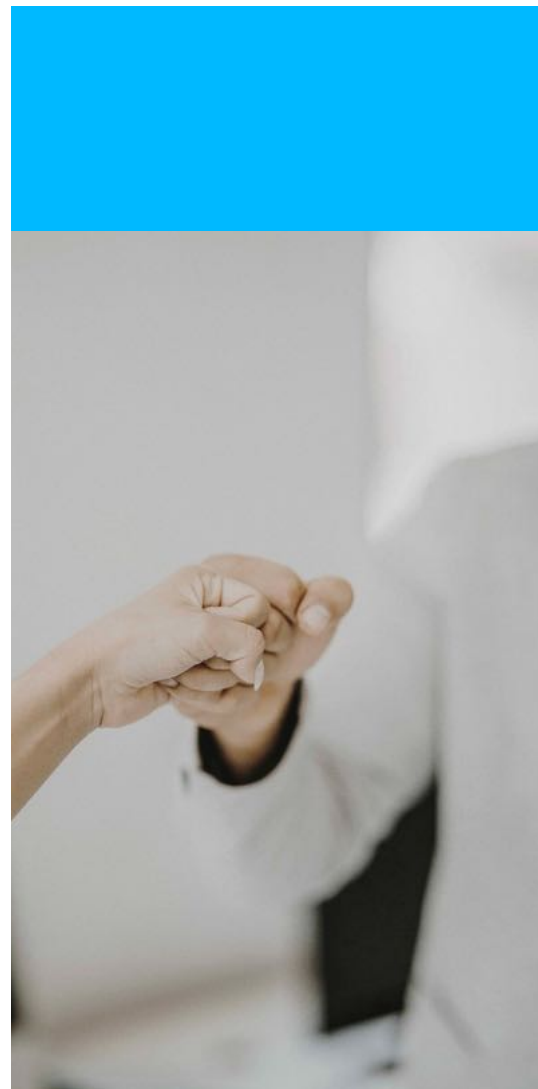
The Franchising division has morphed into a partnership model that is key to business generation and customer satisfaction, in order to achieve synergies, energise the commercial offer and increase business generation. This has entailed a radical change to boost collaborative work with other cross-cutting divisions of the Bank, identifying new business opportunities and creating global value propositions for customers.

Banco Sabadell works closely with the Spanish Franchisors' Association (Asociación Española de la Franquicia, or AEF) and was the first bank to secure a partnership with this association and together they drive this business model.

In 2025, the Sabadell Franchising division took part in several important initiatives organised for the franchising sector:

- Exclusive sponsor of Franquishop, an event held in various locations in Spain.
- Participation in the second edition of the Franchise Innovation Summit.
- Sponsorship of the National Franchise Awards in Spain.
- Sponsorship and participation in the Entrepreneurs Forum.

In addition, Sabadell Franchising has published articles in the press and in specialist magazines, collaborating with different franchising experts, and has carried out numerous activities disseminated through social networks. These initiatives reinforce Banco Sabadell's renown and leadership in the franchising arena.



Agriculture Segment

In 2025, Banco Sabadell's Agriculture segment, which includes the agricultural, livestock, fishing and forestry subsectors, has more than 300 specialised branches and a team of 14 specialists located throughout the country. This team provides comprehensive support to the sector, having expanded its range of sector-specific financial products and services adapted to customer needs and demands.

In this vein, Banco Sabadell was recognised in 2025 by the prestigious specialised publishing house Qcom.es as the most innovative bank for the producing sector. This distinction celebrates the effort, work and dedication of many Banco Sabadell professionals.

Banco Sabadell's strong commitment to the sector, especially its tailored customer support, has led to an increase in turnover of over 8.1% compared to 2024. This achievement is underpinned by customers' trust. It should be mentioned that the customer base increased by over 6% compared to the previous year.

During 2025, Banco Sabadell's Agriculture Segment participated in 3 agrifood fairs and sponsored 44 events throughout the nation.

Banco Sabadell's Agriculture segment seeks to support its customers in their digitalisation and sustainability journeys.

Hotel and Tourism Business

Back in 2013, Banco Sabadell became the first Spanish financial institution to specialise in the tourism business in order to understand, identify and meet the needs of Spain's top sector in terms of contribution to GDP, namely the tourism industry. The Bank has consolidated itself as one of the top banks, a leader in the sector, offering expert advice with the highest standards of quality.

The value proposition is primarily based on offering specialised financial solutions to a group that is heterogeneous and highly fragmented. This value proposition is built on three basic pillars: expert advice, a specialised product range, and a rapid response.

Since 2023, the tourism industry has performed remarkably well, beating previous records for international tourist arrivals year after year. In 2025, Spain welcomed approximately 100 million visitors, consolidating its position as the world's second most popular tourist destination. Average daily spending is also on an upward trajectory, as is the number of overnight stays and occupancy rates, reflecting the strong performance of tourism indicators. Against this backdrop, in 2025 Banco Sabadell's Tourism Business division achieved a figure close to 1.15 billion euros, and it will continue to support both the acquisition of hotels or new hotel projects and the upgrading and repositioning of the existing hotel sector stock.

The Tourism Business division also has the institutional recognition and participation of leading entities in the industry, as a voting member on the board of Spain's Tourism Council (Consejo Español de Turismo, or Conestur), the Tourism Commission of the Spanish Confederation of Business Organisations (Confederación Española de Organizaciones Empresariales, or CEOE) and the Tourism Commission of the Spanish Chamber of Commerce.

As it is every year, Banco Sabadell was present at the main international tourism fair (FITUR) with its own stand. More than 70 Banco Sabadell employees took part in running the stand, which received its highest ever number of visitors. These visitors hailed from companies in the hotel sector, travel agencies, hospitality sector suppliers and consulting companies.

Sustainability has been established as a core pillar for the development and transformation of the tourism industry. The Bank incentivises the sector to attain sustainability objectives by signing



agreements with companies, incorporating a set of commitments based on metrics linked to ASG targets by means of a document annexed to the loan agreement.

Sabadell Professional

The Bank's unit specialised in supporting professional and business associations, along with their members, continues to solidify its position as a national standard-bearer in this field. With a track record spanning three decades, it develops and applies a relationship model built on proximity and specialisation.

Its value proposition focuses on offering specific financial products and services tailored to the needs of both organisations and their member professionals and companies, simplifying day-to-day transactions and contributing to their economic development.

Through regional specialists, the Bank maintains a direct, stable and qualified link to over 3,800 groups across the country, being a bridge of sorts between the Bank and the business fabric. This network makes it easier to spot opportunities, generate business, channel the Bank's cross-cutting solutions, and build and reinforce long-lasting institutional relations, in line with the Institution's global strategy.

During this year, the division undertook a number of initiatives:

- Signed more than 350 agreements with professional associations, general councils and business associations, both at the national and regional levels.
- Participated in over 600 events, forums and conferences, organised together with groups from all sectors.
- Increased the customer base acquired through the management of the various agreements.
- Consolidated the growth in home renovations financing, with an increase in the amount arranged through the branch network compared to the previous year, reinforcing the Bank's commitment to sustainability and the improvement of the Spanish housing stock.

These indicators reflect the division's qualitative and quantitative impact in terms of relationship, positioning and cross-business generation.

As part of its 35th anniversary, Sabadell Professional has strengthened its visibility through its own initiatives and an active presence at key industry events. The Sabadell Professional Forums stand out, held across different regions, featuring leaders of professional associations and influential institutional figures. The "*Profesiones y Futuro*" (Professions and the Future) series of meetings was launched with a sector focus on the major challenges facing the professions. Additionally, it has been present at the main conferences of strategic groups such as economists, pharmacists, social science graduates, the hospitality industry, and the self-employed, among others.

This visibility has been reinforced with content in the specialised press and an active presence on platforms such as LinkedIn, which contribute to positioning the Bank in the professional environment.

Throughout the year, the relationship model has been in constant change to adapt it to professionals' new habits, adding digital channels to acquire new customers, while keeping the division's flagship approachable support intact.

Sabadell Professional carries out its activities in coordination with the other divisions of the Bank, contributing to business generation and the reinvigoration of the business proposition across key segments. Through joint campaigns, it acts as a cross-cutting player capable of generating opportunities beyond its immediate area.

Sabadell Professional will further solidify its role as one of the Bank's strategic units in the professional and business association landscape,

expanding its network of alliances, evolving towards a more efficient hybrid model, and strengthening its collaboration with the branch network.

The goal is to continue positioning the Bank as a leading partner for professionals and their associations across all regions of Spain.

Real Estate Business

The Real Estate division focuses on comprehensively developing the residential real estate development business through a specialised and highly consolidated management model.

In 2025, the number of approved applications increased compared to 2024, surpassing the stock of this product in the previous year.

The Investment Property division not only focuses its efforts on generating new business, but also monitors the success of the financed development projects.

The main strategy is to maintain a market share above that in which the Bank would naturally stand, prioritising the best sales opportunities by pinpointing the most notable projects and most solid customers, minimising risk and maximising profit for Banco Sabadell.

Sabadell Partners

The activity of Sabadell Partners as a customer acquisition lever, through partnership agreements with referral agents, is focused on providing services to the branch network for Commercial Banking, Business Banking and Private Banking, offering value propositions to facilitate access to Banco Sabadell's range of financial solutions, seeking customer satisfaction and referral agent satisfaction, at all times, as well as service excellence.

The sustained growth over time of the Sabadell Partners division means that it played an essential part in the mortgage results generated in 2025, reaching 45.2% of the Bank's total mortgage origination. Sabadell Partners' top branches deserve special mention, due to the significance of their contribution to new transactions, stemming from their expert advisory services and their specialisation in managing relationships with key mortgage partners.

4.1.3.5. Commercial Products

Business services

Business Finance

In short-term lending, there was a slight decrease in new credit facilities during 2025, although the balance recorded growth above that of 2024.

With regard to other working capital financing products, the growth of reverse factoring seen during the previous year continued into 2025, with an increase in market share in a landscape in which the Bank is growing more than the market. On the other hand, there was a decrease in the need to finance receivables through specialised solutions such as factoring. By sector, manufacturing continues to make up the largest portion of the factoring and reverse factoring business – almost double the volume of the following industry.

In terms of medium- and long-term financing, new lending items continued to perform positively compared to the previous year, with significant increases in both loans and mortgages for business purposes, including the public sector.

In relation to financing for purposes aligned with the Bank's Sustainable Financing Framework, during 2025 the Institution had mobilised more than 4.6 billion euros for projects related to renewable energies, energy efficiency, sustainable transportation, and water & waste management in the corporates and SMEs segment.

As part of its commitment to support businesses in their transition towards decarbonisation, Banco Sabadell also offers financing linked to the company's sustainability goals, which encourages the inclusion of sustainability goals in their business strategy. In 2025, more than 3 billion euros in corporate financing of this kind was mobilised.

Banco Sabadell works tirelessly so that its customers can make the most of the opportunities offered by sustainable financing and, in particular, the European funds. Consequently, these options are explained to companies through sessions at the Sabadell Companies Hub, with customers and specialists in attendance.

International

In 2025, the International Business division's activities focused on three key areas.

Firstly, capturing working capital transactions in the international segment, both in terms of the products most typically required by companies, import/export financing and international bill discounting, and in terms of the consolidation of working capital facilities and international guarantees covered by CESCE, which are more complex but offer more added value for businesses. This has allowed us to meet the most stringent needs of customers and to play an active part in the international payments and collections that are linked to the financing.

Secondly, enhancing the customer experience of corporate digital services through the redesign mainly of international transfers made via BSOOnline. This upgrade has enabled us to add new services such as the traceability of international transactions through GPI Tracking, which gives customers real-time visibility of the status of their transfers. In addition, the option for companies to finance international transfers has been automated and made simpler through BSOOnline. This has clearly improved the customer experience.

Thirdly, acknowledging the importance of specialisation and the constant geopolitical changes, the Bank honed in on training. For one thing, with the eighth edition of the Sabadell International Business Program, which continues to be an absolute success every year, providing technical and business training to companies to prepare an internationalisation plan. For another, training for international business managers continues to be important, ensuring high levels of expertise to support companies in their internationalisation processes.

In terms of international business in documentary transactions, the Bank continues to have a very large market share in both export letters of credit and import letters of credit, demonstrating the high level of quality offered by the Institution in more complex transactions.

In terms of markets, it should be noted that the Bank once again is well positioned in preferred markets for Spanish companies, such as Algeria, which after a temporary closure has now reopened for some sectors. The Bank reacted quickly to capture value operations in this market.

Finally, in terms of visibility, reporting and training for companies, the Bank has carried on with the dynamic of the "International Business Wednesdays" sessions held at the Companies Hub, with discussion of matters including logistics, foreign markets and foreign trade products. All told, 13 activities were held with a high level of interest.

Payment Services

In 2025, Banco Sabadell has reinforced its commitment to innovation in payment services, expanding its range of solutions for shops and stores with new smart devices. The range of Smart PoS devices has been enhanced with three different models: Smart PoS, Smart Mini PoS and Smart Dual-Screen PoS terminals. These devices not only process payments, but also integrate advanced features such as split payments, delivery of receipts through digital channels, passport scanning for duty-free purchases and inventory management. In addition, new features have been introduced, including transaction views by time slot, automatic emails with the day's totals, faster return processing and payments via QR codes.

One of the main new features has been the full deployment of the Instant Credit solution in the Smart PoS terminals. This tool, which was developed by Sabadell Consumer Finance, enables merchants to offer finance to any customer, regardless of whether they are a customer of the Bank or not. The entire application process is completely digital. This solution had a strong reception in sectors such as healthcare, training, home, opticians, orthopaedic shops and driving schools.

During 2025, Banco Sabadell's strategy has focused on improving profits and ensuring the long-term sustainability of the business. This focus on economic efficiency has aligned costs with actual service use and strengthened the overall profitability of the payment services business, in an environment of sustained and moderate growth of the transaction volume.

The volume managed has increased slightly compared to the previous year, driven by the new range of devices and momentum in domestic consumption.

Corporate Credit Cards

The corporate credit cards business performed well, with year-on-year increases in turnover and profit margins.

During 2025, in line with the commitment *vis-à-vis* customers to offer solutions that are more tailored to their needs, improvements were made in risk granting for credit cards, and digital functionalities were implemented for arranging and changing delivery addresses for company credit cards. In this regard:

- The approval of credit cards for self-employed persons has been enhanced by anticipating the calculation of the credit limit for new customers. This led to an increase in the potential customer base and furnished relationship managers with a customer engagement and servicing tool.
- Several new functionalities have been developed, most notably the fully online business credit card application service for the self-employed.

Company Insurance

In 2025, Banco Sabadell has strengthened its leadership position in the protection against insurable risks for companies, small businesses and self-employed persons, offering a comprehensive, competitive and high-quality value proposition.

Noteworthy aspects during the year include:

- Collective health cover: new dental insurance aimed at employees and executives of business customers, in the form of both fringe benefits and flexible benefits.
- Sector specialisation: development of solutions adapted to the specific needs of each business or industry.

- Specialised team: building and strengthening of the team of managers specialised in company insurance throughout the nation, providing support to the branches within their area in the commercial management with value offers and processing of customer policies.
- Asset protection: core products (multi-risk, civil liability and specialised solutions) remain the cornerstone for safeguarding assets and managing third-party liabilities.

With these initiatives, Banco Sabadell takes another step toward its objective of offering insurance solutions that provide value, certainty and confidence for the benefit of its customers.

Retirement Planning

Through the Retirement Planning unit, Banco Sabadell Group offers solutions and responses to customers to help them better implement and manage their retirement plans.

In 2025, the demand for these plans among small and medium-sized enterprises, in particular collective retirement insurance and joint pension plans, continued to grow. Life cycle-based investment policies, designed to complement its profiled investment funds, represent an innovative and distinctive solution in the market that deserves special mention.

In addition, pension plans exclusively aimed at self-employed workers are marketed through agreements with professional associations, taking advantage of the higher contribution limits for these groups.

It is also worth calling attention to the *Sabadell Flex Empresa* product, which consists of a fully digital platform for flexible benefit plans that allows companies to optimise their remuneration model and employees to increase their net disposable income through tax planning.

Leasing and Rental of Capital Goods

In terms of leases, during 2025 there was a slight increase in investment demand for both movable and immovable property. This growth contrasts with the sharp decline in transactions of big-ticket items, which tend to show high year-on-year variability.

There was a slight decline in the Bank's market share, partly due to customers shifting towards other financial products. To boost product reach, initiatives are being developed to strengthen the foothold in growing sectors and revamp the product offering, so as to improve agility and adaptability.

As regards rentals of capital goods, the market experienced remarkable growth, primarily driven by the momentum in the automotive sector, although industrial equipment also performed well.

From the Bank's standpoint, there was a healthy increase in market share, driven both by increased demand for business finance and by customers moving away from traditional products to more innovative financing solutions that offer additional advantages.

It is worth noting that sustainable financing, across both leasing and rental segments, continues to gain momentum and accounts for a growing share of total lending arranged.

Vehicle Leasing

The vehicle leasing market is still in its growth phase, with companies and individuals driving sustained demand. This momentum is creating new opportunities in the sector, especially in segments that value flexibility and operational efficiency.

The Bank is successfully capturing part of this market buoyancy thanks to the work done in product development, which is already being reflected in an increase in new leases.

This has been possible thanks to a process of continuous improvement focused on service quality, with the aim of always offering a competitive value proposition, tailored to each segment, under good terms and conditions and with the flexibility that customers need.

Official Agreements and Guarantees

The Official Agreements and Guarantees division continues to manage agreements with various public bodies with which the Bank maintains a relationship. The Bank has signed new partnership agreements that enable it to meet the financing needs of its customers.

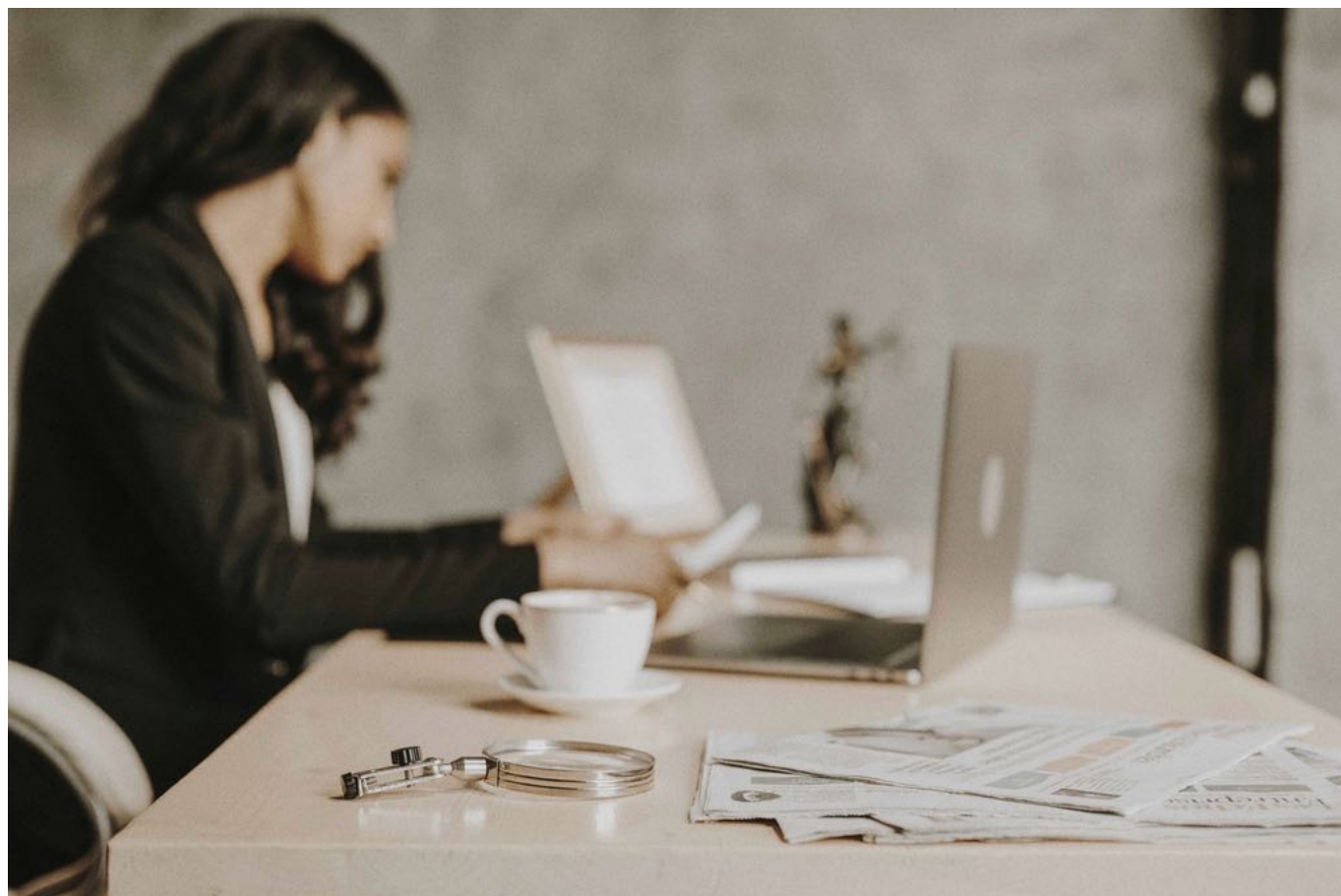
In May 2025, the Bank joined the ICO Tariffs line, an initiative aimed at providing finance under advantageous terms to cover costs stemming from the tariff measures. This product offers customers a significant financial improvement by reducing the cost of funding associated with their import operations, thus strengthening their international competitiveness and their operational liquidity.

The Bank's agreements with Mutual Guarantee Societies (MGSs) were also revised. As part of this review, agreements with CREA SGR, Avalis de Catalunya, Avalmadrid, Aval Castilla-La Mancha, Afin and Elkargi, among others, were renewed.

In 2025, a large number of applications for the various EIB facilities made available to customers was submitted.

In September 2025, two new special agreements were signed with the EIB to allocate 500 million euros of new finance to SMEs and 270 million euros to ecological projects in Spain.

One of the main goals for 2025 was to boost finance through the ICO MRR lines, which offer customers products with the best terms and conditions to fund their projects.



4.1.4. Corporate & Investment Banking

4.1.4.1. Business overview

Corporate & Investment Banking is the business unit that offers financial solutions and advisory services to large corporates and financial institutions, both in Spain and internationally, with a presence in 11 countries.

It is one of the Bank's three core units, alongside Retail Banking and Business Banking. It is a division structured around the different needs of customers and the capabilities of each of these three distinct banking business lines to best meet those needs.

It structures its activity around two pillars, the first of which is the customer. It aims to serve its customers to meet the full range of their financial needs. This pillar is determined by the nature of those customers and includes large corporations classed under the Corporate Banking umbrella, financial institutions, Private Banking clients in the United States. The second pillar is specialised businesses, which group together the venture capital business run through BSCapital, and the activities of Structured Finance, Treasury, Investment Banking, and Trading, Custody and Research. Its goal is to advise, design and execute custom operations that anticipate the specific financial needs of its customers, be they companies or individuals, with its scope of activity ranging from large corporations to smaller companies and customers, insofar as its solutions are the best way to meet their increasingly complex financial needs.



4.1.4.2. Management milestones in 2025 and priorities for 2026

Corporate & Investment Banking remains focused on prioritising the creation of value for its customers, thus contributing to their growth and future earnings. To do this, it has continued to innovate and promote its specialist capabilities, fundamentally in the areas of Investment Banking and Structured Finance, which are able to continue meeting 100% of their customers' financial needs. In the same way, the international coverage of the teams is constantly being improved and expanded, always serving the markets in which their customers invest or where they have business interests.

The key areas through which to create value for customers are the following:

- Knowledge: the Corporate Banking teams, located in the different countries in which the Bank operates, have not only specialisation in the large corporations segment but also knowledge and penetration differentiated by activity sectors in order to better understand and serve customers according to their own and their sector's singular characteristics.
- Coordination: unique and specialised solutions are required to meet the needs of large corporations, and these can be provided as a result of the participation and collaboration of several areas within the Bank (specialist teams and even teams operating in different geographies). Coordination between all these teams is crucial for providing and bringing value to customers.
- Specialisation: there are units that develop custom products for large corporations and financial institutions (corporate finance, project finance, project bonds, syndication, commercial paper programmes, debt issuance, M&A, asset finance, derivatives, risk hedging, etc.). The units responsible for developing this entire range of products do so for the entire Banco Sabadell Group, extending their capabilities to the Corporate and Institutional Banking segment.
- Innovation: transitioning from idea to action is vital to grow in such a dynamic and demanding market as that of specialised lending and large corporations. The necessary spaces and mechanisms are created to allow teams to dedicate part of their time to innovation, understood in its broadest sense: innovation in products, in operations and also in the way of collaborating and interacting with others.
- Sustainability: customers are offered support and advice to move towards a more sustainable economy, generating solutions through specialised products and services.

As regards the measurement of the key figures regarding the performance of Corporate & Investment Banking, the focus is placed on monitoring the income statement (monitoring net profit in general and the main revenue items in particular), return on capital (ROTE and RAROC metrics), strict risk tracking and monitoring, as well as proactive action when faced with early signs of potential impairment.

Lastly, the priorities for 2026 are set out in detail in the following sections of this report.

4.1.4.3. Customer pillar

Corporate Banking Europe

Corporate Banking Europe is the customer unit, within Corporate & Investment Banking, responsible for managing the business segment that caters to large corporations which, given their size, uniqueness and complexity, require a tailored service, complementing the range of the more traditional financial products and transaction banking products with services provided by specialised units, thereby offering an end-to-end solution to their needs. The business model is based on a close and strategic relationship with customers, providing them with end-to-end solutions adapted to their needs and requirements, taking into account the specific aspects of their economic activity sector and the markets in which they operate.

This unit covers various branches, notably including the London, Paris, Casablanca and Lisbon foreign branches, which support and cater for the international activity of domestic customers and where the international Corporate Banking business is carried out.

2025 was a year marked by active support to customers focused on finding the best solutions, adapting them to their needs, in an environment of lower interest rates.

As a result of this active support, volumes of lending in Corporate Banking Spain have increased by 10.36% compared to the previous year. Similarly, at the international level, at year-end lending had increased by 10.29% in comparison with the previous year.

2026 presents a series of opportunities in an environment of low interest rates, in which the Spanish economy is well positioned in a complex and uncertain global context. Corporate Banking is responding to this backdrop by supporting its customers with a range of products that covers 100% of their financing needs, in both the short and long term, to cope with the current macroeconomic situation.

The contribution of value to customers in the large corporations segment and the improved profitability for shareholders are the two fundamental management pillars of this unit, which next year will continue to focus on optimising capital consumption, with the aim of increasing the return on capital employed.

Corporate Banking and Private Banking USA

2025 marked Banco Sabadell's thirty-second year operating in the United States through its branch in Miami and through Sabadell Securities USA, which was set up in 2008 and has been operational ever since. These units manage the financial business activities of Corporate Banking and international Private Banking in the United States and Latin America.

The Banco Sabadell Miami Branch is the largest international branch in Florida. It is one of the few financial institutions in the area with the experience and capability to provide all types of banking and financial services, from the most complex and specialised services for large corporations to international Private Banking products, including the products and services required by professionals and businesses of all sizes.

As a way of complementing its structure in Miami, through this branch the Bank manages representative offices in New York and in the Dominican Republic.

Sabadell Securities USA, for its part, is a stockbroker and investment advisor in the securities market that complements and strengthens the business strategy aimed at Private Banking clients residing in the United States, meeting their needs by providing advice on investments in capital markets.

President Trump's second term in office began in early 2025, and the measures taken in many areas added more uncertainty to the American macroeconomic environment. The Federal Reserve remained focused on inflation and employment. An improvement in inflation and a weakening job market made it possible to cut the official interest rate in the last quarter of the year.

Despite assets already starting to reflect the interest rate cuts at the end of 2024, the branch was able to manage and improve its net interest margin throughout the year through strict discipline in deposit price control and by actively managing the banking book. Following on from previous years, the high level of interest paid in the banking market and the competitive rates of US treasury bills triggered a migration of balances from non-interest-bearing deposits to money market accounts, term deposits and to investments in securities that offered higher yields. This process led to a high cost of deposits, which was insufficient to fully offset the fall in interest rates.

In the international Private Banking business, strong performance in the main US stock market indices, robust sales of structured products, proactive advisory services and effective transaction fee management more than offset the downward trend in average fees, driven by the change in composition of customers' investment portfolios, which focused more on funds with greater exposure to US Treasury bonds and money market instruments.

With regard to the key financial figures of the business in the USA, in an environment of uncertainty over the projected performance of the US economy, turnover increased at rates above 10% in US dollars.

The Private Banking business was a mixed bag, with deposits remaining stable and portfolios of investments in securities recording double-digit growth.

The Corporate Banking business continued to be impacted by the rise in loan prepayments, despite the fact that the average official interest rate for the year was slightly lower than in the previous year. Notwithstanding, this business unit has increased lending to double digits, growing in the target segments with adequate profit levels, which has also contributed to generating fees and commissions comparable to the previous year.

In any event, net interest income in the year grew compared to the previous year, on the back of the increase in turnover and good liabilities management. Net fees and commissions also increased compared with the previous year, driven by the business's solid performance. All of this benefited the gross income which, combined with a contained reduction of administrative, depreciation and amortisation expenses, had a positive impact on net profit, which grew around 7% in US dollars compared to the previous year.

The process of operational improvements continued during 2025, with completion of the stages of the project to update the IT platform in order to improve the features available to customers and to the business and support units.

4.1.4.4. Specialised businesses

Structured Finance

The Structured Finance division encompasses the Structured Finance and Global Financial Institutions units. This division operates globally and has teams in Spain, the United States, the United Kingdom, Mexico and France.

Structured Finance's activity focuses on the study, design and origination of corporate finance products and transactions, leveraged buyouts (LBOs), project & asset finance, global trade finance and commercial real estate, with the capacity to underwrite and syndicate transactions at the national and international levels, as well as being active in the primary and secondary syndicated loan markets.

The Global Financial Institutions unit manages the commercial and operational relationship with the international banks with which Banco Sabadell has collaboration and correspondent agreements (some 3,000 correspondent banks around the world), thus guaranteeing maximum coverage for Banco Sabadell Group customers in their international transactions. This allows it to ensure that it provides customers with optimal support in their internationalisation processes, in coordination with the Group's international network of branches, subsidiaries and investees.

In 2025, thanks to its policy of supporting customers and adapting to their needs so as to seek the best way to meet their credit requirements within the possibilities offered by the credit markets in the specific macroeconomic environment, Banco Sabadell has improved its leadership position in Spain, as well as in Mexico and the United States. In 2025, a new structure was created to concentrate the business in EMEA, particularly in operations in the United Kingdom, France and Portugal, with the aim of increasing activity in these geographies and taking a more active role in European one-off transactions.

The Bank's top priority continues to be supporting customers by designing long-term financing structures for new projects, acquisitions and internationalisation, among other things, as well as syndicated transactions that ensure stable and complete debt that can be restructured, where appropriate, assessing the positive potential of possible solutions combined with Investment Banking, Treasury or BSCapital products, to which end the development of a better commercial system, carried out jointly with Business Banking and Corporate Banking, is essential.

BSCapital

BSCapital carries out the Group's venture capital and private equity activities. Its activity involves acquiring temporary stakes in companies and venture capital funds, with the aim of maximising the return on its investments. In addition, it offers support to companies through alternative financing (senior debt fund, venture debt and mezzanine loans).

BSCapital actively managed its portfolio, engaging in its traditional capital and debt-related activities, with the materialisation of investment and disinvestment operations and portfolio revaluations.

It has continued to follow a strategic approach to its investments in private equity funds, the divestment of some of the most significant Aurica III fund investees being particularly noteworthy. The Aurica IV fund, of which Banco Sabadell is anchor investor, continues to make new investments.

In the area of venture capital, the launch of Necta, a venture capital fund of funds, stands out, with Banco Sabadell as co-manager and anchor investor. The project was developed in close collaboration with



Private Banking, enabling the delivery of a distinctive product that has been very well received by clients.

BSCapital continues to carry out transactions guaranteed under the InvestEU programme for renewable loans, venture debt and mezzanine facilities granted by the European Investment Fund (EIF).

In renewables, it continues to seek investment opportunities suited to the current action framework, focusing on Spain and Latin America, and it is analysing potential asset sales. It is also working on the definition of a new action framework for the next five years.

The debt fund Crisae continues to originate and execute transactions to offer funding to companies in the Spanish midmarket. Crisae is owned by Banco Sabadell Group and institutional investors.

Throughout 2026, BSCapital will continue to invest in capital and debt, with the support of international bodies such as the EIF, and it will continue to focus on optimising capital consumption. It will also keep managing the current portfolio to generate long-term value.

Funding opportunities will continue to be sought, in accordance with the frameworks of investment in mezzanine debt and renewable energies, with the expansion of the latter.

Focus will be placed on venture debt activity and the rotation of the venture capital portfolio through divestments that produce capital gains.

Crisae will continue to originate and execute transactions aimed at increasing the size of the debt fund, in addition to managing the current portfolio.

Treasury & Markets

Treasury & Markets is responsible, on one hand, for structuring and selling treasury products to the Group's customers, through the Group's units assigned for this purpose, both from commercial networks and through specialists and, on the other hand, for managing the Bank's short-term liquidity, as well as managing its regulatory ratios and ensuring they are compliant. It also manages the risk associated with the trading of interest-rate, forex and fixed-income products, which mainly arises due to flows of transactions originated by the activities of the structuring and distribution units with both internal and external customers, and by activities related to short-term liquidity management.

In 2025, the Treasury & Markets division continued to work on the digitalisation and optimisation of its transactions with customers, seeking to expand its range of services and improving customer experience. Furthermore, the division continued to expand the range of products and solutions it has on offer, adapting it to new customer needs arising from a changing market. The focus was also placed on optimising costs and capital consumption associated with the unit's activities.

Looking ahead to 2026, the goal for the distribution business is to provide customers with a sufficiently broad range of product solutions to enable them to manage their risks as efficiently as possible. With regard to commercial segments, the focus will be placed on increasing capacity in order to provide services to large enterprises and corporates. In trading activity, the aim is to continue to build up the capacity to manage risk in the Bank's own books, reducing hedging transactions with other institutions, and to continue to improve collateral management in order to obtain the highest possible returns.

Investment Banking

Investment Banking forms part of the Corporate & Investment Banking division, which offers the Bank's customers value-added products and services that do not involve the Bank's balance sheet. The activity of this division can be broken down into three different teams:

The Corporate Finance division, which combines the following activities: (i) Mergers & Acquisitions (M&As), (ii) Equity Capital Markets (ECM), and (iii) Alternative Financing.

The M&A activity consists of offering advice on company acquisitions and sales, corporate mergers and the incorporation of new shareholders. In an environment in which buyers and sellers have delayed or ruled out transactions in light of economic and geopolitical uncertainties, the Bank has successfully advised on significant transactions in the Spanish education sector.

The activities of the Equity Capital Markets division include, among others, activities related to corporate capital transactions and IPOs. In 2025, the number of transactions in the Spanish market continued to follow a downward trend, exacerbated by the unfavourable stock market performance of securities placed over the previous year, which dampened investor appetite. The Sabadell team, however, was able to participate in the successful capital increase of a technology company and issued the first convertible bond for a customer in France.

Lastly, the Alternative Financing division coordinates the channelling of liquidity of institutional investors wishing to take on risk in situations where banking institutions typically do not. Investment Banking continues to focus on offering tailor-made financing solutions, in any format, in various sectors, from real estate to infrastructure, focusing particularly on renewable energy projects and corporate finance in the domestic mid-corporates segment.

All the above activities were merged into one single division, Corporate Finance, to offer Banco Sabadell customers all of the value-added solutions available according to their corporate needs, in terms of both capital and debt.

The second division, Debt Capital Markets (DCM), encompasses activities involving the origination and structuring of public instruments in trading markets. In terms of the Bank's participation in transactions involving corporates, those involving public sector and financial issuers, in both long- and short-term financing operations, with a particular focus on sustainability-labelled issues, are considered particularly noteworthy. One of the markets in which the Bank is most active is that of commercial paper programmes, participating in the programmes of 50 different issuers.

In 2025, this market was shaped by an environment in which financial institutions sought to offset interest rate cuts with more lending, which resulted in fierce competition for customers' issuances in public capital markets. Despite this, the Debt Capital Markets unit had record activity, as it participated in the largest number of customer issuances in recent years.

Also worthy of note is the Bank's participation in issuances of the autonomous communities, which once again involved significant volumes, and lastly, its participation in 67 issuances by financial institutions. Furthermore, noteworthy activity in Spain's alternative fixed-income market (MARF) included an upturn after the summer, during which the Institution led bond and commercial paper programmes.

Lastly, the third division, Syndicate & Sales, encompasses the distribution of private debt originated by the Structured Finance teams among banking and institutional investors, both domestic and international.

The division faced a year of stiff competition in this area of activity, as the appetite for funding bilateral transactions with corporates increased; in view of this, the division pivoted towards increasing its share of secondary market purchasing activity, thereby also increasing the credit exposure of the Bank's balance sheet. Notwithstanding the foregoing, the Bank underwrote transactions for 2 billion euros. It also completed its first underwriting of a renewable energy project finance transaction in the United States and achieved a record number of loan underwritings in Mexico, primarily in the hotel sector.

On a separate note, it has continued to seek alternative third-party financing for certain corporate customers' investment projects, increasing the number of providers approached for this type of financing and reaching new agreements with funds to expand the range of situations in which this type of loan might be obtained (renewables, machinery, real estate, among others).

Overall, Investment Banking continues to develop and expand its capacity to offer a broader range of value-added solutions, helping the Bank to position itself as the leading financial institution for companies seeking funding in all situations.

Trading, Custody & Research

Trading, Custody & Research is the unit responsible for the Group's equity, as product manager. Its main services notably include the execution of transactions in organised markets, in both domestic markets, in which it acts as member, and international markets, in which it is an intermediary.

It has a research department whose aim is to offer guidance and recommendations for investors to make informed decisions. Customers can access this service through a variety of means, including podcasts, webinars, videos, daily reports, sectoral reports, company factsheets, etc.

In 2025, a number of initiatives and projects were implemented focused on improving the experience offered to customers, supplementing the range of brokerage products, and attracting new customers.

Commercial activity with Private Banking clients who frequently trade in securities has continued, in order to boost the exclusive direct access service through the trading desk, for both execution services and recommendations.

In 2025, Banco Sabadell maintained a brokerage share on the Spanish Stock Exchange (BME) similar to 2024, standing at 8.5% compared to 8.3% the previous year.

A very high percentage of transactions carried out through self-service channels was observed, with over 90% of orders channelled directly by customers using tools provided by Banco Sabadell, the mobile app being the preferred channel for these transactions.

The main objective for 2026 will be to maintain and increase brokerage volumes in equity markets, taking full advantage of the new Sabadell Broker platform that will provide greater research information, as well as better and more sophisticated brokering capabilities and services.

In terms of income, 2025 built on the positive trend of the previous year, with fees and commissions recording double-digit growth. The outlook for 2026 is optimistic, although the potential for volatile market conditions cannot be ruled out, which could impact volumes and income.



4.2 Banking Business United Kingdom

4.2.1. Business overview

TSB (TSB Banking Group plc) offers a range of retail banking products and services to its customers in the United Kingdom. The entity has a multi-channel distribution model, including fully digital capabilities (internet, mobile and video) and telephony channels, in addition to a network of branches throughout Great Britain.

This multi-channel offer creates an opportunity for TSB to serve customers better. Customers want a bank that gives them access to both skilled people and simple digital tools to meet their banking needs and this, in turn, improves confidence in managing their money. TSB continues to invest in digital products and services that meet current and future customer needs. To that end, the entity combines the best that digital banking has to offer with a high-street presence. This enables TSB to serve its customers in a personal way when it matters most.

As described above, in relation to this investee, following receipt of a binding offer from Banco Santander to acquire TSB, the Board of Directors of Banco Sabadell, at its meeting of 1 July 2025, agreed to submit the offer for approval at an Extraordinary General Meeting, at which, on 6 August 2025, shareholders approved the sale of all shares representing the share capital of TSB to Banco Santander. The closing of the transaction, which is expected to take place during the second quarter of 2026, is subject to obtaining regulatory authorisations from the competent authorities.

4.2.2. Management priorities in 2025

During 2025, TSB became a more competitive, confident and collaborative bank, guided by its purpose – Money Confidence. For everyone. Every day.

The entity has become more attuned to its customers' needs, offering improved products and services that give more people a reason to bank with TSB, and rewarding their loyalty when they do so. As a result of these strong actions, TSB has established a continued trend of record financial performance, reflecting continued cost management discipline and improved income while remaining focused on delivering for customers.

4.2.2.1. Executing the strategy

TSB's record performance was achieved through a relentless focus on delivering "Money Confidence. For everyone. Every day".

During the year, TSB has invested in improving its capability, upgrading its technology infrastructure, further improving its agile capability within teams, enhancing its approach to risk management, and progressing actions as a responsible business supporting customers, colleagues and communities.

In 2025, TSB:

- Reported a 9.5% increase in mortgage completions and won What Mortgage Award's Best Direct Lender for the fifth year running, and Best Fixed-Rate Lender for the sixth year running.

- Improved the credit card application journey by introducing a new eligibility checker for customers, with lending increasing by 6%.
- Provided more rewards for customers than ever before, with over 4.4 million pounds sterling paid in cashback.
- Made over 1,300 improvements across its digital channels, including making it easier for customers to organise their accounts, manage transactions, and apply for new products.
- Enhanced its fraud detection capability – preventing an additional 37% of fraudulent payments from taking place.
- Helped more than 5,000 people through its Money Confident Communities Programme – with 23% of employees volunteering their skills.
- Became an even more diverse business – including 43% of senior roles being held by women (against a 2025 target of 40%).
- Supported more than 400 customers and employees to escape from an abusive situation through its industry-leading Emergency Flee Fund and its partnership with the Hollie Guard personal safety app.

In an extraordinary year for TSB, it has continued to step up and deliver on its purpose, remaining highly relevant and attractive to customers, and its strength is underpinned by its robust capital and liquidity position.

4.2.3. Key figures

TSB's contribution to net profit came to 318 million euros as at 2025 year-end, representing strong year-on-year growth on the back of improved net interest income, lower costs, and a positive impact of 35 million euros related to a netting arrangement negotiated with Lloyds Banking Group plc.

Net interest income came to a total of 1,232 million euros, growing by 5.9% year-on-year, as a result of a higher credit yield and underpinned by the contribution of the structural balance sheet hedge.

Net fees and commissions amounted to 90 million euros as at the end of 2025, representing a year-on-year reduction of 16.0% due to a decline in card fees.

Other operating income and expenses improved by 47.3% year-on-year due to the recognition of the aforementioned 35 million euros.

Total costs amounted to 849 million euros, falling by 4.3% compared to the previous year due to an improvement across all items, particularly general expenses. Recurrent costs also decreased, by 2.0%.

Provisions and impairments came to 55 million euros, thereby increasing by 18 million euros year-on-year, as 2024 included a positive impact as a result of updated macroeconomic scenarios.

Million euro

	2025	2024	Year-on-year change (%)
Net interest income	1,232	1,163	5.9
Net fees and commissions	90	107	(16.0)
Core revenue	1,322	1,270	4.1
Profit or loss on financial operations and exchange differences	24	39	(37.7)
Equity-accounted income and dividends	—	—	—
Other operating income and expenses	(12)	(23)	(47.3)
Gross income	1,334	1,286	3.7
Operating, depreciation and amortisation expenses	(849)	(887)	(4.3)
Pre-provisions income	485	399	21.6
Provisions and impairments	(55)	(37)	46.9
Capital gains on asset sales and other revenue	1	(8)	—
Profit or loss before tax	431	353	22.0
Corporation tax	(112)	(100)	11.7
Profit or loss attributed to minority interests	1	—	—
Profit attributed to the Group	318	253	25.7
ROTE (net return on tangible equity)	15.3 %	12.0 %	
Cost-to-income (administrative expenses / gross income)	63.7 %	59.5 %	
NPL ratio	1.5 %	1.5 %	
Stage 3 coverage ratio, with total provisions	32.1 %	34.3 %	

(*) The exchange rates applied to the income statement are EUR/GBP 0.8566 (average) and EUR/GBP 0.8463 (average) in 2025 and 2024, respectively.

Gross performing loans were down by 5.3% year-on-year, impacted by the depreciation of the pound sterling. At constant exchange rates, this reduction was 0.3%.

On-balance sheet customer funds fell by 4.5% compared to 2024, while at constant exchange rates they increased by 0.5%, with the growth in term deposits being particularly noteworthy.

Million euro

	2025	2024	Year-on-year change (%)
Assets	51,884	55,604	(6.7)
Gross performing loans to customers	41,093	43,380	(5.3)
Liabilities and equity	51,884	55,604	(6.7)
On-balance sheet customer funds	40,229	42,123	(4.5)
Wholesale funding in capital markets	5,884	5,859	0.4
Allocated own funds	2,488	2,543	(2.2)
Off-balance sheet customer funds	—	—	—
Other indicators			
Employees	4,619	4,729	(2.3)
Branches and offices	175	186	(5.9)

(*) The EUR/GBP exchange rate applied to the balance sheet is 0.8726 as at 31 December 2025 and 0.8292 as at 31 December 2024.



4.3 Banking Business Mexico

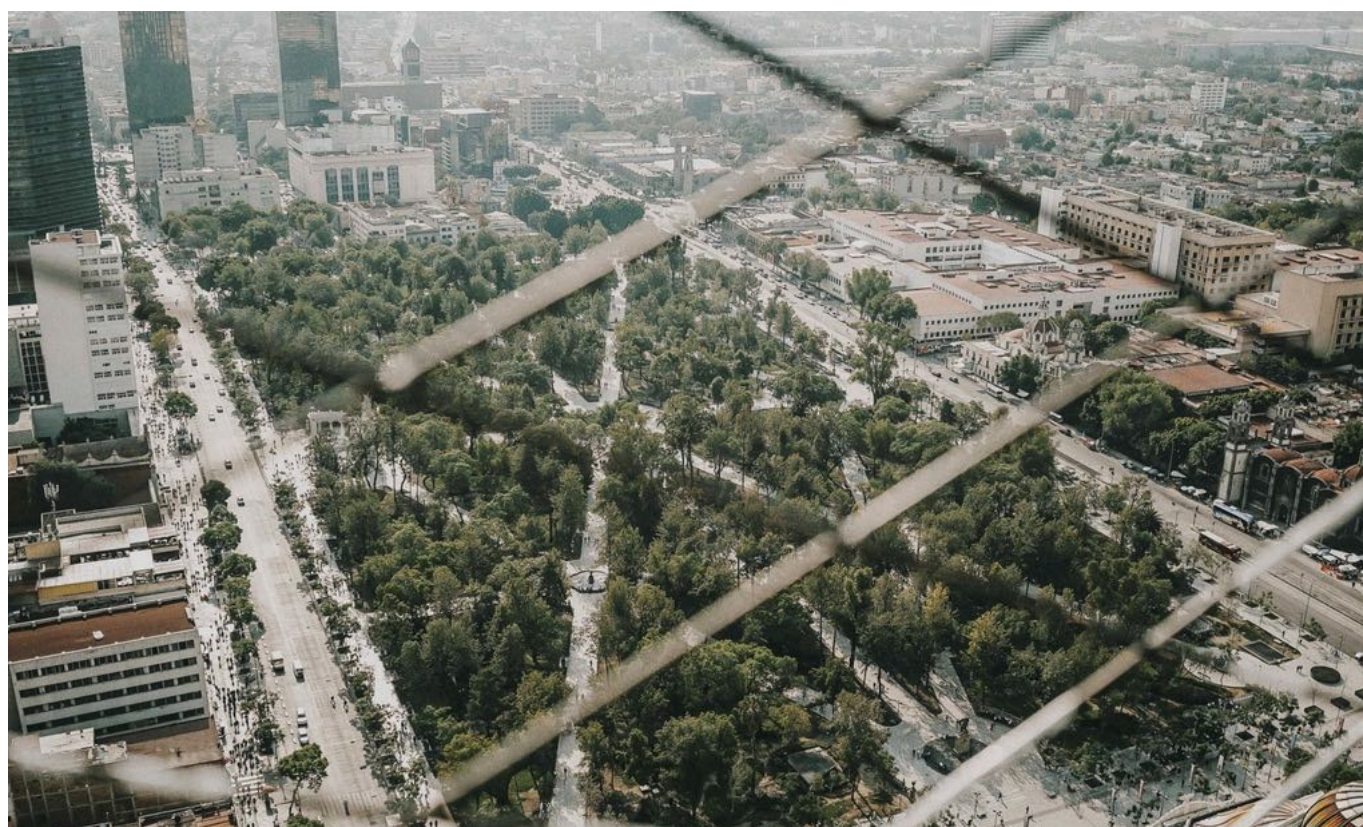
4.3.1. Business overview

The business was established in Mexico through an organic project with the creation of two financial vehicles: first, a SOFOM (multi-purpose financial company), which commenced operations in 2014, and subsequently a bank. The banking licence was obtained in 2015 and the Bank began operating in Mexico at the beginning of 2016.

On 1 January 2025, through a unanimous resolution of the shareholders, the merger of the two entities was approved, with the SOFOM being dissolved by merger with effect from 1 January 2025. This transaction was approved by the National Banking and Securities Commission (CNBV), the regulator in Mexico, on 17 December 2024. The main objective of the merger was to streamline administrative and corporate governance processes, optimise technology investment, reduce operational risk, minimise duplication, and strengthen capital and liquidity indicators.

Banco Sabadell operates under a customer-centric model, with agile processes, digital channels and with no branches. Business capabilities have been rolled out across ten entities in Mexico. The business in this country encompasses the following business lines:

- Corporate Banking, aimed at corporates and large enterprises, with specialisation in different sectors.
- Business Banking, which mimics the Group's original business banking relationship model.
- Retail Banking, with an entirely digital product for customer acquisition, which pays interest with no minimum balance, has zero fees, and offers 24/7 availability of funds.



4.3.2. Management priorities in 2025

The Mexican subsidiary delivered positive performance over the year, driven primarily by close monitoring of the impaired portfolio, which had a favourable impact on the estimation of provisions for loan losses. It also achieved savings in administrative expenses.

During 2025, the Mexican subsidiary continued to focus on growth, financial self-sufficiency and profitability. It is worth noting the following initiatives implemented during the year:

- In Corporate Banking, the Fiduciary division was strengthened, and activity in derivative financial instruments was also expanded by introducing new products, such as options or currency forward transactions, leading to a more comprehensive service offering for structured finance transactions and reinforcing customer relationships.
- In Business Banking, the improvement in transactional capabilities was consolidated, maintaining a high-quality service, which has set it apart since the segment was first launched.
- During 2025, the Bank continued to work on the Retail Banking project to attract new customers, offering attractive interest rates and the ability to access funds at any time.

In 2025, in order to enhance value creation, the entity undertook financial planning aligned with the Group to better define Banco Sabadell's strategic courses of action in Mexico. The main pillars were to (a) increase income generation without consuming capital by boosting fee and commission income with greater loan book placement while promoting products such as derivatives, currency trading and fiduciary services, and (b) develop new treasury strategies to obtain a better return on investments and repo transactions.

On 17 June 2025, HR Ratings ratified the credit rating of Banco Sabadell Mexico of HR AAA long term and HR+1 short term with a stable outlook, based on the operational and financial support that it receives from the parent company in Spain, its sound solvency position, and the improved cost-to-income ratio due to lower administrative expenses. It also underscores the entity's performance on environmental, social and corporate governance factors.

On 1 September 2025, Standard & Poor's upgraded the long-term rating to mxAA+ with the short-term rating remaining at mxA-1+, both with a stable outlook. The credit rating is based on the entity's strategy of focusing on profitability, which is expected to lead to a growing trend in operating income and stable capitalisation levels derived from the gradual improvement in profitability indicators and a conservative dividend policy.

4.3.3. Key figures

The contribution to the Group's net profit as at 2025 year-end amounted to 64 million euros, representing a year-on-year increase of 13% (22.9% at a constant exchange rate), due to reduced costs and lower provisions.

Net interest income stood at 193 million euros, falling by 6% year-on-year, affected by the depreciation of the Mexican peso. At constant exchange rates, this item increased by 2.9%, mainly driven by the lower cost of liabilities.

Net fees and commissions amounted to 27 million euros as at the end of 2025, showing strong growth due to increased business activity.

Total costs stood at 97 million euros, representing a year-on-year decrease of 15.2% at a constant exchange rate, mainly driven by lower general expenses, particularly advertising costs.

Provisions and impairments amounted to -18 million euros as at the end of 2025, reflecting a decline over the year driven by lower provisions for single-name borrowers.

Million euro

	2025	2024	Year-on-year change (%)
Net interest income	193	206	(6.1)
Net fees and commissions	27	18	46.2
Core revenue	220	224	(1.8)
Profit or loss on financial operations and exchange differences	2	13	(80.9)
Equity-accounted income and dividends	—	—	—
Other operating income and expenses	(27)	(21)	27.9
Gross income	195	216	(9.4)
Operating, depreciation and amortisation expenses	(97)	(126)	(22.6)
Pre-provisions income	98	90	9.1
Provisions and impairments	(18)	(24)	(23.1)
Capital gains on asset sales and other revenue	(4)	(4)	(2.0)
Profit or loss before tax	76	62	22.0
Corporation tax	(12)	(6)	110.4
Profit or loss attributed to minority interests	—	—	—
Profit attributed to the Group	64	57	12.8
ROTE (net return on tangible equity)	10.0 %	9.7 %	
Cost-to-income (administrative expenses / gross income)	49.8 %	51.2 %	
NPL ratio	2.7 %	2.8 %	
Stage 3 coverage ratio, with total provisions	59.8 %	59.5 %	

(*) The exchange rates applied to the income statement are EUR/MXN 21.6668 (average) and EUR/MXN 19.7732 (average) in 2025 and 2024, respectively.

Gross performing loans rose by 16.6% year-on-year, impacted by the depreciation of the US dollar, the increase at constant exchange rates standing at 23.5%.

On-balance sheet customer funds rose by 7.5% year-on-year, mainly due to an increase in demand deposits.

Million euro

	2025	2024	Year-on-year change (%)
Assets	7,208	6,646	8.4
Gross performing loans to customers	4,946	4,242	16.6
Liabilities and equity	7,208	6,646	8.5
On-balance sheet customer funds	3,439	3,199	7.5
Allocated own funds	768	686	12.0
Off-balance sheet customer funds	—	—	—
Other indicators			
Employees	500	515	(2.9)
Branches and offices	12	12	—

(*) The EUR/MXN exchange rate applied to the balance sheet is 21.118 as at 31 December 2025 and 21.5504 as at 31 December 2024.

Risks



139	Strategic risk management and control processes
140	Main milestones achieved in 2025 in relation to risk management and control

Risks

During 2025, Banco Sabadell Group has continued to strengthen its global risk framework by making improvements to bring it in line with best practice in the financial sector.

The Group continues to have a medium-low risk profile, in accordance with the risk appetite defined by the Board of Directors.

The Group’s risk strategy is fully implemented and linked to the Strategic Plan and the Group’s risk-taking capacity, articulated through the Risk Appetite Statement (RAS), under which all material risks are monitored, tracked and reported, and the necessary control and remediation systems are in place to ensure compliance therewith.

5.1 Strategic risk management and control processes



5.2 Main milestones achieved in 2025 in relation to risk management and control

The most salient aspects concerning the management of the first-tier risks identified in Banco Sabadell Group's risk taxonomy and concerning the actions taken in this regard in 2025 are set out below:

Strategic risk

Definition: the risk of losses (or negative impacts in general) materialising as a result of making strategic decisions or of their subsequent implementation. It also includes the inability to adapt the Group's business model to changes in the environment in which it operates.

Key milestones in 2025:

(1) Strategy and reputation

- On 23 July 2025, the Board of Directors of Banco Sabadell approved the new 2025-2027 Strategic Plan. The Plan outlines the strategic direction of the Group and provides an outlook on its key financial figures. This Plan is structured around four pillars: (i) focus on Spain as the main market, taking advantage of its favourable macroeconomic outlooks, (ii) profitable growth with above-market acceleration in volumes (lending and fees and commissions) while preserving asset quality, (iii) ability to implement mature transformation initiatives to improve efficiency and cost of risk, and (iv) attractive shareholder remuneration underpinned by high levels of recurrent organic capital generation and a policy for returning excess capital above the 13% fully-loaded CET1 ratio, supplemented by the extraordinary dividend linked to the sale of TSB. Overall, the plan centres on business growth and improved profitability, enhancing the value of the strategic initiatives implemented in recent years.
- Although 2025 saw the unfolding of several macroeconomic and geopolitical events that were initially feared to negatively impact the Bank's profit levels, these effects did not materialise. Despite heightened global uncertainty and a deteriorating geopolitical context, the economic environment has evolved more favourably than expected, supported by robust growth in Spain and the ongoing monetary normalisation in the Eurozone. Similarly, the hostile takeover bid, which ended in October, did not adversely affect commercial activity or the Institution's operations in a sustained or significant manner.
- Against this backdrop, the positive performance of the business – both in terms of lending and funds – together with growth in fees and commissions, cost discipline and a sustained improvement in the risk profile, have enabled the Group to exceed its initial forecasts. All in all, these factors have contributed positively and are allowing the Group to achieve its profitability targets.
- The Group is exposed to reputational risk inherent in the sector in which it operates, characterised by significant visibility among customers and the general public, as explained in Note 4.4.1.3 to the annual financial statements.

(2) Capital position

- The phase-in CET1 ratio stood at 13.16% as at 2025 year-end, particularly driven by organic capital generation. Regulatory requirements in relation to capital are generally being met.
- The phase-in Total Capital ratio has improved, ending 2025 at 18.23%.
- As at the end of 2025, the phase-in leverage ratio stood at 5.40%, representing an increase of 21 basis points compared to 2024.

Credit risk

Definition: risk of incurring losses as a result of borrowers failing to fulfil their payment obligations, or of losses in value materialising due simply to the deterioration of borrowers' credit quality.

Key milestones in 2025:

(1) Non-performing assets

- During 2025, non-performing assets were reduced by 877 million euros. The NPL ratio for the year stood at 2.37%.

(2) Concentration

- From a sectoral point of view, the loan portfolio is diversified and has limited exposure to the sectors most sensitive to the current economic environment.
- Similarly, in terms of individual concentration, the risk metrics relating to concentrations of large exposures show a largely stable trend and remain within the appetite level. The sectoral credit scores have also remained stable and within the appetite level.
- Geographically speaking, the portfolio is positioned in the most dynamic regions, both in Spain and worldwide. International exposures account for 36% of the loan book.

(3) Lending performance

- Gross performing loans ended the year 2025 with a balance of 160,708 million euros, increasing by 2.4% year-on-year.
- In Spain, gross performing loans increased by 4.9% year-on-year, growing across all segments, but particularly in the mortgage book.

(4) TSB lending performance

- In TSB, at a constant exchange rate, gross performing loans remained stable.

Financial risk

Definition: possibility of obtaining inadequate returns or having insufficient levels of liquidity that prevent an institution from meeting future requirements and expectations.

Key milestones in 2025:

(1) Sound liquidity position

- Sound liquidity position where the Liquidity Coverage Ratio (LCR) stood at 186% for the Group (205% for the TSB LMU and 209% for Banco Sabadell Spain) and the Net Stable Funding Ratio (NSFR) stood at 139% for the Group (151% for the TSB LMU and 133% for Banco Sabadell Spain) as at 2025 year-end.
- The Loan-to-Deposit (LtD) ratio as at the end of 2025 was 93.5%, with a balanced retail funding structure.
- Moreover, Banco Sabadell has fulfilled the capital markets issuance plan that it had set itself for 2025, with strong investor appetite, allowing it to optimise the associated funding costs.

(2) Structural interest rate risk

- In 2025, the Bank's loan book has continued to see a growing proportion of fixed-rate transactions (mainly mortgages and business loans), while in terms of liabilities, there has been an increase in demand deposit balances, with larger balances held in interest-bearing accounts and with the cost falling in line with the interest rate cuts made throughout the year (mainly in the 12-month Euribor). In addition, other balance sheet variations in 2025 include the increase in the fixed-income portfolio on the asset side, which acts as a management lever and natural hedge for the balance sheet, and the implementation of management actions to defend and optimise net interest income.

Operational risk

Definition: risk of incurring losses due to inadequate or failed internal processes, people and systems or due to external events. This definition includes but is not limited to compliance risk, model risk and Information and Communication Technology (ICT) risk, and excludes strategic risk and reputational risk.

Operational risk remains a significant risk for the Group, although its impact measured in terms of operational losses can be absorbed during the normal course of the business.

Key milestones in 2025:

(1) Conduct risk

- The current situation of high awareness and increased regulatory pressure, aimed especially at providing greater protection for consumers and vulnerable customers, requires conduct risks to be the main focus of attention. The current materiality and the expectation that this situation will likely continue requires the focus to remain fixed on these risks, tracking their evolution and adequately monitoring the planned mitigation measures.

- The focus remains on complaints related to floor clauses, mortgage application and arrangement fees, interest associated with revolving credit cards, and appropriate assistance for vulnerable customers.

(2) Compliance risk

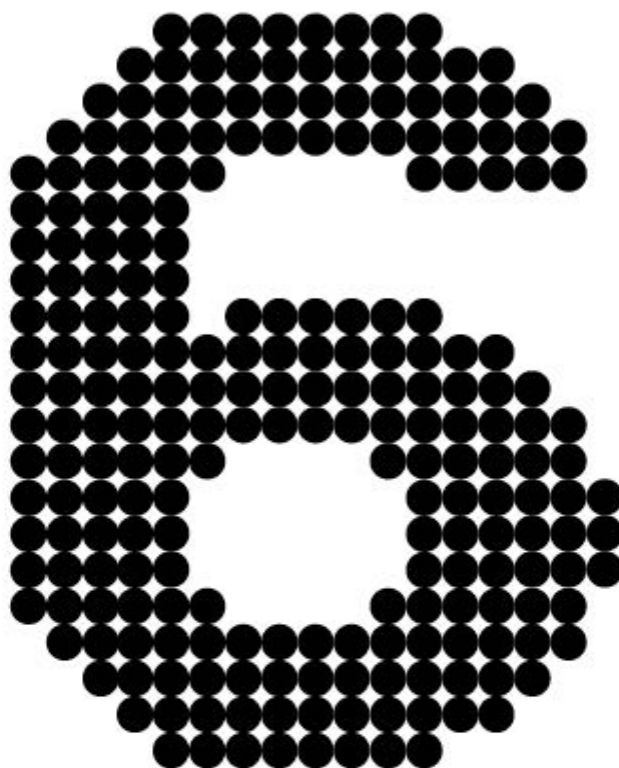
In accordance with Banco Sabadell's Compliance Policy and observing the EBA's Guidelines on Internal Governance, a Compliance Programme is drawn up, applying the principle of proportionality according to the size, complexity of activities and materiality of the risks taken, containing a detailed schedule of activities, including, among other aspects, the review of policies and procedures, risk assessment, the definition and execution of control plans and staff training in relation to compliance. This programme covers all services provided and activities carried out by Compliance and defines its priorities based on the risk assessment, in coordination with the Risk Control function. Monitoring exercises are conducted and regular reports on them are made to the Group's governing bodies in order to identify any deviations and resolve them quickly and effectively.

In 2025, efforts continued to be made to promote a culture of ethics and compliance among employees, interacting on an ongoing basis with the main supervisory authorities in connection with the Bank's compliance activity.

Main priorities for 2026:

- Align the organisation and its AML/CFT control model with the EU's AML/CFT reform package, as part of the establishment of the new European AML Authority (AMLA).
- Strengthen control metrics, monitor commercial activity and enhance reporting to governing bodies to prevent conduct risk in customer interactions.
- Promote a corporate plan to reinforce a Compliance Plus Culture.

Other material disclosures



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Other material disclosures

6.1 R&D and innovation

In the area of technology, Banco Sabadell Group is deepening its approach of providing each geography with the functionalities that best adapt to the needs of the market in question, supported by enhanced capabilities and standards aligned with industry best practices.

In 2025, the digitalisation of processes and products accelerated across all segments in Spain, with significant developments such as the expansion of the digital catalogue, the development of the new mobile app and the incorporation of AI-driven technology enablers. In parallel, the resilience of the IT platform was strengthened by the consolidation of the journey to cloud, the upgrade of critical infrastructures and improvements in cyber defence capabilities. At the international level, TSB upgraded its mainframe and core banking services, while Banco Sabadell Mexico migrated customers to the new online platform and optimised key services such as tax payments, further supplemented by the digitalisation of foreign branches and global services in Corporate Banking.

In the domestic context

In 2025, the Institution continued to leverage technological innovation as a strategic lever for competitiveness and improved customer experience. The development of new products for each business line was set as a priority, introducing solutions that expand the digital catalogue and enhance the value proposition.

In Retail Banking, the digital product offer was revamped with new products for insurance, mortgages and payment services, including cards and Bizum. In Business Banking, processes were further digitalised for the segment comprised of self-employed workers and small businesses, improving onboarding and product arrangement systems, and marketing new card products. Private Banking developed solutions tailored to high-net-worth individuals, while Corporate Banking initiated projects for treasury products scheduled for distribution in 2026.

Another important milestone was the development of the new mobile app to be launched in 2026, alongside the implementation of AI-driven technology enablers to facilitate future innovations. In parallel, the resilience of the IT platform was strengthened through actions to reduce application obsolescence, consolidate the journey to cloud and upgrade critical infrastructures such as ATMs and devices.

In the area of information security, cyber defence and fraud & scam prevention capabilities have been bolstered, with the introduction of smart systems to improve productivity and service quality. These initiatives are also supported by improvements in data management and the IT infrastructure, geared towards facilitating the Institution's digital growth.

In 2025, these investments in technology at the national level (including technology investments in the foreign branches) amounted to 329 million euros, which were invested in different companies, notably including 303 million euros in Sabadell Digital, S.A.U.

In the international context

In TSB (the UK subsidiary), most activities in the first half of the year focused on upgrading its mainframe and core banking systems. These initiatives strengthened its technological resilience and operational continuity in a critical environment.

Banco Sabadell Mexico made progress on migrating customers to the new online banking platform, improving the digital experience and ensuring regulatory compliance. Furthermore, the tax payment service was optimised, increasing the efficiency and speed of these transactions.

In the area of Corporate Banking, the digitalisation of foreign branches and the enhancement of global services such as factoring and guarantee systems have been advanced, consolidating the Group's international offering.

Technology investments on an international scale during 2025 (booked in the accounts under "Other intangible assets") amounted to 58.1 million euros at TSB Banking Group plc, and 17.3 million euros invested by the Mexican entity Institución Banca Múltiple (IBM).

6.2 Acquisition and sale of treasury shares

See Note 23 to the consolidated annual financial statements.

6.3 Days payable outstanding

The average time taken to pay suppliers (days payable outstanding) by consolidated entities located in Spain was 25.48 days (26.82 days in the case of the Bank).

6.4 Material post-closing events

Since 31 December 2025, there have been no significant events worthy of mention, with the exception of those described below:

At its meeting held on 5 February 2026, the Board of Directors, in agreement with César González-Bueno Mayer, approved his replacement as Chief Executive Officer of Banco Sabadell and accepted his resignation as a Director of the Institution, effective as of the upcoming Annual General Meeting. The Board of Directors also approved the appointment of Marc Armengol Dulcet as a new Executive Director with the status of Chief Executive Officer to fill the vacancy that will arise from César González-Bueno Mayer's resignation. With a view to ensuring continuity in the performance of the duties associated with the position of Chief Executive Officer and promoting an orderly transition, the resignation and appointment will take effect at the end of the Bank's upcoming Annual General Meeting, provided that the European Central Bank's fit and proper assessment for the appointment of Marc Armengol Dulcet has been received by that time. If received after the aforementioned General Meeting, the handover will take place on the date on which such fit and proper assessment is received.

Moreover, at the aforementioned meeting of 5 February 2026, the Board of Directors approved the appointment of Carlos Ventura Santamans as Executive Director of this body, with responsibility for the business in Spain, encompassing Business Banking, Retail Banking, Private Banking and the branch network.

6.5 Other reports related to the consolidated Directors' Report

Consolidated Non-Financial and Sustainability Disclosures Report of Banco de Sabadell, S.A. and subsidiaries (Sustainability Report)

In accordance with prevailing business regulations on non-financial disclosures and in line with the provisions of Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 as regards corporate sustainability reporting (CSRD) and with the recommendations of the joint statement issued by the CNMV and Spain's Accounting and Audit Institute (Instituto de Contabilidad y Auditoría de Cuentas, or ICAC) on 19 November 2025, Banco Sabadell Group has prepared the consolidated Non-Financial and Sustainability Disclosures Report of Banco de Sabadell, S.A. and subsidiaries (Sustainability Report) for 2025, which, as established in Article 44 of Spain's Commercial Code, forms part of this consolidated Directors' Report and is included as a separate accompanying document..

Annual Corporate Governance Report

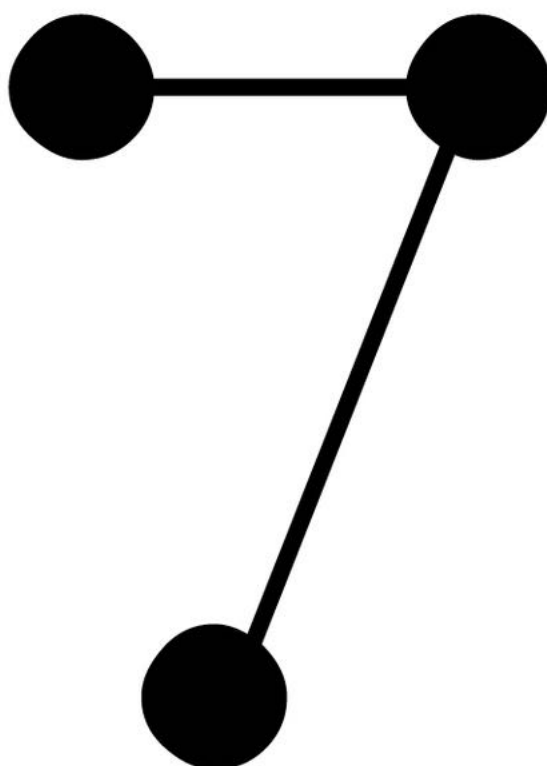
The Annual Corporate Governance Report corresponding to the 2025 financial year forms an integral part of the consolidated Directors' Report in accordance with the provisions of the Spanish Capital Companies Act. This report is signed off by the Board of Directors on the same date as the consolidated annual financial statements and consolidated Directors' report and is sent separately to the CNMV. From the date of publication of the consolidated annual financial statements and consolidated Directors' report, it is available on the CNMV's website (www.cnmv.es) and on the corporate website of Banco Sabadell Group (www.grupbancsabadell.com).

Annual Report on Director Remuneration

The Annual Report on Director Remuneration corresponding to the 2025 financial year forms an integral part of the consolidated Directors' Report in accordance with the provisions of the Spanish Capital Companies Act. This report is signed off by the Board of Directors on the same date as the consolidated annual financial statements and consolidated Directors' report and is sent separately to the CNMV. From the date of publication of the consolidated annual financial statements and consolidated Directors' report, it is available on the CNMV's website (www.cnmv.es) and on the corporate website of Banco Sabadell Group (www.grupbancsabadell.com).

www.grupbancsabadell.com

Performance measures and reconciliation with management indicators



- 151 Alternative performance measures in the Group
- 159 Reconciliation between the income statements used for statutory reporting and those used for management reporting
- 161 Equivalence of balance sheet and income statement line items in segment reporting and management reporting with those set out in the published consolidated balance sheet and income statement

Performance measures and reconciliation with management indicators

In the presentation of its results to the market, and for the purpose of business monitoring and decision-making processes, the Group uses performance indicators pursuant to the generally accepted accounting regulations (EU-IFRS), and also uses other unaudited measures commonly used in the banking industry (Alternative Performance Measures, or APMs) as indicators to monitor the management of the Group's assets and liabilities, as well as its financial and economic situation, which facilitates its comparison with other institutions.

Following the ESMA guidelines on APMs (ESMA/2015/1415 of October 2015), the purpose of which is to promote the use and transparency of information for the protection of investors in the European Union, the Group indicates below the definition, calculation and reconciliation for each APM.

Following the recommendations of the aforesaid guidelines, details of the APMs used are set out below, as well as the reconciliation of certain management indicators with those contained in the consolidated financial statements as at 2025 year-end. Figures are expressed in millions of euros unless otherwise indicated.

The reconciliation between the public consolidated profit and loss account and the income statement used for management reporting, as shown in this Directors' Report for the years 2025 and 2024, is set out below. The main difference between both is the treatment of the profit and loss generated by TSB and its subsidiary undertakings, following the agreement for its sale to Banco Santander. As explained in Note 1.4 to the consolidated annual financial statements, that sale agreement requires the profit and loss generated by those companies in 2025 and 2024 to be disclosed under the heading "Profit or loss after tax from discontinued operations". In the Group's income statement used for management reporting, on the other hand, the profit and loss of TSB and its subsidiary undertakings is still disclosed in disaggregated form, as it has been in previous years.

Similarly, in October 2025, the Bank and Nexi S.p.A. terminated the agreement for the sale of Paycomet, S.L.U., severing the strategic partnership for the merchant acquiring service signed by both parties in 2023 (see Note 2 to the consolidated annual financial statements for 2025). As a result, the consolidated income statement for 2024, which is included for the purposes of comparison in the notes to the consolidated financial statements for 2025, has been restated, and is thus shown as though no agreement to sell this business had ever been reached. In the income statements used for management reporting, on the other hand, the profit and loss figures for 2024 have not been restated.

Alternative performance measures in the Group

1. Profitability and efficiency

1.1 Return On Assets (ROA)

Million euro

		31/12/2025	31/12/2024
Numerator	(+) Consolidated profit or loss	1,777	1,829
Denominator	(+) Average total assets	245,221	242,145
Ratio	(=) ROA	0.7%	0.8%

This ratio comprises the following items:

- **Consolidated profit or loss:** corresponds to the profit or loss for the financial year.
 - **Average total assets:** the arithmetic mean of the Group's daily asset balance over the past twelve months.
- Relevance of use:** measure commonly used in the financial sector to determine the accounting return on the Group's assets.

1.2 Return On Equity (ROE)

Million euro

		31/12/2025	31/12/2024
Numerator	(+) Profit attributed to the Group	1,775	1,827
Denominator	(+) Average shareholders' equity	14,952	14,738
Ratio	(=) ROE	11.9%	12.4%

This ratio comprises the following items:

- **Profit attributed to the Group:** corresponds to the profit during the financial year attributable to owners of the parent.
 - **Average shareholders' equity:** the arithmetic mean of shareholders' equity on the last day of each month over the past twelve months.
- Relevance of use:** measure commonly used in the financial sector to determine the accounting return on shareholders' equity.

1.3 Return on Risk-Weighted Assets (RORWA)

Million euro

		31/12/2025	31/12/2024
Numerator	(+) Consolidated profit or loss	1,777	1,829
Denominator	(+) Average risk-weighted assets	79,512	79,687
Ratio	(=) RORWA	2.2%	2.3%

This ratio comprises the following items:

- **Consolidated profit or loss:** corresponds to the profit or loss for the financial year.
 - **Average risk-weighted assets:** the arithmetic mean of the Group's balance of assets weighted according to their respective risk factors on the last day of each month over the past twelve months. Risk factors reflect the perceived level of risk of a particular asset class.
- Relevance of use:** this is a more sophisticated ROA metric that indicates the accounting return obtained on risk-weighted assets, thereby introducing a correction factor to profitability figures according to the level of risk taken.

1.4 Return On Tangible Equity (ROTE)

Million euro

		31/12/2025	31/12/2024
Numerator	(+) Profit attributed to the Group	1,775	1,827
Denominator	(+) Average shareholders' equity excl. intangibles	12,422	12,235
	(+) Average shareholders' equity	14,952	14,738
	(-) Average intangible assets	2,530	2,503
Ratio	(=) ROTE	14.3%	14.9%

This ratio comprises the following items:

- **Profit attributed to the Group:** corresponds to the profit during the financial year attributable to owners of the parent.
- **Average shareholders' equity excluding intangible assets:** the arithmetic mean of shareholders' equity on the last day of each month over the past twelve months, minus the amount of intangible assets.

Relevance of use: measure commonly used in the financial sector to determine the accounting return on shareholders' equity after deducting intangible assets.

1.5 Cost-to-income ratio

Million euro

		31/12/2025	31/12/2024
Numerator	(+) Total operating costs	3,100	3,084
	(+) Total operating costs from continuing operations	2,288	2,234
	(+) Total operating costs from discontinued operations	812	850
Denominator	(+) Gross income	6,284	6,337
	(+) Gross income from continuing operations	4,896	4,958
	(+) Gross income from discontinued operations	1,388	1,379
Ratio	(=) Cost-to-income ratio	49.3%	48.7%

This ratio comprises the following items:

- **Total operating costs:** found by taking the sum of administrative, depreciation and amortisation expenses from the consolidated income statement for the financial year.
- **Gross income:** taken directly from the Gross income line item of the consolidated income statement for the financial year.

Relevance of use: this is one of the main indicators used to measure the productivity of banking activity.

1.6 Customer spread

Million euro

		31/12/2025	31/12/2024
Numerator	(+) Return on customer loans	6,336	6,726
Denominator	(+) Average balance of customer loans	159,198	154,131
(A)	(=) Average annual rate on customer loans	3.98%	4.36%
Numerator	(+) Return on customer deposits	1,693	1,997
Denominator	(+) Average balance of customer deposits	167,305	162,250
(B)	(=) Average annual rate on customer deposits	1.01%	1.23%
(A) - (B)	(=) Customer spread	2.97%	3.13%

The ratio is calculated as the difference between:

- **Average annual rate on customer loans:** obtained by finding the ratio of annualised interest revenue from customer loans relative to the average daily balance of customer loans. The average balance is the arithmetic mean, calculated by taking the sum of the daily balances for the reference period divided by the number of days in said period.

- **Average annual rate on customer deposits:** obtained by finding the ratio of annualised interest expense on customer deposits relative to the average daily balance of customer funds. The average balance is the arithmetic mean, calculated by taking the sum of the daily balances for the reference period divided by the number of days in said period.

Relevance of use: reflects the profitability of solely banking activity.

It makes it possible to track the spread generated between the average yield on customer loans and the average cost of customer deposits.

2. Risk management

2.1 Credit cost of risk

In million euro and basis points

		31/12/2025	31/12/2024
Numerator	(+) Provisions for loan losses	481	567
	(+) Provisions for loan losses from continuing operations	426	531
	(+) Provisions for loan losses from discontinued operations	55	36
Numerator	(-) Expenses on NPLs	109	118
Denominator	(+) Gross loans, excl. reverse repos	164,906	161,717
Denominator	(+) Financial guarantees and other guarantees given	8,540	8,699
Ratio	(=) Credit cost of risk	21	26

This ratio comprises the following items:

- **Provisions for loan losses:** this comprises the Provisions for loan losses heading in the consolidated income statement used for management reporting.
- **Expenses on NPLs:** costs associated with the management of loans classified in stage 3 (Non-Performing Loans, or NPLs).
- **Gross loans, excluding reverse repos:** obtained by taking customer loans and advances from the consolidated balance sheet and then (i) adding impairment allowances, (ii) subtracting reverse repos, and (iii) adding stage 3 exposures of credit institutions.
- **Financial guarantees and other guarantees given:** consists of financial guarantees and other guarantees given under off-balance sheet exposures.

Relevance of use: this is one of the main indicators used in the banking industry to measure the credit risk performance of institutions, by giving the ratio of credit risk provisions booked over the past twelve months relative to the total loan book.

2.2 Total cost of risk

In million euro and basis points

		31/12/2025	31/12/2024
Numerator	(+) Total provisions and impairments	546	714
	(+) Total provisions and impairments from continuing operations	491	676
	(+) Total provisions and impairments from discontinued operations	55	37
Denominator	(+) Gross loans, excl. reverse repos	164,906	161,717
Denominator	(+) Financial guarantees and other guarantees given	8,540	8,699
Denominator	(+) Non-performing real estate assets	684	836
Ratio	(=) Total cost of risk	31	42

This ratio comprises the following items:

- **Total provisions and impairments:** comprises the following line items included in the consolidated income statement used for management reporting: (i) Provisions for loan losses, (ii) Provisions for other financial assets, and (iii) Other provisions and impairments.
- **Gross loans, excluding reverse repos:** obtained by taking customer loans and advances from the consolidated balance sheet and then (i) adding impairment allowances, (ii) subtracting reverse repos, and (iii) adding stage 3 exposures of credit institutions.
- **Financial guarantees and other guarantees given:** consists of financial guarantees and other guarantees given under off-balance sheet exposures.
- **Non-performing real estate assets:** consists of real estate assets foreclosed or received in lieu of debt and real estate assets classified in the portfolio of non-current assets and disposal groups classified as held for sale, except for investment properties with significant unrealised capital gains and those under lease for which there is a final agreement for a sale to take place following refurbishment.

Relevance of use: risk metric used to measure the credit risk performance of institutions by giving the ratio of total provisions and impairments booked relative to the total amount of the credit book and non-performing real estate assets.

2.3 Stage 3 coverage ratio, with total provisions

Million euro

		31/12/2025	31/12/2024
Numerator	(+) Total hedging	2,626	2,990
	(+) Impairment allowances	2,551	2,848
	(+) Provisions recognised under liabilities on balance sheet	75	142
Denominator	(+) Stage 3 exposures	4,119	4,844
	(+) Stage 3 assets	3,988	4,637
	(+) Stage 3 financial guarantees and other guarantees given	131	207
Ratio	(=) Stage 3 coverage ratio, with total provisions	63.8%	61.7%

This ratio comprises the following items:

- **Total hedging:** formed of the sum of (i) all impairment allowances for assets on the consolidated balance sheet, and (ii) provisions recognised under liabilities on the consolidated balance sheet associated with off-balance sheet exposures.
- **Stage 3 exposures:** formed of (i) assets classified as stage 3 including other valuation adjustments (accrued interest, fees and commissions, and others) of debt securities and of loans and advances to credit institutions and to customers, and (ii) financial guarantees and other guarantees given classified as stage 3 under exposures off the consolidated balance sheet.

Relevance of use: key ratio used in the banking industry to monitor the status and performance of institutions' credit risk. It shows the level of accounting provisions that the Institution has allocated for assets classified as stage 3.

2.4 NPL ratio

Million euro		31/12/2025	31/12/2024
Numerator	(+) Stage 3 exposures	4,119	4,844
	(+) Stage 3 assets	3,988	4,637
	(+) Stage 3 financial guarantees and other guarantees given	131	207
Denominator	(+) Gross loans, excl. reverse repos	164,906	161,717
	(+) Financial guarantees and other guarantees given	8,540	8,699
Ratio	(=) NPL ratio	2.37%	2.84%

This ratio comprises the following items:

- **Stage 3 exposures:** comprised of (i) assets classified as stage 3 including other valuation adjustments (accrued interest, fees and commissions, and others) of debt securities and of loans and advances to credit institutions and to customers, and (ii) financial guarantees and other guarantees given classified as stage 3 under exposures off the consolidated balance sheet.
- **Gross loans, excluding reverse repos:** obtained by taking customer loans and advances from the consolidated balance sheet and then (i) adding impairment allowances, (ii) subtracting reverse repos, and (iii) adding stage 3 exposures of credit institutions.
- **Financial guarantees and other guarantees given:** consists of financial guarantees and other guarantees given under exposures off the consolidated balance sheet.

Relevance of use: a key indicator used in the banking industry to monitor the status and performance of the quality of credit risk undertaken with customers. This metric shows balances classified as impaired (stage 3) relative to the total loan book.

3. Liquidity management

3.1 Loan-to-Deposit (LTD) ratio

Million euro		31/12/2025	31/12/2024
Numerator	(+) Loans and advances to customers, excl. reverse repos and brokered loans	161,066	157,988
	(+) Loans and advances to customers, excl. reverse repos	162,366	158,872
	(-) Brokered loans	1,300	884
Denominator	(+) On-balance sheet customer funds	172,265	169,557
Ratio	(=) LTD	93.5%	93.2%

This ratio comprises the following items:

- **Loans and advances to customers, excluding reverse repos and brokered loans:** taken from the consolidated balance sheet line item Loans and advances to customers, not including reverse repos and brokered loans.
- **On-balance sheet customer funds:** comprised of financial liabilities at amortised cost on the consolidated balance sheet, excluding non-retail liabilities, such as deposits from central banks, deposits from credit institutions, institutional issues and other financial liabilities.

Relevance of use: measures the liquidity of a bank by showing the total volume of customer loans relative to funds available in customer deposits. Liquidity is one of the key aspects that define the structure of an institution.

4. Share price indicators

4.1 Earnings Per Share (EPS)

Million euro		31/12/2025	31/12/2024
Numerator	(+) Adjusted profit attributed to the Group	1,630	1,729
	(+) Profit attributed to the Group	1,775	1,827
	(-) Remuneration on Additional Tier 1(AT1) instruments	146	98
Denominator Million shares	(+) Weighted average number of total ordinary shares minus average number of treasury shares	5,152	5,376
Ratio	(=) EPS	0.32	0.32

This ratio comprises the following items:

- **Adjusted profit attributed to the Group:** corresponds to the profit during the financial year attributable to owners of the parent, adjusted by the amount of remuneration paid on Additional Tier 1 (AT1) instruments.
- **Weighted average number of total ordinary shares minus average number of treasury shares:** formed of the average number of shares outstanding (average number of total shares minus the average number of treasury shares, including share buyback programmes, where applicable).

Relevance of use: an economic measurement or market ratio that indicates a company's profitability, and it is one of the measurements used most frequently to assess institutions' performance.

4.2 Book value per share

Million euro

		31/12/2025	31/12/2024
Numerator	(+) Shareholders' equity	14,631	15,389
Denominator	(+) Number of total shares minus treasury shares as at closing date	4,998	5,361
Ratio	(=) Book value per share	2.93	2.87

This ratio comprises the following items:

- **Shareholders' equity:** corresponds to the shareholders' equity stated on the consolidated balance sheet.
 - **Number of total shares minus treasury shares:** formed of the total number of shares minus treasury shares including share buyback programmes, where applicable, as at the closing date.
- Relevance of use:** this is an economic market measurement or market ratio that indicates the book value per share issued.

4.3 Tangible Book Value (TBV) per share

Million euro

		31/12/2025	31/12/2024
Numerator	(+) Tangible book value	11,988	12,840
	(+) Shareholders' equity	14,631	15,389
	(-) Intangible assets	2,642	2,549
Denominator	(+) Number of total shares minus treasury shares as at closing date	4,998	5,361
Ratio	(=) TBV per share	2.40	2.39

This ratio comprises the following items:

- **Tangible book value:** formed of the consolidated balance sheet line item Shareholders' equity excluding intangible assets.
 - **Number of total shares minus treasury shares:** formed of the total number of shares minus treasury shares including share buyback programmes, where applicable, as at the closing date.
- Relevance of use:** this is an economic market measurement or market ratio that indicates the book value, after deducting intangible assets, per share issued.

4.4 Price to Tangible Book Value (P/TBV)

Euro

		31/12/2025	31/12/2024
Numerator	(+) Share price	3.365	1.877
Denominator	(+) TBV per share	2.40	2.39
Ratio	(=) P/TBV	1.40	0.78

This ratio comprises the following items:

- **Share price:** formed of the price or market value of the share as at the closing date.
 - **TBV per share:** consists of the tangible value per share as at the closing date.
- Relevance of use:** an economic measurement or market ratio commonly used by the market to value listed entities; it represents the share price of a listed entity relative to its book value per share.

4.5 Price to Earnings Ratio (PER)

Euro

		31/12/2025	31/12/2024
Numerator	(+) Share price	3.365	1.877
Denominator	(+) Earnings Per Share (EPS)	0.32	0.32
Ratio	(=) PER	10.64	5.84

This ratio comprises the following items:

- **Share price:** formed of the price or market value of the share as at the closing date.
- **Earnings Per Share (EPS):** formed of the attributable earnings per share.

Relevance of use: an economic measurement or market ratio commonly used by the market to determine a company's ability to generate future earnings.

Reconciliation between the income statements used for statutory reporting and those used for management reporting

Million euro

Public consolidated income statement	31/12/2025	Adjustments related to the sale of TSB	Other management adjustments	31/12/2025	Income statement used for segment reporting and management reporting
Net interest income	3,537	1,300	—	4,837	Net interest income
Fee and commission income	1,614	90	—	1,384	Net fees and commissions
Fee and commission expenses	(320)	—	—	—	—
	4,831	1,390	—	6,221	Core revenue
Dividend income	4	—	—	181	Equity-accounted income and dividends
Profit or loss of entities accounted for using the equity method	177	—	—	—	—
Net profit or net loss on financial operations	680	11	—	4	Profit or loss on financial operations and exchange differences
Exchange differences [gain or loss], net	(687)	—	—	—	—
Other operating income	51	(12)	—	(122)	Other operating income and expenses
Other operating expenses	(160)	—	—	—	—
Gross income	4,896	1,388	—	6,284	Gross income
Administrative expenses	(1,867)	(733)	—	(2,600)	Operating expenses
Depreciation and amortisation	(421)	(79)	—	(500)	Depreciation and amortisation
	2,608	576	—	3,184	Pre-provisions income
Provisions or reversal of provisions	22	4	(65)	(39)	Provisions for other financial assets
Impairment or reversal of impairment on financial assets not measured at fair value through profit or loss and net modification losses or gains	(486)	(60)	65	(481)	Provisions for loan losses
Profit or loss on operating activities	2,143	521	—	2,664	
Impairment or reversal of impairment on investments in joint ventures and associates	—	—	—	—	—
Impairment or reversal of impairment on non-financial assets	(28)	—	3	(27)	Other provisions and impairments
Profit or loss from non-current assets and disposal groups classified as held for sale not qualifying as discontinued operations	(1)	—	—	—	—
Gains or losses on derecognition of non-financial assets, net	(34)	1	(3)	(37)	Capital gains on asset sales and other revenue
Profit or loss before tax from continuing operations	2,080	522	—	2,601	Profit or loss before tax
Tax expense or income related to profit or loss from continuing operations	(685)	(138)	—	(824)	Corporation tax
Profit or loss after tax from discontinued operations	383	(383)	—	—	—
Profit or loss for the year	1,777	—	—	1,777	
Attributable to minority interest [non-controlling interests]	2	—	—	2	Profit or loss attributed to minority interests
Attributable to owners of the parent	1,775	—	—	1,775	Profit attributed to the Group

Public consolidated income statement	31/12/2024	Adjustment s related to the sale of TSB	Other managem ent adjustmen ts (*)	31/12/2024	Income statement used for segment reporting and management reporting
Net interest income	3,761	1,260	—	5,021	Net interest income
Fee and commission income	1,561	107	—	1,357	Net fees and commissions
Fee and commission expenses	(311)	—	—	—	—
	5,011	1,367	—	6,378	Core revenue
Dividend income	6	—	—	166	Equity-accounted income and dividends
Profit or loss of entities accounted for using the equity method	160	—	—	—	—
Net profit or net loss on financial operations	(276)	35	—	87	Profit or loss on financial operations and exchange differences
Exchange differences [gain or loss], net	328	—	—	—	—
Other operating income	68	(23)	—	(294)	Other operating income and expenses
Other operating expenses	(339)	—	—	—	—
Gross income	4,958	1,379	—	6,337	Gross income
Administrative expenses	(1,826)	(765)	8	(2,583)	Operating expenses
Depreciation and amortisation	(436)	(85)	20	(501)	Depreciation and amortisation
	2,696	529	28	3,254	Pre-provisions income (*)
Provisions or reversal of provisions	(44)	—	(25)	(69)	Provisions for other financial assets
Impairment or reversal of impairment on financial assets not measured at fair value through profit or loss and net modification losses or gains	(554)	(38)	25	(567)	Provisions for loan losses
Profit or loss on operating activities	2,098	492	28	2,618	
Impairment or reversal of impairment on investments in joint ventures and associates	—	—	—	—	—
Impairment or reversal of impairment on non-financial assets	(40)	—	(24)	(78)	Other provisions and impairments
Profit or loss from non-current assets and disposal groups classified as held for sale not qualifying as discontinued operations	(14)	—	—	—	—
Gains or losses on derecognition of non-financial assets, net	(14)	(8)	(4)	(26)	Capital gains on asset sales and other revenue
Profit or loss before tax from continuing operations	2,030	484	—	2,514	Profit or loss before tax
Tax expense or income related to profit or loss from continuing operations	(559)	(127)	—	(685)	Corporation tax
Profit or loss after tax from discontinued operations	357	(357)	—	—	—
Profit or loss for the year	1,829	—	—	1,829	
Attributable to minority interest [non-controlling interests]	2	—	—	2	Profit or loss attributed to minority interests
Attributable to owners of the parent	1,827	—	—	1,827	Profit attributed to the Group

(*) Management adjustments mainly include the restatement of the consolidated income statement used for statutory reporting following the termination of the strategic agreement between the Bank and Nexi S.p.A. for the sale of Banco Sabadell's merchant acquiring business, resulting in the reclassification of 20 million euros from the heading "Profit or loss from non-current assets and disposal groups classified as held for sale not qualifying as discontinued operations" to the heading "Depreciation and amortisation".

Equivalence of balance sheet and income statement line items in segment reporting and management reporting with those set out in the published consolidated balance sheet and income statement

Balance sheet

Other assets:

- Derivatives – Hedge accounting.
- Fair value changes of the hedged items in portfolio hedge of interest rate risk.
- Tax assets.
- Other assets.

Other liabilities:

- Derivatives – Hedge accounting.
- Fair value changes of the hedged items in portfolio hedge of interest rate risk.
- Tax liabilities.
- Other liabilities.

Income statement

Net fees and commissions:

- Fee and commission income.
- Fee and commission expenses.

Core revenue:

- Net interest income.
- Fee and commission income.
- Fee and commission expenses.

Profit or loss on financial operations and exchange differences:

- Net profit or net loss on financial operations.
- Exchange differences [gain or loss], net.

Equity-accounted income and dividends:

- Dividend income.
- Profit or loss of entities accounted for using the equity method.

Other operating income and expenses:

- Other operating income.
- Other operating expenses.

Operating, depreciation and amortisation expenses:

- Administrative expenses.
- Depreciation and amortisation.

Pre-provisions income:

- Gross income.
- Administrative expenses.
- Depreciation and amortisation.

Total provisions and impairments:**Provisions for loan losses:**

- Impairment or reversal of impairment on financial assets not measured at fair value through profit or loss and net modification losses or gains.
- Provisions or reversal of provisions (including only commitments and guarantees given).

Provisions for other financial assets:

- Provisions or reversal of provisions (excluding commitments and guarantees given).

Other provisions and impairments:

- Impairment or reversal of impairment on investments in joint ventures and associates.
- Impairment or reversal of impairment on non-financial assets.
- Profit or loss from non-current assets and disposal groups classified as held for sale not qualifying as discontinued operations (excluding gains or losses on the sale of interests and other items).
- Gains or losses on derecognition of non-financial assets and interests, net (including only gains or losses on sale of investment properties).

Capital gains on asset sales and other revenue:

- Gains or losses on derecognition of non-financial assets and interests, net (excluding gains or losses on sale of investment properties).
- Profit or loss from non-current assets and disposal groups classified as held for sale not qualifying as discontinued operations (including only gains or losses on the sale of interests and other items).

Corporation tax:

- Tax expense or income related to profit or loss from continuing operations.

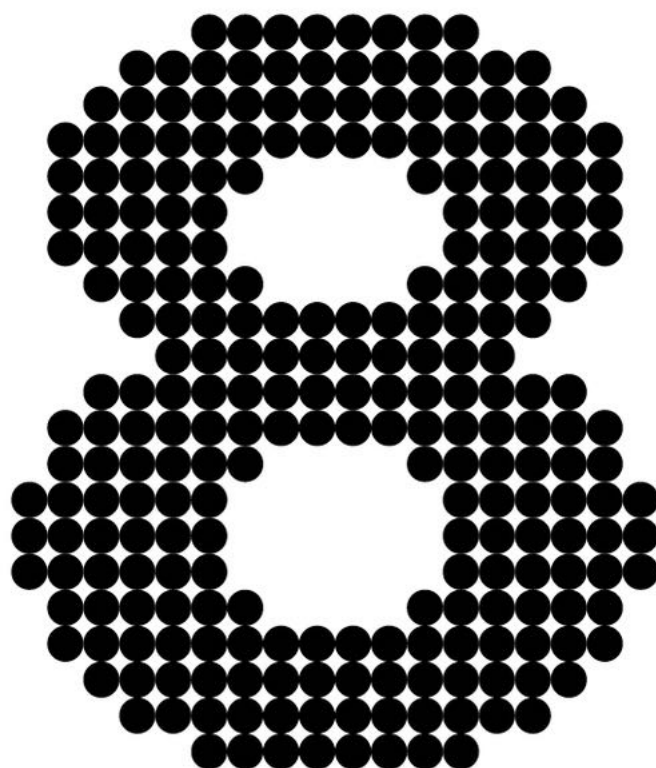
Profit or loss attributed to minority interests:

- Profit or loss attributable to minority interests [non-controlling interests].

Profit attributed to the Group:

- Profit or loss attributable to owners of the parent.

Glossary of acronyms and abbreviations



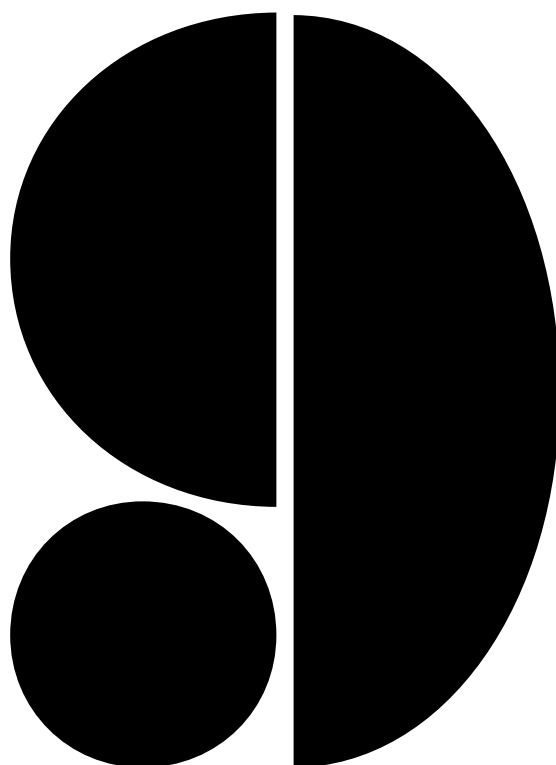
Glossary of acronyms and abbreviations

AEAT	Administración Estatal de Administración Tributaria (State agency for tax administration)	CRR	Capital Requirements Regulation
ALCO	Asset and Liability Committee	CSA	Credit Support Annex
AML/CFT	Anti-Money Laundering and Countering the Financing of Terrorism	CSRBB	Credit Spread Risk in the Banking Book
AMLA	Anti-Money Laundering Authority	CSRD	Corporate Sustainability Reporting Directive
ANA	<i>Atención a Autónomos, Negocios y Pymes</i> (customer care for self-employed persons, small businesses and SMEs)	CTA	Collateral Transfer Agreement
APM	Alternative Performance Measure	CVA	Credit Valuation Adjustment
AT1	Additional Tier 1	CXI	Customer Experience Indicator
ATA	Average Total Assets	DANA	<i>Depresión Aislada en Niveles Altos</i> (isolated high altitude depression phenomenon)
BIS	Bank for International Settlements	DGF	Deposit Guarantee Fund
BME	Bolsas y Mercados Españoles (Spanish stock market operator)	DGS	Deposit Guarantee Scheme
BoE	Bank of England	DIF	Deposit Insurance Fund
BoS	Bank of Spain	DLT	Distributed Ledger Technology
BRICS	Brazil, Russia, India, China and South Africa	DORA	Digital and Operational Resilience Act
BRRD	Bank Recovery and Resolution Directive	DVA	Debt Valuation Adjustment
BSEPP	Banco Sabadell Employee Pension Plan	EAD	Exposure At Default
BSMU	Balance Sheet Management Unit	EBA	European Banking Authority
CAPM	Capital Asset Pricing Model	EBICS	Electronic Banking Internet Communication Standard
CBR	Combined Buffer Requirement	EBITDA	Earnings Before Interest, Taxes, Depreciation and Amortisation
CCF	Credit Conversion Factor	ECB	European Central Bank
CCIRS	Cross Currency Interest Rate Swap	ECL	Expected Credit Loss
CCM	Market Confidence Charge	ECP	Euro Commercial Paper
CCP	Central Counterparty	EDIS I	European Deposit Insurance Scheme (Phase I)
CCyB	Countercyclical Capital Buffer	EIB	European Investment Bank
CDS	Credit Default Swap	EIF	European Investment Fund
CEO	Chief Executive Officer	EIR	Effective Interest Rate
CEOE	Confederación Española de Organizaciones Empresariales (Spanish confederation of employers' organisations)	EL	Expected Loss
CESCE	Compañía Española de Crédito a la Exportación (Spanish export credit company)	EMIR	European Market Infrastructure Regulation
CET1	Common Equity Tier 1	EMTN	Euro Medium Term Note
CGU	Cash Generating Unit	EPS	Earnings Per Share
CIRBE	Central de Información de Riesgos del Banco de España (Bank of Spain central credit register)	ESG	Environmental, Social and Governance
CMDI	Crisis Management and Deposit Insurance	ESMA	European Securities and Markets Authority
CME	Chicago Mercantile Exchange	ESRB	European Systemic Risk Board
CMOF	<i>Contrato Marco de Operaciones Financieras</i> (Spanish master agreement for financial transactions)	ETF	Exchange Traded Fund
CMU	Capital Markets Union	EU	European Union
CNAE	<i>Clasificación Nacional de Actividades Económicas</i> (Spanish national classification of economic activities)	EU-IFRS	IFRS as adopted by the European Union
CNMC	Comisión Nacional de los Mercados y la Competencia (Spanish national markets and competition commission)	EWI	Early Warning Indicator
CNMV	Comisión Nacional del Mercado de Valores (Spanish national securities market commission)	FCR	First Call Resolution
CONESTUR	Consejo Español de Turismo (Spanish tourism council)	Fed	Federal Reserve (USA)
CRD	Capital Requirements Directive	FIFO	First In First Out
CRE	Commercial Real Estate	FPC	Financial Policy Committee
		FSB	Financial Stability Board
		FVA	Funding Value Adjustment
		GDP	Gross Domestic Product
		GHG	Greenhouse Gas
		GMRA	Global Master Repurchase Agreement
		GMSLA	Global Master Securities Lending Agreement
		HAT	<i>Herramienta de Alertas Tempranas</i> (early warnings tool for companies)
		HQLA	High Quality Liquid Asset
		I.R.U.S.	<i>Identificador Registral Único de la Sociedad</i> (unique company identifier)
		IAS	International Accounting Standard

IASB	International Accounting Standards Board	OECD	Organisation for Economic Co-operation and Development
IBEX	Índice Bursátil Español (Spanish stock market index)	OM	Organised Market
ICAAP	Internal Capital Adequacy Assessment Process	OTC	Over The Counter
ICAC	Instituto de Contabilidad y Auditoría de Cuentas (Spanish accounting and auditing institute)	P/BV	Price to Book Value
ICO	Instituto de Crédito Oficial (Spanish official credit institute)	P/TBV	Price to Tangible Book Value
ICT	Information and Communication Technology	PD	Probability of Default
IDD	Insurance Distribution Directive	PEPP	Pandemic Emergency Purchase Programme
IDEC	<i>Impuesto sobre Depósitos de Entidades de Crédito</i> (Spanish tax on deposits of credit institutions)	PER	Price to Earnings Ratio
IFRIC	International Financial Reporting Interpretations Committee	PERTE	<i>Proyectos Estratégicos para la Recuperación y Transformación Económica</i> (strategic projects for economic recovery and transformation)
IFRS	International Financial Reporting Standard	PMA	Post Model Adjustment
ILAAP	Internal Liquidity Adequacy Assessment Process	POCI	Purchased or Originated Credit Impaired
IMF	International Monetary Fund	POS	Point Of Sale
IMIC	<i>Impuesto sobre el Margen de Intereses y Comisiones</i> (tax on net interest and commission income)	PRA	Prudential Regulation Authority
INE	Instituto Nacional de Estadística (Spanish office for national statistics)	PRIIP	Packaged Retail and Insurance-based Investment Product
IRB	Internal Ratings-Based	QT	Quantitative Tightening
IRCA	<i>Indicador de Riesgo Climático y Ambiental</i> (climate-related and environmental risk indicator)	RAF	Risk Appetite Framework
IRP	Insured Retirement Plan	RaRoC	Risk-adjusted Return on Capital
IRRBB	Interest Rate Risk in the Banking Book	RAS	Risk Appetite Statement
IRS	Interest Rate Swap	RIC	<i>Reglamento Interno de Conducta</i> (internal code of conduct relating to the securities market)
ISDA	International Swaps and Derivatives Association	RICS	Royal Institution of Chartered Surveyors
IT	Information Technology	RO	Representative Office
KPI	Key Performance Indicator	ROA	Return On Assets
LBO	Leveraged Buy Out	ROE	Return On Equity
LCP	Liquidity Contingency Plan	RoRAC	Return on Risk-Adjusted Capital
LCR	Liquidity Coverage Ratio	RORWA	Return on Risk Weighted Assets
LEI	Legal Entity Identifier	ROTE	Return On Tangible Equity
LGD	Loss Given Default	RRP	Reverse Repurchase Agreement
LMU	Liquidity Management Unit	RWA	Risk Weighted Asset
LRE	Leverage Ratio Exposure	SA	Standardised Approach
LSE	London Stock Exchange	SAC	<i>Servicio de Atención al Cliente</i> (customer care service)
LTD	Loan-to-Deposit ratio	SAP/SAPE	<i>Servicio Atención Preferente / Servicio Atención Preferente Empresas</i> (preferential care service / preferential care service for business banking customers)
LTV	Loan To Value	SAT	<i>Servicio de Administración Tributaria</i> (tax administration service)
M&A	Mergers and Acquisitions	SDG	Sustainable Development Goal
MDA	Maximum Distributable Amount	SGIIC	<i>Sociedad Gestora de Instituciones de Inversión Colectiva</i> (UCITS management company)
MiCA	Markets in Crypto Assets	SICAV	<i>Société d'Investissement à Capital Variable</i> (open-ended investment company)
MiFID	Markets in Financial Instruments Directive	SICR	Significant Increase in Credit Risk
MPM	Management Performance Measure	SIP	Share Incentive Plan
MREL	Minimum Requirement for own funds and Eligible Liabilities	SIU	Savings and Investments Union
MRR	<i>Mecanismo de Recuperación y Resiliencia</i> (recovery and resilience mechanism)	SLA	Service Level Agreement
MtM	Mark to Market	SME	Small and Medium-sized Enterprise
NBCA	New Basel Capital Accord	SPPI	Solely Payments of Principal and Interest
NFDR	Non-Financial Disclosures Report	SRB	Single Resolution Board
NGEU	Next Generation European Union	SREP	Supervisory Review and Evaluation Process
NGFS	Network of central banks and supervisors for Greening the Financial System	SRF	Single Resolution Fund
NIF	<i>Número de Identificación Fiscal</i> (Spanish tax identification number)	T1	Tier 1 capital
NIM	Net Interest Margin	T2	Tier 2 capital
NPL	Non-Performing Loan	TBV	Tangible Book Value
NPS	Net Promoter Score	TCFD	Task Force on Climate-related Financial Disclosures
NSFR	Net Stable Funding Ratio	TEAC	<i>Tribunal Económico-Administrativo Central</i> (Spanish central tax appeal board)
NYCB	New York Community Bancorp		
NYSE	New York Stock Exchange		

TFSME	Bank of England Term Funding Scheme for Small and Medium-sized Enterprises
TLAC	Total Loss-Absorbing Capacity
TLTRO	Targeted Longer-Term Refinancing Operations
TREA	Total Risk Exposure Amount
TSB	TSB Banking Group plc
UN	United Nations
USMCA	United States-Mexico-Canada Agreement
VaR	Value at Risk
VAT	Value Added Tax

Consolidated Non-Financial Disclosures and Sustainability Disclosures Report of Banco de Sabadell, Sociedad Anónima and subsidiaries (Sustainability Report)



**Consolidated Non-Financial and Sustainability
Disclosures Report of Banco de Sabadell, S.A.
and subsidiaries (Sustainability Report) for 2025**

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1. General information

1.1 Introduction

This document sets out the Consolidated Non-Financial and Sustainability Disclosures Report of Banco de Sabadell, S.A. and subsidiaries, hereinafter referred to as the Sustainability Report.

The scope of the Sustainability Report includes the entire Banco Sabadell Group, as it does in the financial statements. When the reported information does not cover the entire perimeter, this will be specifically indicated.

TSB, the Banco Sabadell subsidiary that has managed its retail banking business in the United Kingdom since 2015 and offers services to more than five million customers, is included within this perimeter. In 2025, however, Banco Sabadell agreed to sell this UK arm to Banco Santander. This transaction is expected to close in the first half of 2026, subject to regulatory approvals.

The regulatory framework under which this report is presented is Directive (EU) 2022/2464 of 14 December 2022 as regards corporate sustainability reporting (the Corporate Sustainability Reporting Directive, or CSRD). This directive, which amends Directive 2014/95/EU of 22 October 2014 as regards disclosure of non-financial and diversity information (NFRD), transposed into Spanish law by Law 11/2018 on non-financial and diversity disclosures, seeks to increase the transparency and comparability of reporting by companies on their Environmental, Social and Governance (ESG) performance.

The CSRD establishes that companies falling under its scope should disclose their non-financial information in accordance with common standards. In this context, the European Financial Reporting Advisory Group (EFRAG) was designated as the European Commission's technical advisor, with responsibility for developing and issuing this new framework of standards: the European Sustainability Reporting Standards (ESRS). EFRAG defined a total of 12 standards which encompass environmental, social and governance matters.

Section [1.2 Double materiality analysis](#) sets out details of how Banco Sabadell addresses and meets those standards.

The Institution has applied the transitional arrangements provided by Commission Delegated Regulation (EU) 2025/1416 of 11 July 2025, known as 'Quick Fix', which amends the Delegated Regulation adopting the ESRS and extends the application of the transitional arrangements by a further two years. Specifically, the Institution has applied the transitional arrangements relating to quantitative information on anticipated financial effects, both at a general level (SBM-3) and in relation to physical risk and transition risk (E1-9), and to the breakdown of revenue by significant sector, as well as the disclosure of entity-specific information.

In addition, the Sustainability Report remains compliant with the general provisions published in Law 11/2018 in relation to non-financial and diversity disclosures.

This report also includes information relating to Taxonomy-eligible exposures and/or exposures aligned with the Taxonomy Regulation (Regulation (EU) 2021/2178), which entered into force in January 2022. In relation to this regulation and in the context of the aforementioned “Quick Fix”, Commission Delegated Regulation (EU) 2026/73 was published in the Official Journal of the European Union on 8 January 2026. This regulation simplifies the content and information required under the Taxonomy Regulation. By virtue of Article 4 of said simplifying regulation, the Bank has decided to apply the Taxonomy Regulation in the version applicable as at 31 December 2025.

Where appropriate, the Sustainability Report will contain information related to the upstream and downstream value chain. Specifically, for the topical ESRS, details are given of policies and actions related to suppliers and consumers or end-users. Both ESRS E1 related to Climate Change, which provides disclosure of the decarbonisation pathways of the financed portfolio, and ESRS S4 related to Consumers and End-Users, which sets out information related to customers, are related to the above-mentioned value chain. Similarly, ESRS G1 related to Business Conduct contains information about the management of relationships with suppliers. In addition, where the reported information refers to a stage of the value chain, this will be specifically indicated.

Lastly, Annex [5.1 Initiatives and alliances](#) sets out other disclosure standards and alliances to which the Bank is adhered.



1.2 Double materiality analysis

Banco Sabadell Group is firmly committed to ensuring sustainability across all its dimensions and, as a financial institution, it is aware of the important role that it plays in its economic, social and environmental surroundings, fostering care for the environment, supporting social progress and upholding a model of good corporate governance, aligned with international best practice.

The Group, in keeping with its commitment, has been conducting materiality assessments of sustainability-related aspects, aligning with best practice in relation to sustainability and transparency. Specifically, in 2022, the double materiality approach was included for the first time, and the concept of impact included in the 2021 review of GRI standards was introduced.

In line with this development and with the entry into force of the new European Corporate Sustainability Reporting Directive (CSRD), a double materiality exercise has been carried out in order to identify the material impacts, risks and opportunities related to sustainability. To that end, the guidelines set out in the European Sustainability Reporting Standards (ESRS) created by the European Financial Reporting Advisory Group (EFRAG) and adopted by the European Commission have been taken into account. This analysis, as established in the aforesaid standards, serves as a basis for determining the Institution’s material topics and, consequently, those that should be included in the Group’s Sustainability Report. Under the double materiality approach, this exercise includes assessing the effect of different sustainability topics from two points of view:

Impact materiality

Referring to the Bank’s effects on the environment and society through its activities, both directly and indirectly.

Financial materiality

Referring to the effects of the environment and society on the Bank’s financial position.

Results of the double materiality analysis

The table below shows the results of the double materiality analysis, indicating the sustainability topics analysed (ESRS) with their relative weight or importance in terms of materiality.

ESRS	Impact materiality	Financial materiality		Double materiality
	Impact	Risk	Opportunity	Result
ESRS E1 - Climate change				
ESRS E2 - Pollution				
ESRS E3 - Water and marine resources				
ESRS E4 - Biodiversity and ecosystems				
ESRS E5 - Circular economy				
ESRS S1 - Own workforce				
ESRS S2 - Workers in the value chain				
ESRS S3 - Affected communities				
ESRS S4 - Consumers and end-users				
ESRS G1 - Business conduct				
Tax responsibility ¹				

Scale

Very significant

Significant

Material

Non-material



¹ Entity-specific sustainability matter not covered by any of the topical ESRS.

As a result of the double materiality exercise, the following material Impacts, Risks and Opportunities (IROs) have been identified:

Sustainability topic	Sub-topic	Material impacts	Value chain	Nature and time horizon
Climate change	Climate change mitigation	Reduction of the effects of climate change through the provision of finance for projects that promote the reduction of greenhouse gas emissions and/or the capture of CO ₂ .	Downstream	Actual Positive
		Granting of finance to companies involved in GHG emissions-intensive industries and which have no plans to transition to a sustainable economy, which contributes to global warming.	Own operations	Actual Positive
		Contribution to the mitigation of the effects of climate change through digital management of services, such as encouraging the use of digital channels in order to avoid customers having to travel to branches, promoting teleworking by employees, and optimising the transportation of office materials (e.g. paper, plastic).	Own operations	Actual Positive
	Climate change adaptation	Contribution to reducing global warming due to the Institution's goal to have carbon-neutral operations.	Own operations/ Downstream	Actual Positive
	Energy	Contribution to a more sustainable economy by consuming electricity from renewable sources.	Own operations	Actual Positive
Own workforce	Equal treatment and opportunities for all	Existence of a pay gap due to insufficient development of initiatives to promote gender equality.	Own operations	Potential Negative / Short term
		Integration of different groups through a diverse workforce achieved by defining and implementing specific initiatives.	Own operations	Actual Positive
		Improvement in the quality of life of the workforce thanks to the implementation of fair working hours, a safe work environment and the development of work-life balance policies.	Own operations	Actual Positive
	Working conditions	Professional development of the workforce thanks to the implementation of a training plan.	Own operations	Actual Positive
		Establishment of competitive salaries for people in the organisation.	Own operations	Actual Positive
Consumers and end-users	Social inclusion of consumers and end-users	Improvements in the economic, social and cultural rights of communities by offering finance so that they may access housing.	Downstream	Actual Positive
		Contribution to a robust business fabric, by offering finance to startups and SMEs in the geographies in which the Bank operates.	Downstream	Actual Positive
		Access for vulnerable groups in society to basic financial services, fostering equality and reducing the economic divide.	Downstream	Actual Positive
		Potential negative impact on the finances of vulnerable groups due to their over-indebtedness, as a result of taking out certain financial products that are not suited to their profiles.	Downstream	Potential Negative / Short term
		Access to financial resources through financial education programmes to help people manage their finances, set up small businesses and improve their living conditions.	Downstream	Actual Positive
Business conduct	Ethics, integrity and good corporate governance	Improved levels of customer trust thanks to the Bank's ethical and transparent conduct.	Own operations	Actual Positive
		Contribution to the stability of the financial system, by exercising good corporate governance, taking ethical actions that benefit society and other players.	Own operations	Actual Positive
		Improved levels of confidence among investors, shareholders and the market in general, due to transparent disclosure of the Institution's financial and non-financial information.	Own operations	Actual Positive
Tax responsibility		Tax contribution to the economic development and sustainable growth of all jurisdictions in which the Group operates, adjusting the fiscal approach accordingly, continuously promoting responsible and transparent tax management, in accordance with the concerns and requirements of its customers, shareholders, tax authorities and other stakeholder groups.	Own operations	Actual Positive

Sustainability topic	Sub-topic	Material risks and opportunities	Value chain	Relevant time horizon
Climate change	Climate change adaptation / Climate change mitigation	Opportunity to build customer loyalty by offering advisory services for the climate transition.	Downstream	ST/MT/LT
		Opportunity to improve the position in the market by offering sustainable finance solutions (green & social loans and sustainability-linked loans).	Downstream	ST/MT/LT
		Credit risk for the Institution caused by physical climate risks affecting its customers, ultimately reducing their creditworthiness.	Downstream	MT/LT
		Risk of a loss of business and higher costs for customers who fail to transition.	Downstream	ST/MT/LT
Consumers and end-users	Customer satisfaction	Opportunity to increase turnover by cross-selling financial products.	Downstream	ST/MT/LT
	Social inclusion of consumers and end-users	Risk of increased costs to adapt solutions for vulnerable groups.	Downstream	MT/LT
	Information-related impacts for consumers and/or end-users	Risk of higher costs and investments in cybersecurity to tackle increasingly sophisticated attacks.	Own operations	MT/LT
		Opportunity to increase income by attracting new customers through digital channels.	Own operations	MT/LT
		Risk of digital fraud for the Bank.	Own operations	MT/LT

Following the analysis, Banco Sabadell concluded that the current risks identified in the double materiality analysis (which include the risk of digital fraud, higher costs to adapt solutions to vulnerable groups and credit risk caused by climate-related physical risks to which customers are exposed and which reduce their creditworthiness) currently produce no significant effects.

This conclusion was reached after evaluating the impact that they currently have on the Bank's financial statements, such as the income statement and the balance sheet, having verified that they have no material significance. Assuming that these impacts may be following a growing trend, risks are being managed in order to minimise the potential extent of those impacts in the future.

In relation to current opportunities, including those related to a wider range of sustainable finance solutions and improved advice for the climate transition, as well as those related to the attraction of new customers through digital channels and increased cross-selling, it was concluded that they have material significance and the Institution is working to benefit from them and to continue developing the sustainable solutions that it offers to its customers.

The Group promotes sustainable financing and investment to drive forward the transition towards a more sustainable model and a low-carbon economy, offering customers and investors the best possible solutions. The Bank committed to mobilise €65bn in sustainable finance between 2021 and 2025. The Bank mobilised over €76bn over the 2021-2025 period, surpassing the established target by more than 17%.

The way in which the Institution's strategy has embedded material topics for its stakeholder groups is described in detail in the sections included for that purpose in the material disclosures:

- **2.1 Climate change** describes the climate strategy in relation to finance for projects that promote the transition, the reduction and offsetting of the Institution's carbon footprint, support for the transition for GHG emissions-intensive sectors, and the management of physical and transition risks, among other topics.
- **3.1 Own workforce** describes the strategy in relation to managing the gender pay gap, staff development, workforce diversity, competitive salaries and the quality of life of employees.
- **3.2 Consumers and end-users** describes the strategy in relation to finance for housing, the contribution to a robust business fabric, the management of customer vulnerability, customer satisfaction, digitalisation and cybersecurity.
- **4.1 Business conduct** describes the strategy in relation to contributions to the stability of the financial system and the trust of investors and customers through ethical and transparent conduct.
- **4.3 Tax responsibility** describes the strategy in relation to the Bank's contribution to the development of the companies in which it operates.

Double materiality analysis evolution

During 2025, the double materiality analysis conducted in 2024 was updated. This update focused on reassessing certain impacts, risks and opportunities arising from changes in the public documents consulted to evaluate the opinions of stakeholder groups, with particular emphasis on sustainability reports published by "first-wave" entities subject to the CSRD.

Accordingly, although there are no changes compared to the master document published the year before, the Institution has decided to include as material impacts "Integration of different groups through a diverse workforce achieved by defining and implementing specific initiatives" and "Access to financial resources through financial education programmes to help people manage their finances, set up small businesses and improve their living conditions". Following the aforementioned update, the impacts have been incorporated into the materiality thresholds established by the Institution.

Methodology for the double materiality analysis

The methodological performance of the double materiality analysis carried out comprises four key phases:

- 1 Definition of the perimeter under analysis**
- 2 Identification and assessment of impact materiality**
- 3 Identification and assessment of financial materiality**
- 4 Definition of materiality thresholds**

Phase 1: Definition of the perimeter under analysis:

The aim of this first phase is to outline the double materiality analytical framework. This phase involved determining:

a. The key sustainability topics for the Institution:

To identify the possible material topics to be evaluated in the double materiality exercise, an analysis was carried out to identify those topics that are, in principle, more important for the Institution from an ESG perspective. The topics referred to in the ESRS were comprehensively analysed, in addition to the topics deemed to be material in previous materiality exercises and the Principles for Responsible Banking², among others.

Based on these priority topics, a process then took place to rule out or discard the less material topics, applying expert criteria, merging those with synergies between them and keeping those that were thought to have priority. To perform this discarding process, the following analyses were taken into consideration: (i) other regulatory references and questionnaires from ESG rating agencies, (ii) analyses of other stakeholder groups (internal information about the opinions of investors, customers and NGOs), and (iii) comparative analyses of the sector's ESG disclosures.

b. Stakeholder groups to be involved in the exercise and definition of channels to listen to what they have to say:

The Bank's main stakeholder groups were identified by reviewing previous exercises, analysing recommendations included in the CSRD, and examining peer group entities. The groups identified for the double materiality exercise were the following:

- Financial Community: investors, shareholders and rating agencies
- Employees: Banco Sabadell Group workforce
- Suppliers: main suppliers that might be more affected by ESG topics
- Customers: retail and business customers
- Bodies and Institutions: regulators of the domestic and European framework
- Society: citizens, communities and organised civil society
- Peers: comparable institutions in the sector

After identifying the stakeholder groups, channels to listen to what they had to say were determined. To that end, priority was given to direct contact and, where that was not possible, indirect contacts were made by

² Results obtained from the Portfolio Impact Analysis.

analysing the documentation related to the corresponding stakeholder group.

In the case of suppliers, employees, retail banking customers and business banking customers, surveys were conducted in order to ascertain their opinions about the topics under consideration. To determine the number of responses needed to be considered statistically significant, the smallest representative sample of each sample universe was calculated to estimate how many surveys needed to be sent, considering a confidence interval of 95%.

In the case of the group of Employees, their views have been analysed through questionnaires, which asked them about sustainability-related topics that directly affected them.

Furthermore, Customers (Banco Sabadell Group's retail and business customers) and Society (citizens, communities and organised civil society) are two stakeholder groups identified in the double materiality exercise carried out, whose opinions and interests were taken into account when carrying out the double materiality analysis. To do this, the group of Customers (both retail and business) has been analysed through questionnaires, which asked them about sustainability-related topics that directly concerned them. To determine the interests of Society, the Group's internal documentation, as well as reports and public documentation, has been analysed (notably the Sustainability Regulations, non-financial regulations, reports on global trends, ESG indices and ratings, and sector trends).

In the case of the Financial Community, Bodies and Institutions, Society, and Peers, the Group's internal documentation was used, as well as reports and public documents to complement the analysis.

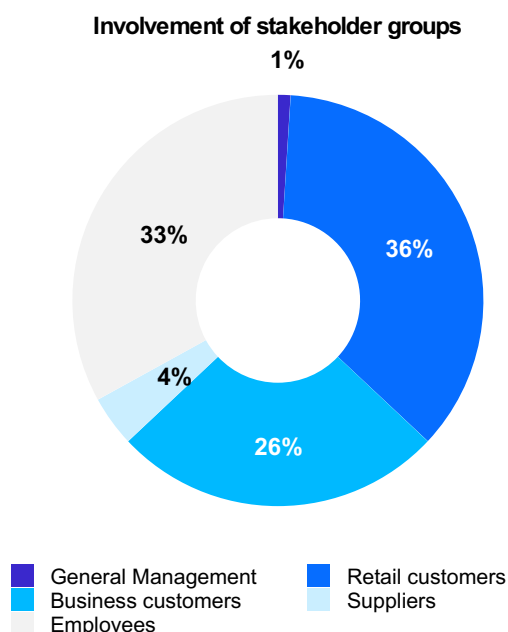
For the General Management stakeholder subgroup, a total of 20 interviews were held with managers from different areas and units of the Bank. It is worth noting that the managers considered in the sample came from a wide range of units, so most areas of the Bank were taken into consideration.

Phase 2: Identification and assessment of impact materiality

The double materiality analysis identified the main positive and negative impacts associated with each sustainability-related topic that the Bank has or could have on society and the environment.

Each of them were assessed according to their characteristics through the scale, scope, irremediable character and likelihood, the scale being the severity or benefit of the impacts on the environment and society, as well as the time horizon of potential negative impacts. In the case of a potential negative impact assessed as affecting human rights, severity prevails over likelihood.

During the assessment exercise carried out, 1,612 participants, broken down according to the chart below, were actively involved through *ad hoc* questionnaires and interviews with General Management:



The Bank's General Management has been involved in both the assessment of impact materiality (scale, irremediable character and likelihood, since the scope of the impact is set by means of an internal analysis) and of financial materiality (financial effects, likelihood and trend over time). On the other hand, retail customers, business customers, employees and suppliers took part in the impact materiality assessment through an analysis of the scale.

In that regard, 56 impacts were identified, which were assessed under the impact materiality perspective.

Phase 3: Identification and assessment of financial materiality

First, the main risks and opportunities of each sustainability-related topic that affects or could affect the Bank's financial statements were identified.

These risks and opportunities were assessed in the short, medium and long term through their financial effects and likelihood of occurrence.

This assessment identified 42 ESG risks and 21 ESG opportunities, which were assessed under the financial materiality perspective.

Phase 4: Definition of materiality thresholds and results

Finally, materiality thresholds were defined, understood as the value from which an IRO is deemed material. These thresholds were established on the basis of a chart analysis of the normal distribution of the results obtained in the assessments of impact materiality and financial materiality. The Impacts, Risks and Opportunities (IROs) that stand out from the entire sample have thus been identified. The IROs belonging to the group of scores that are above the rest are classified as “material impacts, risks and opportunities”.

Once the results of the impact materiality assessment for all IROs, scored on a scale from 0 to 5, have been extracted, they are arranged in descending order to identify the cut-off point that determines the impact materiality threshold. For impacts, the entire sample together with their respective scores was used to generate a normal distribution, from which those that stand out from the rest have been identified. The threshold was subsequently established at impacts scoring above 3.45 points. Applying this threshold, a total of 19 material impacts were identified, which are described in the subsection “Results of the double materiality analysis” of this chapter of the Sustainability Report.

In the same way, once the financial materiality results were obtained, the entire ensemble of risks and opportunities with their respective scores was used to generate a normal distribution for the sample, from which those that stand out were identified. The threshold was subsequently established at 2.10 points. Using the threshold of >2.10, a total of 4 material opportunities and 5 material risks have been obtained, which are described in the subsection “Results of the double materiality analysis” of this chapter of the Sustainability Report.

The decision to apply different thresholds for financial materiality and impact materiality is explained by the fact that the formulae applied in the impact materiality and financial materiality assessments are not equivalent. Evidence of this is that, when analysing the entire impact materiality sample, the normal distribution of impacts is 3.1, whereas impact materiality is 1.1. By setting two different thresholds, it is ensured that impacts are not overrepresented to the detriment of risks and opportunities.

Subsequently, the results of this exercise were verified through expert judgement. This review was carried out with the team responsible for the double materiality analysis and the Sustainability Report, as well as with the first-level managers responsible for each IRO. In this way, each Bank division comprehensively reviewed the results obtained for the IROs within their remit, evaluating their relevance, consistency and adequacy against the operational and strategic reality.

Internal control processes for the double materiality analysis

As indicated in subsection **1.3.5 Risk management and internal controls over sustainability reporting**, the Internal Controls over Sustainability Reporting (ICSR) have identified risks and designed controls over the new double materiality exercise in order to ensure that this exercise is carried out correctly and completely.

The Board of Directors delegates the supervisory function regarding the internal control systems to the Board Audit and Control Committee. At least once a year, the situation of the ICSR as a result of new applicable regulatory requirements is reported to the Board Audit and Control Committee and to the Sustainability Committee. In addition, every year at the end of the tax year, the result of the assessment of the controls and the conclusions derived from it are escalated to the Board Audit and Control Committee.

Governance of the double materiality analysis

The results of the double materiality analysis, as well as the process and methodology applied, were reported to the Sustainability Committee, the Management Committee and to the Board Audit and Control Committee of the Institution.



Disclosure requirements addressed in the Sustainability Report

Once the material topics for the Bank have been identified, the sustainability information that is to be disclosed in the annual Sustainability Report is compiled and organised. Based on these material topics and the structure of the ESRS, this report covers environmental information first, followed by information on social aspects to finally conclude with information related to governance.

Topical standard	Disclosure requirement
ESRS E1 - Climate change	ESRS 2 GOV-3: Integration of sustainability-related performance in incentive schemes
	E1-1: Transition plan for climate change mitigation
	ESRS 2 SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model
	ESRS 2 IRO-1: Description of the processes to identify and assess material climate-related impacts, risks and opportunities
	E1-2: Policies related to climate change mitigation and adaptation
	E1-3: Actions and resources in relation to climate change policies
	E1-4: Targets related to climate change mitigation and adaptation
	E1-5: Energy consumption and mix
	E1-6: Gross Scopes 1, 2, 3 and Total GHG emissions
	E1-7: GHG removals and GHG mitigation projects financed through carbon credits
	E1-8: Internal carbon pricing scheme
ESRS S1 - Own workforce	ESRS 2 SBM-2: Interests and views of stakeholders
	ESRS 2 SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model
	S1-1: Policies related to own workforce
	S1-2: Processes for engaging with own workers and workers' representatives about impacts
	S1-3: Processes to remediate negative impacts and channels for own workers to raise concerns
	S1-4: Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions
	S1-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities
	S1-6: Characteristics of the undertaking's employees
	S1-8: Collective bargaining coverage and social dialogue
	S1-10: Adequate wages
	S1-12: Persons with disabilities
	S1-13: Training and skills development
	S1-14: Health and safety metrics
	S1-15: Work-life balance metrics
	S1-16: Compensation metrics (pay gap and total compensation)
	S1-17: Incidents, complaints and severe human rights impacts

Topical standard	Disclosure requirement
ESRS S4 - Consumers and end-users	ESRS 2 SBM-2: Interests and views of stakeholders
	ESRS 2 SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model
	S4-1: Policies related to consumers and end-users
	S4-2: Processes for engaging with consumers and end-users about impacts
	S4-3: Processes to remediate negative impacts and channels for consumers and end-users to raise concerns
	S4-4: Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions
ESRS G1 - Business conduct	S4-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities
	ESRS GOV-1: The role of the administrative, management and supervisory bodies
	ESRS 2 IRO-1: Description of the processes to identify and assess material impacts, risks and opportunities
	G1-1: Corporate culture and business conduct policies and corporate culture
	G1-2: Management of relationships with suppliers
	G1-3: Prevention and detection of corruption and bribery
Entity-specific disclosures	G1-4: Confirmed incidents of corruption or bribery
	Tax responsibility

The sections of the Sustainability Report in which information regarding these disclosure requirements can be found are provided in Annex 5.6 Correlation table with the CSRD.



Assessment of environmental degradation, social and governance risks

In addition to climate risk, which comprises physical and transition risks that are material for the Institution, environmental degradation, social and governance risks are also assessed and monitored. The processes through which these risks are integrated in the Institution's risk management model are described below.

The Institution, through its own operations, does not cause any negative impacts worthy of mention in the areas of biodiversity, ecosystems or natural resources. Furthermore, its stock of physical assets, which includes, among others, corporate buildings, offices, other facilities and ATMs, is located in urban hubs, away from ecosystems and biodiversity-sensitive areas. The quantitative assessment of environmental risk materiality that the Institution carries out on a regular basis considers that banking activity has a "Low" impact on the various vectors (air, soil, biodiversity and water) and a very limited impact on waste. This analysis is based on the sector mapping tool of the United Nations Environment Programme Finance Initiative (UNEP FI), which quantifies the impact on the environment of a banking institution (according to its CNAE code) and which the Institution also uses to assess the Environmental Degradation Risk (EDR) of its loan book.

The lack of noteworthy impacts in these areas is reinforced by the Bank's Environmental Management System (EMS) certification in accordance with ISO 14001:2015, which includes annual audits describing and analysing the plan of initiatives or improvements in relation to the EMS and covering aspects such as environmental performance, energy performance, waste reduction, disposal of hazardous materials, etc.

Despite that, the Institution is indeed exposed to potential non-climate-related environmental risks through its suppliers that deliver goods and services to the Bank. These are players located in its upstream value chain. Therefore, and in order to identify, manage and, where appropriate, minimise these potential risks, the Institution has several policies and procedures in place, such as the Procurement Policy and the Supplier Code of Conduct. Together, these documents cover the entire supplier relationship process, from the prior assessment, accreditation and procurement phase through to service delivery and its management and oversight. Throughout this entire procurement, service outsourcing and supplier management process, the Group has included the sustainability principle in its outsourcing and procurement policies to ensure that suppliers apply the best ESG practices and to incentivise this conduct.

Moreover, the Institution carries out an assessment of the various environmental aspects with tools that provide relevant information to decide whether or not to engage certain suppliers, through questionnaires based on the “statement of responsibility” of the supplier, who declares their acceptance of various statements in relation to each aspect. By way of example and for illustrative purposes only:

- General ESG: whether the supplier has an EMS or a publicly disclosed environmental policy, whether it has received complaints of an environmental nature, whether it identifies and manages ESG aspects and risks, whether it adheres to various environmental initiatives or commitments, whether it prepares an annual and public sustainability/CSR report, whether it has a sustainable procurement policy and if this policy is applied to its value chain, etc.
- Biodiversity and climate: whether it promotes actions that minimise the impact on biodiversity, whether it identifies and assesses climate risks, whether it complies with legal requirements on environmental matters, etc.
- Waste and circularity: whether it quantifies its waste and has improvement objectives, whether it has a circularity strategy for its activities, whether it integrates circularity criteria in its decisions or whether it takes actions to reduce the use of materials in the manufacturing of its products and services (metals, minerals, plastics, etc.).
- Water resources: whether it calculates a water footprint indicator in its production process and carries out regular monitoring of water consumption, whether it has targets for reducing water consumption, whether it carries out a water risk assessment, etc.

This analysis is carried out for various types of suppliers (essential outsourcing, non-essential outsourcing and critical outsourcing). Afterwards, they must satisfactorily complete the accreditation process and undergo continuous monitoring by the Institution to ensure compliance with their contract.

Thus, the Institution focuses its attention on the sustainability and environmental resilience of its suppliers and has established a dual objective to prevent and adequately manage environmental risk and to minimise possible negative effects (and amplify the positive ones) that these suppliers may generate. These objectives are, on one hand, for 80% of its relevant suppliers to have an ESG score and, on the other hand, for 90% of billing with these suppliers to be with those that have the highest scores (A+, A or B). Both objectives have been successfully met in 2025.

Environmental degradation risk of the loan book

The Bank conducts an assessment of its exposure³ to the risk associated with environmental degradation of the business risk portfolio, based on the United Nations Environment Programme Finance Initiative (UNEP FI) methodology.

³ Exposure means the amount drawn down and contingent risks in the business loan book.

This methodology assigns an environmental impact to each CNAE code, obtained by consolidating these five non-climate-related environmental factors:

1. Management of water resources: risk of water resources becoming contaminated, and their management.
2. Impact on biodiversity: negative effects on species and natural spaces.
3. Pollution and use of land: risk of land becoming contaminated or degraded, as well as the use associated therewith.
4. Air quality: risk of air being polluted with gases other than greenhouse gases, which could potentially affect ecosystems and people's health.
5. Management of resources and waste: generation of waste (hazardous or otherwise) in large quantities and with intensive use of natural resources.

It is worth noting that an exhaustive review of the environmental degradation risk associated with each CNAE code has been carried out, to obtain more granular data for each activity and to standardise the risk of certain similar activities (e.g. manufacturing activities, transport activities, etc.).

The overall environmental degradation risk score consolidates the risk associated with each of these factors. It is worth noting that, at present, environmental degradation risk (as well as the five factors) is not broken down by drivers (transition and physical). In this way, the impacts on the business portfolio are classified in four risk categories: "Low", "Medium", "High" or "Very High".

Overall, 1.3% of the business exposure is classified as having "Very High" environmental degradation risk and 10.1% as "High" risk⁴; the portfolio classified as having "High" and "Very High" risk remained stable compared to 2024. At a sectoral level, environmental degradation risk is concentrated in certain sectors, such as Electricity and gas, Transport, Food and beverages, Chemical, and Paper and timber.

Lastly, to ensure that the measurement of the evolution of these risks is supervised, the portfolio's exposure to climate-related and environmental risk is monitored on a quarterly basis and reported to the Bank's Sustainability Committee⁵.

Biodiversity risk

Biodiversity risk, as a subcategory of environmental degradation risk, affects the financial sector in a similar way as climate risk does, as both have associated ecosystem services that can be translated as an economic value for society. The potential deterioration of these services could affect the economy's production capacity.

Banco Sabadell's regulatory framework includes different guidelines for the protection of biodiversity. At the top level of this framework is the Group's Sustainability Policy, which includes the main guidelines for social, environmental and governance actions. This document sets out the principle of 'environmental protection', which includes the management of biodiversity.

⁴ Part of the portfolio could in turn also be affected by climate-related transition risk, therefore the percentages of each one cannot be added together directly.

⁵ Details of the attributions of management bodies in climate-related matters are provided in chapter [1.3.1 Sustainability governance](#).

The Bank defined the Environmental and Social Risk Framework, which also lays down measures to protect biodiversity, either through restrictions of certain activities or through general restrictions.

Based on this policy principle, the Bank defined the Environmental and Social Risk Framework, which also lays down measures to protect biodiversity, either through restrictions of certain activities or through general restrictions.

As the management of climate change and the management of biodiversity are intricately linked, most of these restrictions help to mitigate both risks. However, there are certain exclusions where the Bank has established that it will not take credit risk if it finds sufficient evidence that one or more of the following circumstances associated with biodiversity exist:

General exclusions:

- Companies that pose a threat to UNESCO World Heritage Sites, to any of the wetlands included in the Ramsar list, locations appearing on the map of the Alliance for Zero Extinction, and Category I-IV areas of the International Union for Conservation of Nature.
- Companies for which Banco Sabadell has sufficient reasons to believe that they are in material breach of applicable laws and regulations in relation to human rights and the environment, even if the circumstances in question do not constitute a breach of the local legislation of each country.

Sector-specific exclusions:

- Farms involved in controversies related to the production or trade of products regulated by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).
- Farming projects that involve the burning of natural ecosystems in order to clear land for agricultural activities.
- Farming projects that involve the destruction of High Conservation Value Forests.
- Vessels operating with drift nets of more than 2.5 km in USA or EU waters, or those which use drift nets to capture any of the species listed in Annex VIII of EU Regulation (EC) No 1239/98 or those listed in the Mexican National Fishing Charter and Official Standard NOM059-SEMARNAT-2010.
- Bottom trawling in USA or EU waters more than 800 metres below sea level.
- Mountain Top Removal (MTR⁶) mining methods.
- Mines that fail to produce evidence of a closure and site recovery plan.
- Mines with tailing dams that are not managed according to the best practices of the industry.
- Mining projects that involve the discharge of tailings into river systems or shallow waters.
- Desalination plants that lack adequate measures to mitigate the impact of the disposal of brine and/or the extraction of seawater.

In addition to establishing restrictions on activities with a high impact on biodiversity, the Bank monitors the impact generated by activities of companies included in its loan book. Although these are companies that fulfil the Environmental and Social Risk Framework, due to their activity they could inherently have an impact on biodiversity. This aspect is considered from two points of view:

⁶ On an exceptional basis, the Institution may grant them finance where they are located in countries with high energy dependence (more than 65% of imported energy) on coal or where they have no other viable alternative energy sources.

1. The quarterly monitoring of environmental degradation risk: this risk includes biodiversity risk, where it is clear that the sectors to which the Bank has exposure and which have the greatest impact are Electricity, Road transportation, Agriculture and fishing, Oil and gas, and Shipping.
2. The classification of borrowers according to the climate-related and environmental risk indicator (hereinafter, IRCA, by its Spanish acronym) (see section Climate-related and environmental performance of the loan book under [2.1.2 Managing and monitoring the risks associated with climate change](#)). Companies with “High” or “Very High” environmental degradation risk, which includes biodiversity risk, are given a worse rating.

Social risk

The Institution attaches great importance to the assessment of social and/or governance risks of its counterparties. Social risk takes into account various social factors such as those related to rights, wellbeing, and the interests of people and communities. The risk of loss arising from any negative financial impact on counterparties stemming from the current or prospective impacts of social factors is also included.

To that end, a series of actions linked to the process for identifying, measuring and managing social risk for both retail and business customers have been implemented. Although it is true that many of these actions apply to both types of customers, the Due Diligence Policy as regards the granting of loans is geared towards retail customers, while the Defence Sector Policy, the Eligibility Guide and the IRCA are actions mostly aimed at corporates.

Additional aspects assessed as part of the social risk of counterparties:

In addition to the Environmental and Social Risk Framework itself, the Institution has strengthened the process for capturing, identifying and reporting the social risk of counterparties. This process is mainly executed at two different levels:

1. The advanced IRCA has a specific module enabled to capture KRIs⁷ or quantitative social indicators of counterparties. This makes it possible to capture aspects linked to respect for human rights, quality employment, equality, fair and equitable compensation, talent management, occupational safety, supplier or customer management, among others.
2. During risk acceptance, Corporate Banking operations with a Group Risk Operations Committee (ROC) level of autonomy require an ESG Annex that includes the assessment of potential relevant disputes and controversies of the counterparty in relation to social aspects. To that end, potential significant disputes and controversies associated with aspects such as human rights, labour and minority rights, diversity and equality, among others, are assessed.

Lastly, to ensure that the measurement of the evolution of social risks is supervised, the above-mentioned quantitative indicators are monitored on a quarterly basis and reported to the Bank's Sustainability Committee⁸.

⁷ Key Risk Indicators.

⁸ Details of the attributions of management bodies in relation to climate-related matters are provided in subsection [1.3 Governance](#).

Governance risk

The Institution considers different governance factors of counterparties, such as those related to the management and operation of a company, for example, anti-bribery and anti-corruption practices and compliance with relevant laws and regulations. The risk of loss arising from any negative financial impact on counterparties stemming from the current or prospective impacts of governance factors is also included. Actions in relation to this risk focus on business risk.

Additional aspects assessed as part of the governance risk of counterparties:

In addition to the Environmental and Social Risk Framework itself, the Institution has strengthened the process for capturing, identifying and reporting the governance risk of counterparties. This process is mainly executed at two different levels, similar to the approach taken for social risk:

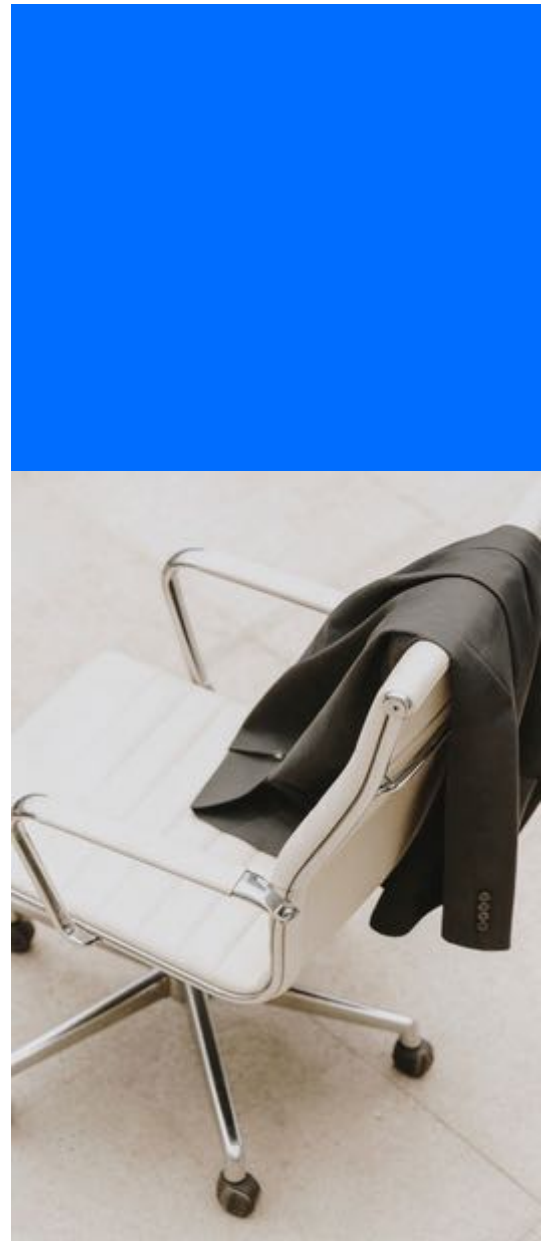
1. The advanced IRCA has a specific module enabled to capture KRIs or quantitative governance indicators of counterparties. This makes it possible to capture aspects related to the composition of the Board of Directors and the existence of policies on conflict of interests, the whistleblowing channel, tax responsibility, contributions to foundations, among others.
2. During risk acceptance, operations with a Group ROC level of autonomy require an ESG Annex that includes the assessment of potential relevant disputes and controversies of the counterparty in relation to governance aspects. To that end, potential significant disputes and controversies associated with aspects such as their structure, corporate governance, culture, business ethics, fight against corruption, conflicts of interest, breaches of laws, inclusiveness, among others.

Lastly, to ensure that the measurement of the evolution of governance risks is supervised, the above-mentioned quantitative indicators are monitored on a quarterly basis and reported to the Bank's Sustainability Committee.

Environmental and Social Risk Framework

As mentioned above in biodiversity risk, this Framework consolidates the set of applicable criteria (sectoral rules) that are intended to limit the financing of customers or projects that the Institution considers to be contrary to the transition to a sustainable economy or that lack alignment with international regulations or best practices in the industry.

The Framework also integrates compliance with the rules and standards at the level of social risk, some sector-specific (e.g. in the energy and agricultural sectors, special consideration is given to the negative impact they may have on society and local communities), and others of general application, such as the International Labour Organization (ILO) Conventions and the UN Guiding Principles on Business and Human Rights. In this regard, the Framework has the same thresholds and scopes of application and the same mechanisms for effective implementation described above, including the dispute screening tool of a reputable third-party supplier. Specifically, the general exclusions limiting the financing of companies with a high level of social risk, regardless of the sector to which the borrower belongs, are:



- Companies for which Banco Sabadell has sufficient reason to believe that they employ child labour or forced labour, as defined in the ILO conventions, or that have participated in human rights violations and/or that do not follow the principles of our human rights policy.
- Companies involved in the resettlement of indigenous or vulnerable groups without their free, prior and informed consent, or that otherwise infringe the rights of those groups.
- Companies for which Banco Sabadell has sufficient reasons to believe that they are in material breach of applicable laws and regulations in relation to human rights and the environment, even if the circumstances in question do not constitute a breach of the local legislation of each country.
- Companies that do not have health and safety policies in place to protect their workers, such as OHSAS 18001 or ISO 45001.

The other aspects, beyond social risk, assessed as part of the framework and details of their application and integration in policies are described in subsection **2.1. Climate change**.

Specific qualitative analysis of the financial materiality of environmental risks

The Institution views environmental risk as a risk of a cross-cutting nature, which may affect the Institution as another risk factor on top of traditional banking risks.

Environmental risk can produce negative impacts through two types of risk drivers: physical risks and transition risks.

- Physical risks are those produced by the physical effects of climate change (resulting from adverse climate-related and geological events or changes in weather patterns) and by environmental degradation (consequence of changes in, and severe effects on, the balance of ecosystems); they are classified as either acute risks or chronic risks.
- Transition risks are those that occur due to the uncertainty associated with the timing and speed of the process of adjusting to an environmentally sustainable and resilient economy. This process can be affected by four risk drivers broken down into regulatory, technological, market and reputational, according to the classification of the Task Force on Climate-related Financial Disclosures (TCFD) and of the Corporate Sustainability Reporting Directive (CSRD).

The qualitative analysis covers the risks directly affected by environmental risk, namely, credit risk, market risk, liquidity risk and operational risk, as it is thought that in other risks (such as reputational risk and business model risk), the effect is indirect as it stems from the impact and management of the four risks mentioned.

In terms of the annual qualitative analysis of the materiality of impacts stemming from environmental risk, the exercise starts off with a “climate-related and environmental overview” that includes recent developments and the main trends observed over the past year and which can be consolidated or further explored or have the potential to impact the Institution now or in the future. In keeping with that overview, a qualitative assessment is made of the impact of physical and transition risks, as well as environmental degradation risks, on both customers/ counterparties and on the Bank, based on an impact intensity scale that goes from none to high and taking into account different time horizons. These time horizons (short term: <5 years; medium term: 5-10 years; long term: >10 years) are based on the ESG risk management guidelines published by the European Banking Authority (EBA) in January 2025.

From the perspective of physical risk, the analysis of the “climate-related and environmental overview” concludes that in 2025 acute climate events continued to occur and chronic climate trends continued to get

worse (e.g. cold snaps, heatwaves, storms, flooding, fires, etc.), in keeping with previous years. Emissions remain at record highs and climate action continues to be inadequate, foreshadowing increasing prospective impacts stemming from climate-related physical risks and further ecosystem deterioration, including rising economic losses, additional adverse effects (e.g. health-related) and insufficient investment in climate adaptation.

The trends analysed point to transition risks in the United States being notably milder than in 2023/24, stemming from the Trump administration's publicly stated opposition to ESG matters and the activation of multiple levers to revert or roll back the green agenda, amid an environment of increasing attention on geopolitical risk drivers. This contrasts with the approach taken by the European Union, which continues to place decarbonisation among its strategic priorities, including through the publication in February 2025 of the Clean Industrial Deal, reaffirming its commitment to climate targets and setting out economic priorities and incentives. It also established decarbonisation targets for 2040, adopted at the end of the year, which are consistent with the objective of net-zero emissions by 2050. However, throughout 2025, EU institutions also scaled back climate ambitions in other areas in order to safeguard the international competitiveness of the European economy, such as the Carbon Border Adjustment Mechanism (CBAM), the Emissions Trading System (EU ETS) and regulations relating to deforestation, pesticides and ocean protection.

The results of the qualitative analysis showed that, in terms of inherent risk, the risk with the biggest effect continued to be credit risk (see tables).

In terms of physical risks, as events are expected to become more frequent and severe, it is thought that this will increase the impact intensity of credit risk over the time horizon considered, with acute risks materialising abruptly and chronic risks emerging gradually. In terms of transition risks, these are estimated to have a gradually increasing overall impact on counterparties (customers), affecting them to a greater or lesser extent depending on their activity sector and the efforts made to decarbonise, driven primarily by policy & legal and technology drivers.

On the other hand, for the other risks analysed (market, liquidity and operational), the impact intensity of inherent environmental risks is low.

In the case of market risk, investors are not yet clearly pricing these types of risk drivers into the prices of financial assets (particularly sovereign debt, where the Bank has most of its market risk), nor have they yet changed their general requirements to require issuers to submit plans for their transition that show their trajectory towards a decarbonised economy.

In terms of liquidity risk, the limited impact reflects the expectation that any inherent risk among the Bank's customers will be isolated or localised in specific sectors and locations, given its diversified customer base and adequate capital buffers.

As for operational risk, extreme weather events are expected to have localised and uneven impacts across the territory, while new regulations on sustainable financial products remain under development and implementation.

Physical risks materiality matrix

	Short term	Medium term	Long term
Acute Physical Risk			
Credit			
Market			
Liquidity			
Operational			
Chronic Physical Risk			
Credit			
Market			
Liquidity			
Operational			

Transition risks materiality matrix

	Short term	Medium term	Long term
Policy & Legal Transition Risk			
Credit			
Market			
Liquidity			
Operational			
Technology Transition Risk			
Credit			
Market			
Liquidity			
Operational			
Market Transition Risk			
Credit			
Market			
Liquidity			
Operational			
Reputational Transition Risk			
Credit			
Market			
Liquidity			
Operational			

Environmental degradation risk materiality matrix

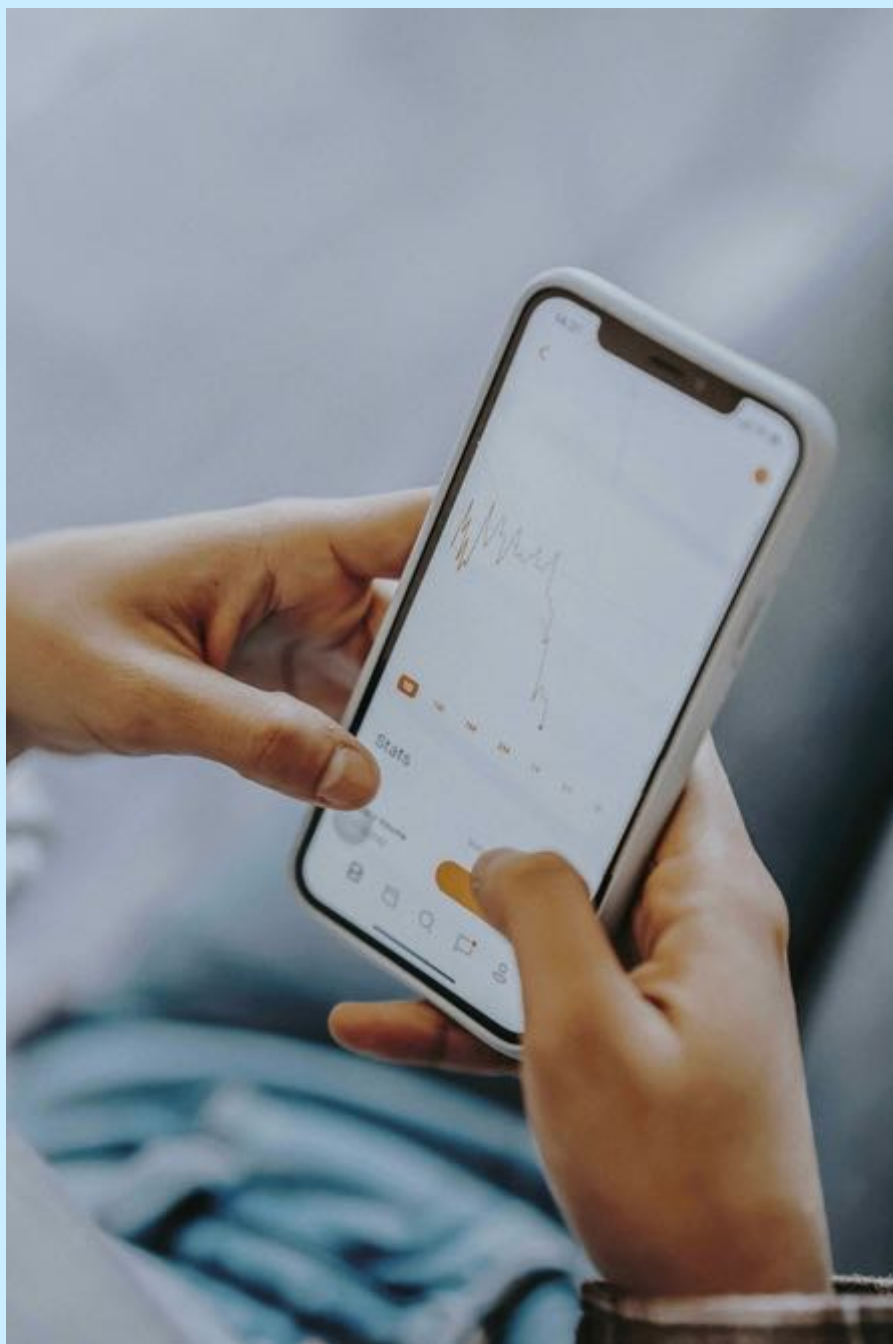
	Short term	Medium term	Long term
Environmental degradation risk			
Credit			
Market			
Liquidity			
Operational			

Short term: 1-5 years		Medium term: 5-10 years		Long term: >10 years	
No impact	Low	Medium-Low	Medium	Medium-High	High

Note: The qualitative materiality assessment of environmental risk considers an impact in different impact categories ("No impact", "Low", "Medium-Low", "Medium", "Medium-High" and "High"). In the case of physical risks, this range of impacts varies according to the intensity and frequency of the climate-related and environmental events that could materialise, as well as the capacity to neutralise any disruptions or adverse impacts that emerge. In the case of transition risks, the scale of impact varies according to the level of investment made in climate change mitigation, climate change adaptation and environmental degradation.

These are the results of an inherent risk assessment, without considering the application of the mitigating factors that the Institution has in place or which are in the process of being implemented under the Sustainable Finance Plan (SFP). Credit risk mitigating factors notably include ESG regulations governing risk granting, the profiling of sectoral decarbonisation pathways, counterparty IRCA assessments, the monitoring of risk and exposure indicators, and the existence of different forms of insurance.

After considering the rollout of mitigating factors, the residual environmental risk is concluded to be low for all of the risks under analysis.





1.3 Governance

1.3.1. Sustainability governance

The role of the administrative,
management and supervisory bodies

**The governance system and the organisation
of the different decision-making levels are both being
continuously improved and adapted to the needs that are
emerging from the new sustainability environment.**

Board of Directors

With the exception of matters reserved to shareholders at the Annual General Meeting, Banco Sabadell's Board of Directors is the most senior decision-making body of the company and its consolidated Group as it is responsible, by law and pursuant to the Articles of Association, for the management and representation of the Bank. The Board of Directors acts mainly as an instrument of supervision and control, delegating the management of the Institution's ordinary business matters to the Chief Executive Officer.

The Board of Directors is subject to well-defined and transparent rules of governance, in particular to the Articles of Association and the Regulation of the Board of Directors, and it conforms to best practice in the area of corporate governance. To ensure better and more diligent performance of its general supervisory duties, the Board is directly responsible for approving the Institution's general strategies. It also approves its policies and is therefore responsible for establishing principles, commitments and objectives in the area of sustainability, and for including them in the Institution's strategy.

As at 31 December 2025, the Board of Directors is made up of fourteen members. Of these, two are Executive Directors (14.28% of the total Board) and twelve are Non-Executive Directors, ten of them Independent Directors (71.42% of the total Board) and two Other External Directors (14.28% of the total Board). There is no trade union representation on the Board.

As at 2025 year-end, there were six female directors, including five female Independent Directors out of a total of ten Independent Directors and one female Other External Director. As of 2024, women represented 40% of the full Board of Directors, which comprised 15 members. Currently, the Board is made up of 14 members, and female representation has increased to 43%, thereby bringing forward the fulfilment of the Bank's commitment stated in *Sabadell's Commitment to Sustainability* and achieving early compliance with the provisions of Organic Law 2/2024 of 1 August on equal representation and balanced presence of women and men. This level of representation remained unchanged in 2025.

The matrix of competences and diversity of members of the Board of Directors set out below shows the horizontal and sectoral skills found in the Board of Directors.

Competencias sectoriales	Chair	Deputy Chair	Chief Executive Officer	Board Member
	Josep Oliu Creus	Pedro Fontana García	César González-Bueno Mayer	Aurora Catá Sala
	Ext. Dir.	Ind. Dir.	Exec. Dir	Ind. Dir.
Retail Banking	●	●	●	
Corporate Banking	●	●	●	●
Financial and capital markets	●	●	●	●
Insurance	●	●	●	
Other financial skills	●	●	●	●
Accounting and auditing	●	●	●	●
Risk management	●	●	●	
Planning and strategy	●	●	●	●
Governance	●	●	●	●
Risk control	●	●	●	
Anti-Money Laundering and Countering the Financing of Terrorism	●		●	
Legal	●		●	
Digital and ICT (digital transformation)	●		●	●
Human resources, culture, talent and remuneration	●		●	●
Responsible business and sustainability	●		●	
International experience:				
Spain	●	●	●	●
United Kingdom	●		●	
Mexico	●		●	
Other	●	●	●	
Horizontal skills				
Governing bodies	●	●	●	●
Organisational management and leadership	●	●	●	●
Business experience	●	●	●	●
Governance and public policy	●		●	
Consultancy			●	●
Regulatory and supervisory bodies	●		●	
Academic	●		●	
Communication and institutional relations	●		●	

Sectoral skills										
	Ana Colonques García-Planas	Lluís Deulofeu Fuguet	María José García-Beato	Mireya Giné Torrens	María Gloria Hernández García	George Donald Johnston III	Margarita Salvans Puigbò	Manuel Valls Morató	David Vegara Figueras	Pedro Viñolas Serra
	Ind. Dir.	Ind. Dir.	Ext. Dir.	Ind. Dir.	Ind. Dir.	Lead Ind. Dir.	Ind. Dir.	Ind. Dir.	Exec. Dir.	Ind. Dir.
Retail Banking	●	●	●		●	●	●			
Corporate Banking			●		●	●				●
Financial and capital markets	●		●	●	●	●	●		●	●
Insurance					●			●		
Other financial skills	●	●	●	●	●	●	●	●	●	●
Accounting and auditing	●		●	●	●		●	●	●	●
Risk management	●	●	●		●	●	●	●	●	●
Planning and strategy	●	●	●	●	●	●	●	●	●	●
Governance	●	●	●	●	●	●	●		●	●
Risk control	●	●	●		●	●	●	●	●	●
Anti-Money Laundering and Countering the Financing of Terrorism			●		●	●		●	●	●
Legal			●							
Digital and ICT (digital transformation)		●		●					●	
Human resources, culture, talent and remuneration	●	●	●	●		●	●		●	●
Responsible business and sustainability	●		●		●				●	●
International experience:										
Spain	●	●	●	●	●	●	●	●	●	●
United Kingdom			●			●			●	
Mexico					●				●	
Other		●	●	●	●	●	●		●	●
Horizontal skills										
Governing bodies	●	●	●	●	●	●	●	●	●	●
Organisational management and leadership	●	●	●	●	●	●	●	●	●	●
Business experience	●	●	●	●		●	●	●	●	●
Governance and public policy		●	●		●			●	●	
Consultancy		●		●			●		●	
Regulatory and supervisory bodies			●		●			●	●	
Academic			●	●				●	●	●
Communication and institutional relations		●	●		●				●	●

When defining the general strategy, the business objectives and the risk management framework of the Institution, the Board of Directors considers aspects related to sustainability, including climate-related, environmental, social and governance risks, and it also effectively oversees them.

In 2025, the Board of Directors revised the Group's Sustainability Policy, which integrates ESG criteria into business activities and the organisation, and strengthens Senior Management's involvement by linking ESG targets and objectives to variable remuneration. In addition, progress was made during the year in the measurement and management of climate-related, social and governance risks, including the development of internal models for double materiality.

In relation to the management and control of environmental risk, the Board is ultimately responsible for embedding it into the general strategy and for establishing the necessary mechanisms for its review. Its duties range from monitoring environmental risk to approving and reviewing the organisational and functional framework for managing, controlling and reporting on this risk, approving the associated policies and reviewing them on an annual basis. Lastly, it is worth noting that the Board of Directors has received specific training on climate risk management, the impact deriving from those risks, policies and regulations in that regard, as well as measurement metrics such as the carbon footprint and decarbonisation pathways.

Board Committees

Board Strategy and Sustainability Committee

The Board Strategy and Sustainability Committee was set up in 2021 and is chaired by the Chairman of the Board of Directors, in the capacity of Other External Director. It is formed of five directors: three Independent, one Other External and its Chair. This Board Committee met 14 times in 2025.

This Board Committee is responsible for analysing and reporting to the Board of Directors on environmental risk policies and for reporting to the Board of Directors on any amendments or periodic updates of the environmental risk strategy. It is also responsible for overseeing the model for identifying, controlling and managing risks and opportunities in relation to sustainability including, where appropriate, environmental risks.

Banco Sabadell continues to move forward with its activities and organisation to support and accelerate the important economic and social transformations that contribute to sustainable development and the fight against climate change.

The Board Strategy and Sustainability Committee carries out regular monitoring of the Institution's progress in ESG matters through the review of the Corporate Sustainability Report, which contains information about the overall ESG environment in the context of the macroeconomic and regulatory environment, and about the Institution's ESG outlook, the integration of ESG risks into management arrangements, and about the recognition the Bank has received for its disclosures and from rating agencies, among other aspects.

With regard to the above-mentioned regular monitoring of the Corporate Sustainability Report, the Board Committee was informed of the Institution's progress as a sustainable institution through, among other things, the Sustainability Indicator and compliance with the objectives set forth in Sabadell's Commitment to Sustainability. It was also kept abreast of key aspects relating to the Group's sustainable financed portfolio, ESG risk management and other ESG milestones, such as its inclusion among the world's 500 most sustainable companies

by *Time* magazine and its recognition by S&P Global as a leading bank in terms of ESG performance.

Lastly, the Board Committee issues and submits to the Board of Directors, on a monthly basis, all information concerning proposals, assessments, research and work carried out by the Board Committee in relation to matters within its sphere of competence discussed at its meetings each month.

On matters of strategy, the Chief Executive Officer takes part in the meetings, with rights to speak and vote, meaning that on such matters this Board Committee has six members.

With regard to sustainability, the Board Committee has the following duties:

- Analyse and inform the Board of Directors about the Institution's sustainability and environmental policies.
- Inform the Board of Directors of any modifications or regular updates of the sustainability strategy.
- Analyse the definition and, where applicable, amendment of policies on diversity and inclusion, human rights, equal opportunities and work-life balance and evaluate the level of compliance therewith on a regular basis.
- Review the Bank's social action strategy and its sponsorship and patronage plans.
- Review and report on the Sustainability Report prior to its review and reporting by the Board Audit and Control Committee and its subsequent sign-off by the Board of Directors.
- Receive information in connection with reports, documents or communications from external supervisory bodies within the scope of responsibility of this Board Committee.

Other Board Committees are involved to varying degrees in the sustainability governance arrangements:

Board Appointments and Corporate Governance Committee

In 2021, the Board Appointments and Corporate Governance Committee took on duties in relation to the disclosure of internal corporate policies and regulations, the oversight of rules on corporate governance, and the relationship with shareholders and investors, proxy advisers and other stakeholders. This Board Committee is formed of four Independent Directors and one Other External Director.

Board Audit and Control Committee

The Board Audit and Control Committee oversees the process to prepare and submit regulated financial and non-financial information and escalates recommendations or proposals intended to safeguard its integrity to the Board of Directors. It is also in charge of reporting to the Board of Directors, prior to publication, on the financial information and the Directors' Report, which include mandatory non-financial information that the Institution is required to disclose on a regular basis. Where necessary and in coordination with the Board Risk Committee, it oversees and assesses the effectiveness of internal policies and systems for the control and management of all risks, encompassing the Institution's financial and non-financial risks, including operational, ICT, social, environmental, policy and reputational risks or those related to corruption, and it provides oversight to ensure that the main direct or indirect risks are reasonably identified, measured and controlled. This Board Committee is formed of four Independent Directors, its Chair being an audit expert.

Board Risk Committee

The Board Risk Committee oversees the implementation of the Institution's Global Risk Framework Policy and is responsible for advising and supporting the Board of Directors with regard to the monitoring of the Bank's risk appetite and general risk strategy, taking into account all types of risks, to ensure that they are in line with the Institution's business strategy, objectives, corporate culture and values. This Board Committee is responsible for supervising and ensuring that all of the Group's risks are properly taken, controlled and managed, in accordance with the Group's Risk Appetite Statement, and for reporting to the Board of Directors on the performance of its duties. This Board Committee is formed of four Independent Directors.

Internal Committees

Management Committee

The Management Committee develops the Bank's strategic plan, making all necessary decisions for its fulfilment, including those related to sustainability, within the parameters set by the Board of Directors and the Board Strategy and Sustainability Committee. In addition, it regularly monitors the Institution's ESG Activities Plan and updates to the regulatory and supervisory framework; it also carries out a comprehensive review of the aforesaid plan and, if necessary, resolves any incidents.

Sustainability Committee

The Sustainability Committee, chaired by the General Manager and People & Sustainability Director, is the body in charge of establishing the Bank's Sustainability Programme and monitoring its execution, as well as defining and disclosing the general principles of action in the area of sustainability and promoting the development of projects and initiatives. It is made up of 11 members (ensuring the representation of several areas, including Sustainability, Risk, Finance, Business, Communication, Research Service and Regulation), covering all functional areas to ensure cross-cutting coordination in the implementation of the Sustainability Programme and, therefore, in the execution of the Institution's ESG strategy. It meets on a monthly basis (11 times during 2025).

Organisation

In January 2025, the Sustainability division merged with the People division, creating the People & Sustainability division. This is the area responsible for the definition and management of Banco Sabadell Group's responsible banking strategy, including the cross-cutting implementation of ESG criteria across all the Bank's business units, affiliates and subsidiaries. The People & Sustainability Director is a General Manager who forms part of the Institution's Management Committee and reports directly to the Chief Executive Officer.

The Sustainability division, which reports directly to the People & Sustainability Director, is a cross-cutting structure that has an overview of all new initiatives to be implemented in the Bank, collaborating in their definition, promoting them and taking charge of their monitoring.

As new sustainability functions are added and expanded, the Institution's structure is being adapted to include the necessary

knowledge and skills in all the divisions responsible for ESG matters. The Bank is organised according to the system of the three lines of defence, and each line has teams dedicated to sustainability-related matters.

With regard to the **first line of defence**, the business areas have been reinforced by setting up specific units that coordinate with the commercial teams to create sustainable financing solutions for customers, identifying trends and new social and environmental products and services. The Business Banking and Corporate Banking portfolio management teams have expanded their staff to ensure closer monitoring of sustainable transactions. In addition, the risk teams have been expanded to perform their own ESG functions in portfolio risk management.

Other teams have introduced new sustainability-related functions, such as the Financial division, where additional staff members now focus on building and analysing sustainability data. In this respect, the Sustainability division has developed in the area of strategy and the Purchasing division now includes supplier sustainability analysis for relevant procurement items.

In order to meet the growing regulatory and supervisory demands, the Research and Models teams have also been strengthened. These are the teams that add climate scenarios to the stress testing models and the Internal Capital Adequacy Assessment Process (ICAAP).

Similarly, new members have been added to the Compliance, Credit Risk Control, Internal Control and Models Validation teams to reinforce the **second line of defence** and guarantee the quality of 1LoD systems in relation to risk management and the governance of sustainability processes.

Teams of the **third line of defence** were also enlarged to take on audit functions related to governance processes, risk management activities and internal control in the area of sustainability.



Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

The material Impacts, Risks and Opportunities (hereinafter, IROs) have been identified using the double materiality analysis, which is explained in detail in section [1.2 Double materiality analysis](#).

In this respect, the material IROs have been grouped into a total of six topics: Climate change mitigation and adaptation, Energy, Own workforce, Access to products and services and non-discrimination, Cybersecurity and data protection, and Business conduct.

In this vein, the Management Committee is the highest-level executive committee and is regularly informed of material impacts, risks and opportunities at top-level committee meetings.

The governance process for each of the above-mentioned topics is described below:

1. Climate change mitigation and adaptation

All matters related to climate change (mitigation and adaptation) are regularly reviewed by the Sustainability Committee. The Management Committee, for its part, engages in regular monitoring of the ESG Activities Plan and updates to the regulatory framework.

In addition, the matters that concern customer lending are submitted to the relevant Business Committees of the Institution, while those that relate to the measurement of borrowers' climate-related and environmental risks are relayed to the Technical Risk Committee.

As for the Board Committees, in relation to that to which each topic refers:

- **Board Strategy and Sustainability Committee:** Carries out regular monitoring of the Institution's progress in ESG matters through the review of the Corporate Sustainability Report, which contains information about the overall ESG environment in the context of the macroeconomic and regulatory landscape, about the Institution's ESG outlook, the integration of ESG risks into management arrangements, and about the accolades received by the Bank for its disclosures and from rating agencies. With regard to the above-mentioned regular monitoring of the Corporate Sustainability Report, the Board Committee was informed of the Institution's progress as a sustainable institution through, among other things, the Sustainability Indicator and compliance with the objectives set forth in Sabadell's Commitment to Sustainability. It was also kept abreast of key aspects relating to the Group's sustainable financed portfolio, ESG risk management and other ESG milestones, such as its inclusion among the world's 500 most sustainable companies by *Time* magazine and its recognition by S&P Global as a leading bank in terms of ESG performance.
- **Board Risk Committee:** One of the main responsibilities of the Board Risk Committee is that of putting forward the proposed Risk Appetite Statement (RAS) to the Board of Directors for approval. It is

worth noting that, in relation to sustainability, new metrics and indicators relating to environmental risks associated with credit risk have been incorporated. Information on decarbonisation pathways for new portfolios has continued to be provided, with this data sent regularly to the Board Risk Committee.

- **Delegated Credit Committee:** Approves or reports favourably to the Board of Directors, as applicable, on decisions concerning credit risk acceptance, credit risk refinancing and restructuring, and sales of foreclosed assets, according to the assumptions and limits established by the Board of Directors, having reviewed risk limits granted to large groups on 210 occasions and assessed the approval of more than 103 transactions involving enterprises and public sector entities. The prior analysis conducted by the Board Committee of the companies within its remit takes sustainability indicators into account. In this respect, it reports on the company's classification and alignment with ESG guidelines through its compliance with those guidelines; its alignment with the sectoral pathway, as applicable; and its compliance with sectoral rules. It also reports on the company's ranking given by the climate-related and environmental risk indicator (IRCA). This indicator aims to objectively rank companies that are obliged to produce a Sustainability Report, based on their exposure to climate-related and environmental risks, and according to their maturity in terms of managing those risks.
- **Board Audit and Control Committee:** During the year, in accordance with the duties incumbent upon it, the Board Committee has monitored and analysed the sufficiency, clarity and integrity of all financial and related non-financial disclosures published by the Bank, corresponding to both the Bank and Banco Sabadell Group, prior to their presentation to the Board of Directors and their disclosure to the market and to supervisory bodies.
- **Board of Directors:** Responsible for approving the Institution's policies, for establishing principles, commitments and objectives in the area of sustainability, and for including them in the Institution's strategy.

When defining the general strategy, the business objectives and the risk management framework of the Institution, the Board of Directors considers environmental aspects, including climate-related and environmental risks, and it also effectively oversees them.

2. Energy

The level of compliance with the commitments under the ESG framework, which include, among others, those related to the Institution's energy efficiency, is reported to the Sustainability Committee on an annual basis. The Sustainability Committee oversees the Sustainability Programme and drives the development of projects and initiatives to ensure effective compliance with the commitments undertaken.

It also validates proposals for improvements to the energy efficiency of the Institution's facilities, while the corresponding budget is approved by the Management Committee.

3. Own workforce

The top-level committee of the People & Sustainability division is in charge of defining the strategy and making decisions that have an impact on all staff. It also submits proposals to the Institution's governing bodies on actions related to professional development, remuneration policies, and occupational welfare and work-life balance measures, always in accordance with applicable regulations and internal policies.

Banco Sabadell prioritises initiatives linked to reducing the gender pay gap and increasing the representation of women in management positions. In this regard, internal policies and procedures ensure that staff work in a workplace environment where fairness and equality are strategic elements that guide the business culture. The Bank rolls out initiatives to all units throughout the organisation to reduce and mitigate pay inequality between men and women and it is committed to progressively reducing differences in that respect in order to move forward with its aim of supporting the economic and social transformation of our environment.

The monitoring and control of gender representation and the gender pay gap is a priority for the People & Sustainability division and is regularly reviewed by the unit's top-level committee. The aim of this mechanism is to assess the level of compliance with corporate objectives and the degree of success of the measures that the Institution has in place in terms of diversity, equality and inclusion, focusing on aspects related to the gender pay gap and the representation of women. Additionally, the People & Sustainability division is in charge of conveying the outcome of relevant actions to the forums indicated below:

- **Board Committees (Board Remuneration Committee, Board Appointments and Corporate Governance Committee, Board Strategy and Sustainability Committee):** report on the main conclusions drawn from the analysis of the Bank's remuneration models and the action levers to reduce the gender pay gap, aimed primarily at increasing female representation in positions with a higher functional value. Furthermore, the composition of the senior management group and the monitoring of gender diversity objectives are presented to the Board Appointments and Corporate Governance Committee on an annual basis, showing how they compare to peers and complying with the current regulations related to gender equality and gender pay equity.
- **Management Committee:** this Committee validates, on an annual basis, compliance with the annual targets for female representation embedded in the sustainability indicator, which forms part of the Institution's corporate objectives.
- **Managerial Performance Evaluation Committee (MPEC) and Divisional Employee Appraisal Committee (DEAC):** this forum meets annually with the aim of deciding on changes to senior management staff, approving proposals for promotions to or demotions from that group, as well as verifying compliance with the gender diversity targets and the application of policies that seek to foster gender representation parity.
- **Equality Plan Monitoring and Assessment Committee:** assessment of the level of compliance and progress of actions and objectives set forth in the Equality Plan.
- **Core and Business Groups Promoting Diversity, Fairness and Equality:** created in 2022 with the aim of driving forward initiatives, assessing the monitoring of indicators and promoting a culture with a holistic approach to diversity across all levels of the organisation.
- **Equality Officer:** person responsible for ensuring equal treatment and equal opportunities within the organisation chart. The Equality Officer has specific training in this area and supervises the execution of actions set forth in the Equality Plan.



4. Access to products and services and non-discrimination

Before marketing a new product or service, an internal workflow ("Product Workflow") is followed, where the relevant areas of the Bank review the various aspects to ensure they conform to the established standards. The subsequent validation by the areas involved is ultimately ratified by a high-level committee, the Technical Product Committee.

Moreover, since 2015, **Sogeviso** (a subsidiary created and wholly owned by the Bank) has managed the housing problem arising from Sabadell customers' families being unable to keep up with payments. Its governing bodies are structured to encompass all aspects of the company's activities. To that end, it has the following committees: the Corporate Projects Committee, responsible for the design and implementation of operational transformation and company infrastructure initiatives; the Business Development Committee, in charge of defining strategic business development initiatives and reviewing contracts with third parties for approval; and the Management Committee, which addresses relevant matters concerning the day-to-day activities of the business areas. Furthermore, the Real Estate Management division holds weekly meetings with the Sogeviso units responsible for its area of oversight (Corporate Services division and Mediation & Social Impact division).

In addition, in 2024 Sogeviso started up a new business line, for non-Group customers, focused on integrated management of newly constructed affordable rental stock associated with public-private partnership models. As a result of this initiative, 1,763 properties in Lot III of the Madrid Autonomous Community's "*Plan Vive*", with an occupancy rate of 92.1% as at 31 December 2025, were fully managed during 2025. In addition, Sogeviso actively participated in several housing tenders organised in Madrid, Aragon and Andalusia.

Finally, in relation to the **Code of Good Practice** (*Código de Buenas Prácticas*, or CBP), whose main objective is to arrange for the viable restructuring of mortgage debt for primary residences and is aimed at persons in a vulnerable situation, aggregated information on customer applications to request access to the measures provided in the CBP is prepared on a monthly basis. Information regarding the treatment of customers who expressed interest in this service but who, for different reasons, were not granted access to CBP measures, is also included. This information is periodically sent to the Customer Conduct Risk Prevention team.

5. Cybersecurity and data protection

The Information Security function sends regular cybersecurity status reports to governing bodies, such as the Management Committee, the Board Strategy and Sustainability Committee and the Board of Directors, which are the bodies responsible for overseeing the Institution's cybersecurity, along with the Board Risk Committee, which oversees ICT risks.

In relation to Data Protection, a plan setting out the necessary measures to monitor and supervise compliance with the Personal Data Protection Policy is submitted to the Management Committee for approval on an annual basis. Every six months, a Supervision and Control Plan follow-up report is also sent to the Management Committee and to the Board Risk Committee.

In addition, the Annual Data Protection Report is compiled which, among other things, reports on monitoring of the Control Plan, and the Data Protection Officer's Report is issued, in compliance with the



obligation of accountability to the Bank's Senior Management. This report is submitted to the Management Committee, the Board Risk Committee and the Board of Directors.

6. Business conduct

The Corporate Ethics Committee (CEC), reporting to the Board of Directors, is ultimately responsible for adopting policies on corporate reputation and ethical behaviour. Its core mission is to promote the ethical behaviour of the entire organisation to ensure compliance with the action principles set out in the Banco Sabadell Group Code of Conduct, the Internal Code of Conduct relating to the securities market (*Reglamento Interno de Conducta*, or RIC), the Corporate Crime Prevention Policy, the General Policy on Conflicts of Interest, the Anti-Corruption Policy and the Policy on the Internal Reporting System and Protection of Reporting Persons.

1.3.2 Integration of sustainability-related performance in incentive schemes

Banco Sabadell Group's Remuneration Policy is consistent with the goals of the risk and business strategy, the corporate culture, the protection of shareholders, investors and customers, the values and long-term interests of the Group, as well as with customer satisfaction and the measures taken to prevent conflicts of interest without providing incentives for excessive risk-taking.

To that end, Banco Sabadell Group's Remuneration Policy is based on the following principles:

1. Promote business and social sustainability in the medium-long term and ensure alignment with Banco Sabadell Group's values. This involves:
 - Aligning remuneration with shareholders' interests and with the creation of long-term value.
 - Implementing rigorous risk management, considering measures to prevent conflicts of interest.
 - Aligning with Banco Sabadell Group's long-term business strategy, objectives, values and interests.
2. Ensure a competitive and fair remuneration system (external competitiveness and internal fairness) that:
 - Is able to attract and retain the best talent.
 - Rewards professional experience and responsibility, irrespective of the employee's gender. In this respect, Banco Sabadell Group's Remuneration Policy is based on equal pay for male and female employees for equal work or for work of equal value.
 - Is aligned with market standards and is flexible, so that it can be adapted to changes in the environment and sector requirements.

3. Reward performance, thereby aligning remuneration with individual performance and the level of risk taken:
 - Finding an adequate balance between the various remuneration components.
 - Considering current and future risks and performance, without providing incentives for excessive risk-taking beyond Banco Sabadell Group's tolerated threshold.
 - Implementing a simple, transparent and clear-cut remuneration scheme. The Group's Remuneration Policy should be easy to understand and easy to communicate to the entire workforce.

The Banco Sabadell Group Remuneration Policy, in its entirety, includes information about the integration of sustainability risks. In particular, in terms of sustainability, the following aspects are taken into consideration:

- The remuneration policy and practices shall encourage behaviour consistent with the Group's risk-based approaches related to climate and the environment, as well as with the commitments voluntarily undertaken by the Group. In addition, they shall promote a long-term approach to the management of climate-related and environmental risks.
- Remuneration components must contribute to the promotion of environmental, social and governance actions in order to make the business strategy sustainable and socially responsible.

The specific workings of variable remuneration will be set out in the Banco Sabadell Group companies' regulations. In any case, variable remuneration will be linked to performance, such that its total amount is based on an assessment that:

- Combines the overall performance of the Group, entity, business unit or division in which the employee performs their duties and/or the individual performance of the employee themselves.
- Takes into account both financial and non-financial criteria, aligned with the strategic planning, budget and risks taken or indicators in terms of the environment, society, diversity and gender equality.
- In terms of long-term remuneration, multi-year targets will also be considered, based on quantitative criteria linked to a period long enough to correctly capture the risk taken.



Within the Group's objectives, the Synthetic Sustainability Indicator (SSI) has a weight of 10% in employees' short-term variable remuneration and includes ESG metrics and indicators. In terms of its composition, it is structured in four blocks:

Parameter	Definition	Weight
Rating agencies	— Score on main ESG indices obtained from rating agencies (MSCI, Sustainalytics, DJSI, ISS)	20%
Sustainable Finance Plan	— Number of IRCA evaluations carried out — Delivery of the established decarbonisation pathways — Rollout of Accessibility Project — Compliance with main indicators in Sabadell's Commitment to Sustainability	20%
Diversity	— % Women in management	20%
Sustainable Business	— Green and Social Loans (GSLs) — Sustainability-Linked Loans (SLLs)	40%
Total		100%

Furthermore, to reinforce the alignment of remuneration with the Group's commitment to sustainability, in 2023 a synthetic sustainability indicator was included in the multi-year targets set by the Group, directly linked to long-term remuneration, weighted at 20%. Its composition is based on a synthetic indicator relating to sustainable business and diversity.

In long-term remuneration, in addition to the annual targets established for short-term variable remuneration, the multi-year targets must be met. For the period from 2025 to 2027, the multi-year target indicators are shareholder value creation (relative Total Shareholder Return or TSR), weighted at 40%; profitability (Return On Tangible Equity or ROTE), weighted at 40%; and Sustainability (the above-mentioned synthetic sustainability indicator), weighted at 20%.

In the case of the Executive Directors, the synthetic sustainability indicator is weighted at 14% for the CEO and 13% for the CRO.

Additionally, some job functions have been assigned sustainability targets as part of their individual targets.

Targets will be set in such a way that the allocation of variable remuneration considers all types of current and future risks; this shall apply to both annual and multi-year targets and to *ex-ante* adjustments to variable remuneration.

Banco Sabadell Group annual and multi-year targets, their weighting and their scale of achievement will be approved by the Board of Directors, based on a proposal by the Board Remuneration Committee. Guidelines on target setting and their weights for all staff members are approved by the Board Remuneration Committee.

1.3.3 Framework of policies, principles and declarations in the area of sustainability

Policy	Purpose	Content	Scope of application	Approval	Last update	Available online ⁹
Sustainability Policy	Integrate environmental, social and governance factors into decision-making, addressing the needs and concerns of all stakeholder groups and establishing the core principles that guide the Institution through sustainable development, prudence, transparency, safety, diversity, social commitment, environmental protection, respect for human rights and professional development, including commitments such as: — Climate change mitigation and adaptation, aligned with the business strategy, the risk appetite and the Group's processes and controls. — Energy efficiency and reduction of GHG emissions. — Promotion of financing and development of projects linked to renewable energy.	The Policy considers the impacts arising from the Group's activities from a double materiality perspective, promoting management systems aligned with international standards and a process of continuous improvement. The Bank has undertaken commitments to reduce its environmental footprint and advance the decarbonisation of its financed portfolio. In 2025, the Banco Sabadell Group Diversity Procedure was introduced in order to define implementation guidelines for diversity within the Institution's own workforce. It sets compliance standards and specifies the related principles outlined in the Sustainability Policy, from which it originates, as well as in the Banco Sabadell Group Human Rights Policy.	It covers the entire banking business perimeter, taking into account the Banco Sabadell brands that operate in Spain; TSB, which operates in the United Kingdom; and Banco Sabadell Mexico, which operates in Mexico.	Board of Directors	April 2025	Yes
Environmental and Social Risk Framework	Consolidate the set of applicable criteria that aim to restrict the financing of customers or projects that the Institution considers to be contrary to the transition to a sustainable economy or that lack alignment with international regulations or best practices in the industry.	This framework lays down general criteria and specific criteria applicable at either the customer or project level: — General applicable criteria, which have a cross-cutting impact on all sectors, follow international standards such as the Global Compact and the principles of the International Labour Organization (ILO), among others. — Specific applicable criteria affect businesses or projects in particular sectors (mining, energy, agriculture, infrastructure and defence), due to their potentially negative impact on the environment and/or society, in which the Group provides services and/or offers financial products.	It applies to new loan transactions granted to groups or companies with turnover in excess of 40 million euros.	Board of Directors	July 2023	Yes

⁹ Policies are available to all employees through the corporate intranet.

Policy	Purpose	Content	Scope of application	Approval	Last update	Available online ⁹
Environmental Risk Policy	Lay down general guidelines for the management and control of environmental risk, specifying the applicable principles and critical parameters and addressing all elements that are important to manage and control the risks associated with climate change and environmental degradation. These risks comprise two main risk factors: physical risks and transition risks.	Among the main objectives of the Policy is that of observing and embedding existing legal requirements and the commitments and initiatives undertaken by the Institution. These include the European Union's sustainability regulation, developed in 2018 under the European Commission's Sustainable Finance Action Plan (SFAP), and the action plans, guidelines, guidance, technical standards and documents issued by the ECB and European supervisory authorities (namely the EBA, the European Securities and Markets Authority (ESMA) and the European Insurance and Occupational Pensions Authority (EIOPA)). The Policy also embeds other voluntary guidelines and major international agreements, such as the Paris Agreement, the 2030 Agenda, the Task Force on Climate-related Disclosures (TCFD), the Task Force on Nature-related Financial Disclosures (TNFD), and the Basel Committee's Principles for effective management and supervision of climate-related financial risks. It involves multiple areas in environmental risk management and control due to the cross-cutting nature of environmental risk, which could affect the Institution as an additional risk driver alongside traditional banking risks (credit risk, market risk, liquidity risk and operational risk).	It applies to Banco de Sabadell, S.A., including its foreign branches.	Board of Directors	November 2025	No
Human Rights Policy	Support and uphold the protection of internationally recognised human rights within its sphere of influence; to that end, it takes into consideration the Group's relationship with its various stakeholder groups.	Its commitment is based on international frameworks such as the Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, the International Labour Organization's guidelines, and the United Nations Principles for Responsible Investment.	It has a global reach, including all of the Group's brands: Banco Sabadell in Spain, TSB in the United Kingdom and Banco Sabadell Mexico.	Board of Directors	April 2025	Yes

Policy	Purpose	Content	Scope of application	Approval	Last update	Available online ⁹
Code of Conduct	Define the criteria that should be followed for ethical and responsible behaviour, both in relationships within the Group itself and in those entered into with customers, suppliers, shareholders, investors and other stakeholder groups.	The Code sets out the principles that underpin the corporate culture and serve as a framework of reference, namely the will to serve, proximity, adaptability, commercial approach, innovation, professionalism, ethical conduct, sustainability, austerity, prudence, teamwork, compliance with prevailing legislation and any internally established regulations that may be applicable, transparency, and respect for the privacy and intimacy of the various data subjects whose personal data is subject to processing.	It is applicable in all jurisdictions and territories in which the Group carries out its activities, so they are required to formally adopt it.	Board of Directors	October 2023	Yes
Anti-Money Laundering and Counter-Terrorist Financing Policy	Establish the applicable principles, critical management parameters, governance structure, roles and responsibilities, procedures, tools and controls relating to anti-money laundering and counter-terrorist financing.	It defines key concepts related to AML/CFT and sets out the main procedures for identifying and managing ML/TF risks across all levels of the Group.	It applies to all Banco Sabadell Group entities subject to AML/CFT regulations and legislation, in accordance with the nature of their activities.	Board of Directors	November 2025	Yes
Corporate Crime Prevention Policy	Establish the applicable principles, critical management parameters, governance structure, roles and responsibilities, procedures, tools and controls relating to the prevention of corporate crime, and ratify the firm commitment of the Group to abide by those rules as well as ethical standards and, in particular, its resolve to implement rules and controls to minimise the commission of crimes and to confirm the complete and absolute intolerance of any inappropriate behaviour and, especially, any conduct that may constitute a criminal offence.	The Policy comprises the Corporate Crime Risk and Anti-Corruption Management and Organisation Model. Ultimate responsibility for it lies with the Board of Directors, while the CEC is responsible for overseeing the functioning, observance and execution of that model, in accordance with the stipulations of this Policy and of the Anti-Corruption Policy.	The Policy is applicable to the activity carried out by Banco Sabadell Group through its companies in the various territories in which it operates.	Board of Directors	December 2025	Yes

Policy	Purpose	Content	Scope of application	Approval	Last update	Available online ⁹
Anti-Corruption Policy	Establish the applicable principles, critical management parameters, governance structure, roles and responsibilities, procedures, tools and controls relating to anti-corruption, and ratify the firm commitment of the Group to abide by these rules as well as ethical standards and, in particular, its firm commitment to fight against corruption and to confirm the complete and absolute intolerance of any inappropriate behaviour.	The Policy comprises the Corporate Crime Risk and Anti-Corruption Management and Organisation Model. Ultimate responsibility for it lies with the Board of Directors, while the CEC is responsible for overseeing the functioning, observance and execution of that model, in accordance with this Policy and the Corporate Crime Prevention Policy.	The Policy is applicable to the activity carried out by Banco Sabadell Group through its companies in the various territories in which it operates.	Board of Directors	December 2025	Yes
General Policy on Conflicts of Interest	Set forth guidance for the conduct of individuals subject to the Policy, in accordance with the ethical standards and principles governing the Group's activities, creating a culture of compliance and a model of conduct based on honesty, professional responsibility and impartiality.	It establishes guidelines for detecting, recording and managing conflicts of interest, adopting measures for their elimination or mitigation.	The Policy applies to all Group companies.	Board of Directors	November 2025	Yes
Policy on the Internal Reporting System and Protection of Reporting Persons	The purpose of the Policy is to set up an internal reporting system in accordance with the provisions of Law 2/2023, which transposes Directive 2019/1937, and specifically with the duty to have a policy that sets out the general principles of the Internal Reporting System and the Protection of Reporting Persons, covering the internal communication system and its corresponding channels.	It sets out the general principles and safeguards of the internal reporting system, lists the relevant channels and designates the person responsible for managing the system.	The Policy is applicable to the whole of Banco Sabadell Group in all matters that do not conflict with the applicable legislation in the corresponding jurisdiction.	Board of Directors	July 2025	Yes

Policy	Purpose	Content	Scope of application	Approval	Last update	Available online ⁹
Director Selection Policy	Establish the principles and criteria that Banco Sabadell should take into account in its selection processes and also, therefore, in the initial fit and proper assessment and ongoing assessments of the members of the Board of Directors, as well as in the re-election of members of the management body in order to ensure their smooth succession, the continuity of the Board of Directors and the suitability of all its members. It also lays down the principles and targets in relation to diversity in the selection, induction and training of directors, once appointed and throughout their term of office.	This Policy establishes the purpose, scope of application, principles and objectives of the selection of candidates and the re-election of directors, paying close attention to diversity. It also identifies the impediments to membership of the Board of Directors, the competent bodies, the procedure for assessing suitability, onboarding and training targets, and the succession and renewal of directors. Finally, it outlines the approval, annual evaluation and information about the application of this Policy.	This Policy applies to the selection of candidates for the role of director of Banco Sabadell and to the directors put forward for re-election. It also applies to the subsidiary undertakings included within the prudential scope of consolidation, notwithstanding any adaptations made by these subsidiary undertakings according to their sectoral standards, the requirements of their supervisory bodies or the jurisdiction to which they are subject, and without detriment to their obligation to approve their own policies.	Board of Directors	November 2025	Yes
Remuneration Policy	Define the principles of Banco Sabadell Group's remuneration framework with the utmost transparency and clarity, so that they can be known and understood by all Group employees.	It establishes the remuneration criteria common to all Sabadell Group staff and to the staff of those companies required to disclose public information.	All entities within Banco Sabadell Group's prudential scope of consolidation. This Policy is not applicable to the Group's Directors due to their non-executive duties.	Board of Directors	November 2025	No
Prevention Plan	Ensure the integration of occupational hazard prevention into Banco Sabadell Group's management arrangements, encompassing all activities and functional levels of the organisation. Its implementation ensures the safety and health of Banco Sabadell Group employees and compliance with the regulations applicable in this regard, so as to ensure the control of occupational hazards, the effectiveness of preventive measures and the detection of any weaknesses that could give rise to new risks.	It establishes the policy established by Banco Sabadell Group, as well as the organisational structure, roles and responsibilities, procedures and resources required to implement preventive measures and ensure a safe and healthy work environment.	It is limited to the activities carried out by employees of companies affiliated with the Banco Sabadell Group Joint Prevention Service within Spain.	Prepared by the Occupational Hazard Prevention (OHP) division and approved by the State Health and Safety Committee (Comité Estatal de Seguridad y Salud, or CESS)	April 2023	No
Plan for Effective Equality between Women and Men	The purpose of the Equality Plan is to articulate a set of positive measures and actions to incorporate the principle of equality between women and men in the organisation.	The Equality Plan is structured into several sections that set out its objectives, a summary of the starting point, the Remuneration Audit, the actions to be implemented, and its monitoring and assessment arrangements.	Banco de Sabadell, S.A. and Sabadell Consumer Finance	Document negotiated and signed with the workforce's legal representatives	February 2022	Yes

Policy	Purpose	Content	Scope of application	Approval	Last update	Available online ⁹
Procurement Policy	Provide guidelines in relation to the procurement of any good or service and to the outsourcing of functions and in particular of critical or important functions to ensure that Banco Sabadell Group companies have suitable systems in place for internal governance and risk management.	It provides guidelines to ensure that, when procuring any good or service or outsourcing functions as defined by the EBA Guidelines (EBA/GL/2019/02) and Bank of Spain Circular 3/2022, Banco Sabadell Group has suitable systems in place for internal governance and, where applicable, risk management.	This Policy is applicable to Banco de Sabadell, S.A. and all Banco Sabadell Group companies in any of the geographies in which they operate, taking into account proportionality criteria, the nature of the business, their business model, the scale of their activities and the legal particularities and specific regulations of each geography in the application of the principles and parameters established therein.	Board of Directors	December 2025	Yes
Personal Data Protection Policy	Establish the principles and arrangements in relation to personal data protection (Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016).	It establishes a set of principles, application criteria, critical management parameters, roles and responsibilities to ensure that all personal data processing operations in the Bank are carried out using the defined channels, functions and strategies aimed at safeguarding the data subject's legitimate and fundamental right to data protection, while ensuring the fulfilment of the obligations and criteria established by the GDPR and other related regulations currently in effect.	This Policy is applicable to all personal data processing taking place in Banco de Sabadell, S.A., both automated and non-automated.	Board of Directors	November 2025	No
Information Systems Security Policy	Establish the information systems security management and control framework from a holistic viewpoint, defining the general action guidelines to facilitate the definition, management, administration and implementation of the necessary security mechanisms and procedures to effectively apply the corresponding security level to Banco Sabadell's information systems.	It establishes the information systems security management and control framework from a holistic viewpoint, defining the general action guidelines to facilitate the effective definition, management, administration and implementation of the necessary security mechanisms and procedures in Banco Sabadell's information systems	This Policy is applicable to the activities of Banco Sabadell and its foreign branches. The above notwithstanding, this Policy is also applicable to the providers of the Institution's information systems, as set forth in the Banco Sabadell Policy on Outsourcing of Functions.	Board of Directors	November 2025	No

Policy	Purpose	Content	Scope of application	Approval	Last update	Available online ⁹
Commercial Communication Policy	The purpose of this Policy is to establish the general principles and critical parameters governing all advertising activities, and the governance structure, roles and responsibilities, procedures and key tools relating to the management of the Institution's commercial communications.	The procedures required to adapt the products offered and the way they are presented according to the specific characteristics of the target audience, promoting a thorough understanding of the product and avoiding advertising mechanisms that contradict those characteristics, are described in detail. In this way, the Institution tries to prevent the legal and reputational risks that may stem from advertising activities, always considering the complexity of the product or service offered, the characteristics of the advertising method used and the provisions of the applicable legislation. In addition, the Bank has the Banco Sabadell Group Code of Conduct and a Communication Manual, both of which set out a set of ethical principles for action. The Policy reflects Banco Sabadell's commitment to act in a socially responsible way in its commercial communications, undertaking to engage in lawful, proper, honest, truthful, clear and transparent advertising, based on respect for human dignity and the recognition of the rights and interests of consumers, aligning with the principles of fair competition in business. In any event, Banco Sabadell fosters creativity in the area of commercial communications based on its ethical principles and values, adopting these criteria when creating advertising campaigns. The unit responsible for this Policy is Retail Banking, more specifically, Marketing.	This Policy applies to all advertising activities carried out by Banco Sabadell in the Spanish territory under any of its commercial brands, including all commercial communications and information aimed at the general public (customers, potential customers, investors, etc.).	Board of Directors	September 2025	Yes

Policy	Purpose	Content	Scope of application	Approval	Last update	Available online ⁹
Tax Strategy	Ensure responsible and transparent tax management, aligned with the Group's mission, values, business strategy and commitment to sustainability.	Definition of the principles and guidelines governing the Group's tax activities (principles of efficiency, prudence, transparency and mitigation of tax risk; the promotion of a cooperative relationship with tax authorities; and the fulfilment of stakeholders' expectations through the implementation of the principle of tax transparency).	It applies to Banco Sabadell Group (including its permanent establishments and subsidiaries).	Board of Directors	May 2023	Yes
Tax Risk Policy	Ensure compliance with the Tax Strategy by integrating tax responsibility into decision-making, in accordance with the principles and guidelines established therein.	It establishes the guidelines for tax risk management and control within Banco Sabadell Group, laying down the applicable principles and critical parameters and encompassing all significant elements for the management and control of risks associated with breaches of the principles and guidelines established in the Banco Sabadell Group Tax Strategy.	It applies to Banco Sabadell Group (including its permanent establishments and subsidiaries).	Board of Directors	July 2025	No

1.3.4 Due diligence procedures in relation to human rights

Banco Sabadell is firmly committed to respecting, promoting and protecting internationally recognised fundamental human rights in all its activities.

This commitment extends to all the geographies in which it operates and encompasses relationships with its key stakeholder groups: employees, customers, suppliers and local communities.

From a governance perspective, the Group has a Human Rights Policy and a Human Rights Due Diligence Procedure, both approved in 2021 and subject to annual review. These documents establish principles for action and mechanisms to identify, prevent, mitigate and redress negative impacts, as well as train employees on human rights risks stemming from banking activities, especially in lending, human resources management and supplier procurement.

In 2023, the Group's Code of Conduct, approved by the Board of Directors in 2021, was updated to adapt it to the latest regulatory requirements and market standards. Its implementation from 2021 onward required the express agreement of all staff. As a result, the Supplier Code of Conduct was revised, incorporating elements such as the corporate crime risk management model and the role of the Corporate Ethics Committee as the supervisory body of the whistleblowing channel.

This principle is enshrined in the Group's Sustainability Policy, approved by the Board of Directors in 2021 and reviewed annually. In 2025, the Boards of Directors of the Group's international subsidiaries ratified their adherence to this policy.

The Human Rights Policy has a global reach, including all of the Group's brands: Banco Sabadell in Spain, TSB in the United Kingdom and Banco Sabadell Mexico. More specifically, the Human Rights Policy applies to any company acquired by the Group, whether it remains an independent legal entity or is merged with the parent company or another entity within the Group. The principles and parameters of the human rights policy and due diligence procedures also apply to any business partners that do not have their own Human Rights Policy.

Its commitment is based on international frameworks such as the Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, the International Labour Organization's guidelines, and the United Nations Principles for Responsible Investment.

Additionally, the Group has strengthened its commitment by joining relevant initiatives, including:

- The United Nations Global Compact, incorporating principles related to human and labour rights, such as non-discrimination, the eradication of child labour and the elimination of forced labour.
- The Equator Principles, of which the Bank has been a signatory since 2011, which provide a framework for social and environmental risk management, including human rights due diligence.
- The Principles for Responsible Banking, especially those related to impact, customer relations and transparency.

The Group undertakes to prevent its activity from creating circumstances that could lead to vulnerability or exclusion for its customers, especially in personal, economic or social contexts that may affect the exercise of their rights on equal terms. To that end, the Group has implemented control tools that enable the identification and assessment of certain adverse impacts relating to:

- accessibility to some banking services affecting customers with functional diversity, particularly those with mobility, hearing or visual impairments, through the management of complaints received by the Customer Care Service. The Group has recently completed various initiatives to adapt its facilities, products and services to comply with prevailing accessibility regulations.
- monitoring of suspicious transactions involving digital fraud and corruption, through a specialised transaction fraud unit.
- detection of money laundering and/or terrorist financing, through a unit specialised in international sanctions.

Additionally, the Group promotes inclusion through products and services with positive impact, such as social housing management and financial inclusion, underpinned by digitalisation and financial education programmes. It also promotes transparency and responsible communication, making financial products and their terms and conditions easier to understand.

In the area of digital fraud prevention, especially among the over 65s, the Bank has a unit specialising in Transaction Fraud, which manages to prevent 87% of fraud attempts through alert systems in transactions such as transfers, payments and Bizum.

The Group actively supports the communities in which it operates, through donations and corporate volunteering.

Finally, the Group contributes to the attainment of the United Nations' Sustainable Development Goals (SDGs) linked to human rights, through programmes and initiatives focused on quality education (SDG 4), no poverty (SDG 1), good health and wellbeing (SDG 3), decent work and economic growth (SDG 8), gender equality (SDG 5) and reduced inequalities (SDG 10).

The Group has not received any workplace complaints related to human rights from its own workforce, nor any complaints of forced or child labour.

In contrast, in 2025 the Harassment Prevention Committee received four complaints of workplace and/or sexual harassment.

In 2025, there were no records of any penalties or compensation for injury and damages as a result of any cases of discrimination and harassment.

None of the human rights-related complaints or claims received through the SAC in 2025 have resulted in any violation of human rights affecting consumers or end-users.

1.3.5 Risk management and internal controls over sustainability reporting

Banco Sabadell Group has a Policy on Internal Controls over Sustainability Reporting, whose goal is to create a control framework over the sustainability information disclosed by the Group in this report by establishing the principles, critical parameters, governance structure, roles and responsibilities, procedures and key tools relating to the definition, establishment, execution and monitoring of the Group's Internal Controls over Sustainability Reporting (ICSR).

The main responsibility of the ICSR unit is to design and implement the general control framework for the Sustainability Report.

This includes the identification of significant processes involved in generating the quantitative information contained in the Sustainability Report. A data generation process is considered to be one which generates quantitative indicators associated with the Impacts, Risks and Opportunities (IROs) stemming from the double materiality analysis and one which comprises common elements, such as a data origination source and the processing and analysis of those elements prior to final disclosure.

The ICSR unit analyses those data generation processes, through a thorough analysis with the expert areas involved, and identifies the risks associated with those processes, which are related to the content of the Spanish National Securities Market Commission (Comisión Nacional del Mercado de Valores, or CNMV) guidance that serves as the frame of reference, and controls are designed and incorporated, jointly with those responsible for the data, to mitigate the previously identified risks.

The resulting matrix of risks and controls provides a holistic view of the processes and systems involved in producing the Sustainability Report. The matrix can be consulted to identify the executor and the reviewer of the control, the data that it covers and the process to which it belongs, among other fields.

Furthermore, with the entry into force of the new European Corporate Sustainability Reporting Directive (CSRD), the ICSR unit has identified risks and designed controls over the new double materiality exercise in order to ensure the correct execution of this exercise and its completeness. These controls not only mitigate the risks associated with the double materiality analysis, but they are also applied during both the planning phase and the report completion phase to ensure the integrity of the information disclosed in the Sustainability Report.

Based on the above-mentioned Directive, content controls have been established over the qualitative information disclosed throughout the Sustainability Report in relation to the report's governance structure due to its structural nature, as this is considered sensitive information and there are risks involved in their disclosure to the markets.

With regard to the assessment of the established controls, which mitigate the associated risks through their prevention or detection, this is carried out using the Bank's Governance, Risk and Compliance (GRC) tool, which is managed by the ICSR unit, where the areas responsible complete assessment forms accompanied by evidence supporting each of the controls. The tool sends automatic reminders to participants of the ICSR control assessment, reinforcing compliance with the pre-established deadlines and ensuring the process is executed correctly.

Having completed the assessment, the GRC tool managed by the ICSR unit has a certification module that can be accessed by members of

Senior Management. The certification process is based on the hierarchical and organisational ratification, at three levels, of the result achieved in the assessment of the controls.

The Board of Directors delegates the supervisory function regarding the internal control systems to the Board Audit and Control Committee. At least once a year, the current ICSR situation, arising from applicable regulatory requirements, is reported to the Board Audit and Control Committee and to the Sustainability Committee. At the end of the tax year, the results of the control assessment and the related conclusions are also escalated.



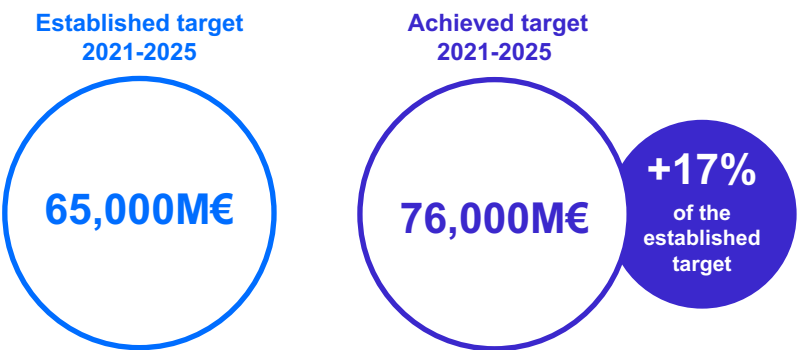
1.4 Sustainability strategy and business model

The Institution’s business model is geared towards profitable growth that generates value for shareholders. This is achieved through a strategy of business diversification based on criteria related to profitability, sustainability, efficiency and quality of service, together with a conservative risk profile, while maintaining high standards of ethics and professional conduct combined with sensitivity to the interests of all stakeholders.

The Group promotes sustainable financing and investment to drive forward the transition towards a more sustainable model and a low-carbon economy.

The Group promotes sustainable financing and investment to drive forward the transition towards a more sustainable model and a low-carbon economy, offering customers and investors the best possible solutions. The Bank committed to mobilise €65bn in sustainable finance between 2021 and 2025. The Bank mobilised over €76bn over the 2021-2025 period, surpassing the established target by more than 17%.

Sustainable finance 2021-2025



To deliver on this commitment, the Bank is taking further action to raise awareness and offer advice across all sectors of the business fabric, offering solutions to finance the investments required for this transition.

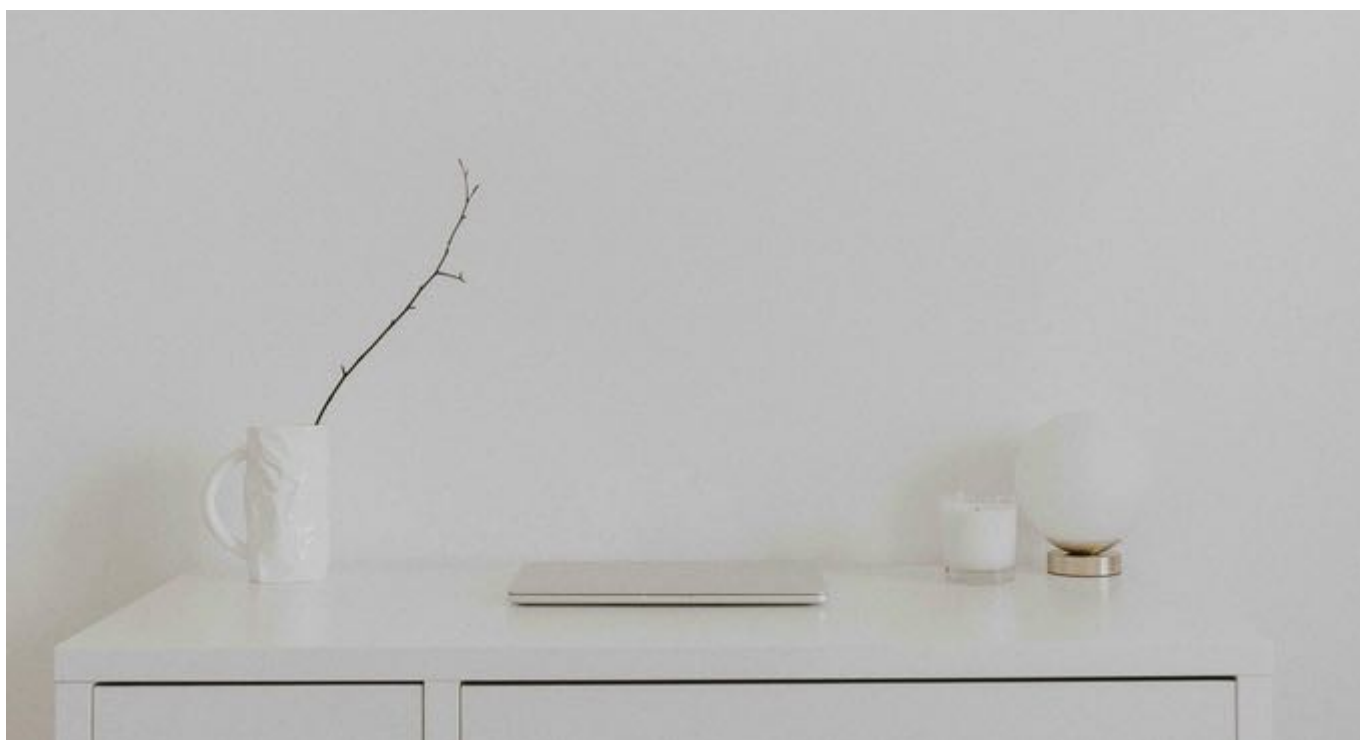
Sustainable financing solutions:

- Financing solutions in the different business lines: To bring processes for loan approval, credit portfolio management and reporting tasks in line with international standards on sustainable financing (the Green Loan Principles and Sustainability-Linked Loan Principles issued by the Loan Market Association and the Green Bond Principles and Sustainability-Linked Bond Principles issued by the International Capital Market Association, ICMA), the Institution has defined the following types of sustainable financing, according to the intended use of the funds:
 - Green and Social Loans (GSLs), in which the use of the funds is the main criterion for determining the green, social or sustainable nature. This type of financing is closely related to Banco Sabadell's Sustainable Financing Framework, whose main references are the EU Taxonomy and the best practices in the market such as the Green Loan Principles, and to the green bonds issued by the Bank in recent years under the SDG Bond Framework.

To promote GSL transactions, the Bank has approved discounts that allow it to offer better prices to customers.
 - Sustainability-Linked Loans (SLLs), which relate to the type of financing that incentivises the achievement of sustainability targets, linking the transaction price to the evolution of one or more KPIs. This category does not require the funds to be used for any specific purpose. It is considered essential that the selected indicators be relevant for customers, as this enables their sustainability strategy to gain more traction.
- Sustainable savings and responsible investment solutions (more details in section "1.4.4. Sustainable savings and responsible investment solutions").
- Issuance of own-name sustainability bonds (more details in section "1.4.5. Issuance of Banco Sabadell sustainability instruments").

Specialist advice:

- Specialised teams: located throughout the entire branch network, trained and certified in sustainability, they provide a sectoral perspective on sustainability to identify the most appropriate solutions according to the needs of each customer facing transition challenges.
- Expertise hubs: to complement the above, the Institution has cross-cutting units specialising in sustainability that support customers in the areas of structured finance and corporate & investment banking, in addition to helping them to find and apply for subsidies for the Next Generation funds.
- Personalised support: a support service is offered on an individual basis to corporate customers to delve into future challenges and identify the most appropriate solutions through sustainable finance according to each customer's needs. In the case of SMEs, the Bank helps its customers to understand sustainability, analysing their sector, providing roadmaps to incorporate sustainable practices, and identifying public aid to drive forward their transition.
- Ongoing advisory service: ongoing advisory programme with outreach and awareness-raising actions, through the Bank's own channels, such as the Companies Hub and its series of conferences.



Our resources

Banco Sabadell's *raison d'être* is to **help people and companies bring their projects to life**, anticipating their needs and taking care to ensure that they make the best economic decisions through responsible management of the environment and society.

Banco Sabadell accomplishes its mission while staying true to its values:

- **Commitment and Non-Conformism**, values that define its way of being.
- **Professionalism and Effectiveness**, values that define its way of working.
- **Empathy and Openness**, values that define its way of interacting.

 18,736 **employees**¹

 >1,300 **branches and offices**

 Presence in **13 countries**

 >€160bn in **customer loans**

 >€220bn in **customer funds**

 Robust **Corporate Governance Structure** to ensure effective and prudent management of the Institution

 An **internal cybersecurity team** with over 100 specialised professionals

 > 97% of employees **trained in sustainability**

 **Corporate crime prevention and anti-corruption model** certified by AENOR based on official standards (UNE 19601 and ISO 37001)

 75% of **suppliers assessed in terms of ESG** given a score² of A+, A or B

 Fostering culture and the arts, research activities and education through the **Banco Sabadell Foundation**

Our strategy is aligned with the Sustainable Development Goals and with the Paris Agreement, guiding our organisation and its activities and supporting our customers and society with the transition to a sustainable economy



Our creation of value

Customers

- > **€76bn mobilised** in sustainable financing solutions since 2021, outperforming the target of reaching **€65bn** (2021-2025)
- **Net Promoter Score** in which the Institution ranked 5th in retail customers, 2nd in SMEs and 3rd in Corporates³
- Setting of **decarbonisation pathways** for 11 carbon-intensive sectors

Investors

- Participation in the **issuance** of own and customers' **sustainability bonds** >€19bn (2021-2025)
- >€275m in investment in **renewable energy projects** (2021-2025)
- Included in the **Dow Jones Best-in-Class World Index**
- **Shareholder value creation**: 11%⁴
- **83% of assets under management** invested in sustainability funds⁵

Workforce / Company

- Certified as **Top Employer** in Spain in 2025
- Making progress on **diversity** (43% of women on the Board of Directors, 36% in the management team, and 43% in middle management)
- Certification in **transparency and tax responsibility**
- **Level of satisfaction with training**: 90%
- **~ 100% of power consumption** from renewable sources

Society

- ~ 10,000 beneficiaries of **financial education programmes**
- ~ 23,000 **social rent agreements** signed by **vulnerable customers** through **Sogeviso** (subsidiary engaged in affordable housing management)
- > 3,100 corporate **volunteers** in **social impact projects**
- **Offsetting** of own emissions through reforestation projects

Note: Data as at December 2025.

¹ Of which: 13,252 in Spain, 4,650 in the United Kingdom, 509 in Mexico and 325 in other geographies.

² ESG score out of 100: A+ (Excellent with a score of 96-100), A (High with a score of 75-95), B (Medium-High with a score of 50-74), C (Medium-Low with a score of 25-49) and D (Low with a score of 0-24).

³ Accenture benchmarking of major Spanish financial institutions (2025 data).

⁴ Calculated as the change in tangible book value per share excluding the share buyback, the dividend distribution and the impact of buybacks over the past 12 months on the tangible book value per share.

⁵ Funds sold under the SABAM brand and other Amundi asset manager brands. Considered sustainability funds as per Article 8 or 9 of the EU's SFDR.

1.4.1 Sustainable financing solutions for Corporate & Investment Banking

Corporate & Investment Banking (hereinafter, CIB) is the business unit that offers financial and advisory solutions and specialised products to large corporations, financial institutions and, when required, customers from the Business Banking segment, both within Spain and internationally. The figures shown below do not include Renewable Energy Project Finance transactions, which are described individually in the following section.

As at the end of 2025, the Bank had taken part in 129 sustainable financing and investing transactions in the area of CIB, which includes corporate business transactions and investment banking transactions.

Corporate Banking

In 2025, in the Corporate Banking segment, 107 transactions were signed for a total amount in excess of 4.4 billion euros, an increase of 55% compared to 2024. Of these, 63 transactions amounting to over 1.3 billion euros are considered green and social loans, as they are covered by the Bank's Sustainable Financing Framework. In addition, 44 sustainability-linked loans were signed, amounting to over 3.1 billion euros.

In line with the decarbonisation strategy, the financing of what the market identifies as new technologies, other than conventional renewables, has been boosted. These new solutions enable progress to be made in complementary areas such as digitalisation and the circular economy, driving innovations that broaden the scope of the energy transition. These include the modernisation and distribution of electricity grids, the development of sustainable water infrastructures, as well as projects linked to Carbon Capture, Utilisation and Storage (CCUS), and biogas production. These initiatives reflect the Bank's commitment to innovation and diversification of solutions for key sectors.

In addition, the Institution continues to promote the issuance of sustainable guarantees, whereby the company or the underlying asset is classified as sustainable. The Bank also supports its customers through short-term sustainable financing solutions that encompass, directly or indirectly, their entire value chain, both upstream (suppliers) and downstream (customers). This strengthens a comprehensive approach that enables us to address not only the negative impacts associated with our customers' production processes, but also those generated across the entire value chain.

In any event, operations are being monitored on a continuous basis jointly with customers and sustainability agencies through the KPIs defined for each loan. This allows us to better understand the positive impacts of our lending and to identify potential new sustainable financing needs that may arise for our customers.

Sustainable financing is prioritised as a formula to support customers and it is increasingly being included in credit approval procedures. In fact, in some cases the authorisation of new transactions is conditional upon the inclusion of an ESG element in the financing structure. To that end, custom proposals are being developed according to the needs of customers, their sustainability strategy and factors specific to their industries.

107
Transactions for a total of
4.4bn€

Investment Banking

In 2025, Banco Sabadell was the placement entity of green and sustainability bonds in the primary debt market, participating as Joint Lead Manager in the following public issuances for customers:

- *Colonial*: green bond in the amount of 500 million euros, with a 5-year maturity and a 3.25% coupon, issued in January.
- *Comunidad de Madrid*: sustainability bond in the amount of 1 billion euros, with a 10-year maturity and a 3.137% coupon, issued in February.
- *Castilla y Leon*: sustainability bond in the amount of 500 million euros, with a 7-year maturity and a 2.9% coupon, issued in May.
- *General Alquiler de Maquinaria*: sustainability bond in the amount of 50 million euros, with a 5-year maturity (November 2030) and a 5.25% coupon, issued in November.

The Bank acted as Sole Lead Manager, sole placement institution, in the following private bond issuance:

- *Acciona Financiación Filiales*: green bond in the amount of 12.2 million euros, with a 2-year maturity and a floating coupon at Euribor + 80bps, issued in October.

Furthermore, the Bank has placed 385 million euros in green or sustainability-linked commercial paper programmes for its customers, with most of this volume corresponding to commercial papers issued by Barceló, Elecnor, ICF, Opdenenergy, Nexus and Grenergy.

Project Finance

Banco Sabadell remains committed to renewable energies in the markets in which it operates, as one of the pillars of its Structured Finance activity, thereby ratifying its commitment to the decarbonisation of society.

The Bank continues to rank among the leading financiers in the Iberian Peninsula, with €591m in financing as at 31 December, placing it within the top three financing banks by number of transactions, according to Infralogic. Despite downward price volatility in the solar energy segment, a significant volume of power plants continued to be installed. In fact, it is expected that, from next year onwards, plants hybridised with Battery Energy Storage Systems (BESS) or combining different technologies will begin to emerge. It is also worth mentioning the 2.7% increase in electricity demand, despite existing grid congestion.

As at December 2025, according to Red Eléctrica de España, 11,120 MW of new renewable capacity had been installed, notably including 10,004 MW from solar projects and 1,116 MW from wind projects. These figures represent cumulative investment in renewable energies of €8bn and are in line with the previous year, during which a total of 1,289 MW of wind projects and 7,309 MW of solar projects were installed.

Electricity prices have shown significant fluctuations when considering the average price (baseload) and the solar capture price. An analysis of the baseload price shows an upward trend, with the annual average standing at €65.52/MWh in December, representing a 4% increase compared with the previous year. This was good news for wind energy as it will capture a large share of this price increase. By contrast, the solar capture price (what solar plants effectively earn during production hours) declined compared to the previous year, which had already recorded a very significant decrease. In 2025, the solar capture price stood at €34.21/MWh – a 15.6% reduction compared to the previous year. The main driver of this decline is the increase in installed

solar capacity, which has resulted in a substantial rise in the number of hours with zero prices, which was already observed in spring 2024, intensified further during this year, with 797 hours at zero or negative prices.

This downward pressure on capture prices will continue in the coming years, driven by the continued increase in installed solar capacity. From 2029-2030 onwards, however, this trend is expected to change with the introduction of battery storage and rising demand. The National Integrated Energy and Climate Plan (PNIEC, by its Spanish acronym) includes a target of 22.5 GW of storage capacity, of which 9 GW are expected to be BESS. The Bank is noticing strong sponsor interest in the hybridisation of existing solar plants with battery storage, which will help to drive a significant increase in average capture prices. Projects with hybridisation potential have already been financed during the year. Next year, financing activity is expected to include the first battery installations within solar plants and even standalone battery storage projects.

Another key aspect shaping the future is the expected increase in electricity demand, driven by the electrification of society and, in particular, by the implementation of data centres. Despite grid saturation, a lack of connection points and slow planning and licencing processes, large business groups continue to invest in the implementation of data centres, which will help increase demand and drive prices up. The implementation of data centres should help solar and wind projects sign long-term Power Purchase Agreements (PPAs), improving the stability of such projects and supporting the implementation of battery solutions to supply energy over more hours.

In terms of new transactions during 2025, 33 were recorded, with a total volume of €1,060m. This was 3 less than in the previous year but the volume remained broadly in line with the 2024 figure of €1,109m. Broken down by country, new transactions in Spain fell from €939m to €591m, while volumes in the United States rose from €45m to €383m. Also noteworthy were two offshore wind operations in the United Kingdom, with a combined volume of €86m.

33

Transactions recorded with a total volume of

1,060M€

2025

Country	Amount
Spain	591
UK	86
USA	383
Total	1,060

Data in million euros.

Technology	Amount
Wind	223
Photovoltaic	497
Offshore	134
Solar + BESS	64
Solar + Wind	142
Total	1,060

Data in million euros.

As shown in the table, the volume of transactions in photovoltaic projects stands out, amounting to €497m, while wind projects reached €223m. Also worth highlighting are the first solar power plants combined with BESS, with a volume of €64m, as well as hybrid wind and photovoltaic projects totalling €142m. These hybrid technology models are expected to be a growing trend in the future.

1.4.2 Sustainable financing solutions for Business Banking

The Business Banking unit offers financial products and services to legal and natural persons for business purposes, serving all types of companies with turnover of up to 200 million euros, as well as the institutional sector.

Green and social loans

As at the end of 2025, more than 4.4 billion euros were mobilised through companies using the funds for purposes aligned with the Bank's Sustainable Financing Framework, mainly through medium- and long-term financing, which includes secured and unsecured loans, leases and rentals, and guarantee facilities.

These do not include Renewable Energy Project Finance transactions, which are described individually in previous sections.

Sustainability-linked loans

During this period, the Bank mobilised more than 3 billion euros in sustainability-linked loans for corporates and SMEs to fund green purposes only, primarily focused on the reduction of their CO₂ emissions.

Sabadell Renting's mobility solutions

During 2025, Sabadell Renting continued to strengthen its ECO vehicle offering, in line with its strategy focused on promoting environmentally friendly mobility.

As at the end of 2025, 77% of the vehicles on offer corresponded to ECO models (i.e. hybrids and electric vehicles that have the 'ECO' or 'zero emissions' environmental label awarded by Spain's traffic authority, DGT), while 52% of the new contracts signed were for this type of vehicle.

Sabadell Renting has kept its commitment to promoting sustainable mobility solutions through direct communication with the Bank's customers, both companies and individuals, throughout the year. These initiatives have boosted the purchase of ECO vehicles available on the market, with special emphasis on the offer of electric vehicles, through specific campaigns aimed at all employees of Banco Sabadell Group.

Official agreements

In September 2025, two new special agreements were signed with the European Investment Bank (EIB) to allocate new financing to SMEs and projects, of which at least 133 million will be dedicated to sustainable purposes in Spain.

Social loans

In the area of social loans, it is worth highlighting those granted to micro-enterprises for the purpose of promoting and maintaining employment.

The Bank has granted financing to SMEs and micro-enterprises¹⁰, mainly through loans and credit facilities, thereby supporting job retention and fostering the development and growth of the business and industrial fabric across each region, totalling more than 13.2 billion euros between 2021 and 2025. This means that 88% of the target set for that period has been reached.

The social loans target for 2021-2025 was initially defined based on criteria that have been narrowed in recent years to align with the Institution's framework for the issuance of sustainability bonds, focusing on financing activities that promote new jobs, development, and the growth of the business fabric in the most disadvantaged regions, which has consequently influenced the achievement of the target for this period.

The Bank monitors the impact of the financing granted to SMEs and micro-enterprises. This way, out of all SMEs and micro-enterprises that received financing in 2023, 68% maintained or increased their number of employees (data as at 2024 vs 2025¹¹) and over 65% improved their sales volumes.

In addition, in relation to the financing granted in 2025 to the self-employed, it should be noted that approximately one-third was granted to women.

Support for businesses

In order to help businesses achieve a better understanding of sustainability, a series of webinars were organised through the Bank's Companies Hub which, drawing on examples of good practice implemented by customers and experts, dealt with aspects related to the Next Generation EU funds, which cover the sustainability pillar. Nine sessions on sustainability topics were held, notably featuring sessions on the ICO MRR (Recovery and Resilience Mechanism) Green facilities, sustainable reverse factoring and green financing for the tourism industry.

The annual visit to businesses now includes a conversation about sustainability, providing customers with the necessary background information and explaining the benefits of moving towards sustainability, and proposing financing solutions for projects that enable greater energy efficiency and a reduction of their carbon footprint.

Next Generation EU

Financial institutions have the responsibility of supplementing the funds made available by European institutions in order to repair the consequences of the pandemic as much as possible and move towards a more sustainable economy. It is also essential to provide the maximum possible capillarity to the programme of European funds in order to ensure that it is rolled out to the entire business world, including SMEs. The Addendum to the Recovery, Transformation and Resilience Plan activated the ICO MRR facilities, a set of credit lines from Spain's Official Credit Institute (Instituto de Crédito Oficial, or ICO), with which Banco Sabadell collaborates extensively.

In 2025, the Bank was particularly active in raising awareness of these facilities, including both its Companies and Entrepreneurs tranche and its Green tranche.

¹⁰ According to the criteria outlined in Commission Recommendation 2003/361/EC, a company is considered a micro-enterprise if it meets all of the following criteria: fewer than 10 employees (permanent staff), annual turnover ≤2 million euros, or balance sheet total ≤2 million euros.

¹¹ Calculations based on public information contained in annual accounts, corresponding to 74% of financed enterprises. Information reported with a one-year gap.

1.4.3 Sustainable financing solutions for Retail Banking

Retail Banking is Banco Sabadell's business unit that offers financial products and services to individuals for personal use. Banco Sabadell supports customers in the transition to a more sustainable economy, offering a range of solutions with products and services for home purchases and renovations, sustainable mobility or the installation of renewable energies and wastewater treatments. In addition, the Bank offers investment opportunities that contribute to sustainability.

Sabadell Consumer, a wholly-owned consumer finance entity of Banco Sabadell, has supported growth in the sector of sustainable solutions for its customers, primarily through photovoltaic installations. In 2025, this sector was negatively affected mainly by low electricity prices, resulting in longer investment recovery periods and reducing the benefits of these installations compared to previous years. Conversely, it has signed more partnership referral agreements with companies that focus on buildings' façade renovation and cladding, where an increased number of grants managed by the autonomous communities has led to growth in this segment of the sustainable sector.

Lastly, in terms of payment systems, Banco Sabadell continues to work towards its objective of reducing its environmental impact, encouraging customers' use of digital payments through virtual cards, which are included in all the main X-pay systems (Google Pay, Apple Pay, Samsung Pay, etc.). Furthermore, for customers with physical cards, these are manufactured with recycled biodegradable PVC materials, thus avoiding the generation of plastic and offering customers the opportunity to do their part in overcoming this challenge.

Green financing solutions for individuals

In the case of products designed to finance project development or sustainable initiatives, it is worth mentioning the following solutions that Banco Sabadell offers its customers:

- **Green mortgages:** Banco Sabadell offers a reduced price across its entire mortgage range to incentivise the purchase, construction and renovation of homes with the highest EPC ratings (A+, A or B), in accordance with the national certification system and in line with the Institution's Eligibility Guide.

As at December 2025, the volume of new mortgages with sustainable certification came to more than 840 million euros.

- **Sabadell green renovation loan:** the aim of the Sabadell 'eco-reformas' (green renovation) loan is to encourage home renovations and/or purchases that improve the sustainability and energy saving capacity of a primary or secondary residence. The Bank offers financing, with attractive conditions, for improvements of openings (windows and doors), upgrades of heating and cooling systems to make them more efficient, and purchases of energy-efficient household appliances, i.e. those with an EPC rating of A or higher.
- **Sabadell green car loan:** the Bank offers the 'préstamo coche ECO' (green car loan), aimed at retail customers, which enables the purchase of 'zero emissions' or 'ECO' labelled vehicles with very attractive conditions, thus contributing to the adoption of cleaner vehicles that are suited to the new low-emission zones in Spain's largest cities.
- **Sabadell Renting's mobility solutions:** as explained above, Sabadell Renting also offers ECO or green vehicles to retail customers, thanks to having placed considerable focus on its sustainable mobility activity.

+840M€

Mortgages with sustainable certification at December 2025

Social financing solutions for individuals

In the area of social financing, Banco Sabadell continues to proactively offer solutions to customers with mortgage or non-mortgage loans who may be experiencing difficulties, with the aim of helping those customers to meet their obligations, relieve their financial burden and avoid default situations.

With regard to vulnerable customers¹², it should also be noted that:

- Customers at risk of financial exclusion who have been officially recognised as refugees (they hold a white or red card) or who have limited resources may open Banco Sabadell's Basic Payment Account free of charge, thus gaining access to free services such as cash withdrawals using debit cards, domestic transfers and transfers to EU countries, direct debits and online banking, among others. Over the course of 2025 (up to 31 December 2025), 533 Basic Payment Accounts were opened, including 106 opened by vulnerable customers. In terms of the account holders, 551 people opened a Basic Payment Account, 109 of whom belonged to the vulnerable group.
- There are specific benefits for customers aged 65 or over, such as the issuance and renewal of a fee-free passbook and free transfers throughout Spain and the European Economic Area carried out at a branch. Furthermore, customers who are pensioners and have income of less than 10,000 euros per year can access certain additional subsidies and benefits.
- The customer service model is particularly mindful of vulnerable customers (those vulnerable due to their age, reduced mobility or other constraints) and/or non-digital customers (those with no access to remote banking), with specific protocols for this group to address specific situations, such as the closing of branches, changes to the usual services offered and certain risk transactions such as cash withdrawals at branches, offering them unique support tailored to the possibilities of each customer.
- The Code of Good Practice is applied when granting financing transactions to safeguard the interests of customers, ensuring that they choose the product that is best suited to their needs and to their financial capacity, paying particular attention to customers in vulnerable situations (natural persons who, due to their abilities, needs or personal, economic, educational or social circumstances, find themselves in a situation of distress or helplessness that prevents them from going about their daily lives in the same conditions as other consumers).
- Finally, the application of the Code of Good Practice for the restructuring of mortgages for vulnerable customers (Royal Decree-Law 6/2012 and Royal Decree-Law 19/2022, whose validity period ended in November 2025, with the exception of natural persons living in areas affected by the DANA flash floods, for whom the Code will remain in force until the end of May 2026) was updated and made more flexible to better respond to low-income mortgage customers. For customers with complex financial situations who do not meet the requirements set forth in the Code of Good Practice, other solutions tailored to their economic situation or current vulnerability are explored, in line with applicable regulations and the principles for safeguarding mortgage debtors.

1.4.4 Sustainable savings and responsible investment solutions

In the area of investment, both pension fund manager BanSabadell Pensiones, EGFP S.A. and Aurica Capital, a venture capital enterprise that invests in Spanish companies with plans to expand in foreign markets, have adopted the United Nations Principles for Responsible Investment (PRI) in the investment manager category. Pension funds individually subscribed to the PRIs by BanSabadell Pensiones, EGFP S.A. (hereinafter, BSP) include BanSabadell Pentapensión Empresa FP, the Fondo de Pensiones de los Empleados de Banco Sabadell MF2000 pension fund, the Fondo de Pensiones de los Empleados de Banco Sabadell GM pension fund, the BanSabadell 18 FP pension fund, and the Fondo de Pensiones de la Compañía de Servicios de Bebidas Refrescantes pension fund.

It should be noted that, in 2025, UNPRI (Principles for Responsible Investment), a global organisation created by the United Nations to promote the integration of environmental, social and governance factors into investment decisions, awarded BanSabadell Pensiones its highest distinction (five stars) in Investment Strategy, Governance and Direct

¹² For more detailed information in relation to vulnerable customers, see section [3.2.5 Financial inclusion and access to products and services](#).

Investment. Four pension funds managed by BSP, including the pension fund that Banco Sabadell's Employee Pension Plan is part of, were also awarded five stars. This recognition solidifies BSP's outstanding ESG investment management, highlighting its strong commitment to the globally accepted principles for socially responsible investment.

Savings and investment or similar products

With regard to mutual funds, Banco Sabadell maintains its strategic alliance with Amundi, Europe's leading asset manager, which has been committed to sustainable investment since its creation.

Amundi has been a signatory of the United Nations Principles for Responsible Investment since 2006.

As at 2025 year-end, 24 Sabadell Asset Management funds (9,317 million euros) promoted environmental or social characteristics, meaning that they are classified as Art. 8¹³ funds under the European Sustainable Finance Disclosure Regulation (SFDR). When combined with the Amundi mutual funds distributed by Banco Sabadell (6,134 million euros), it means that 15,451 million euros, or 83.23%, of Banco Sabadell customer assets invested in non-guaranteed Sabadell Asset Management or Amundi mutual funds promote environmental or social characteristics or have environmental or social objectives (Art. 8 or Art. 9 of the SFDR¹⁴).

In 2025, the Bank maintained the range of investment and savings products that meet sustainability criteria, comprising 24 Sabadell Asset Management funds that comply with Art. 8 of the SFDR. As at 2025 year-end, customers' assets invested in mutual funds meeting ESG criteria stood at 83.23%, above the target set for 2025 of 80%.

As at the closing date of this report, the discretionary portfolio management service, *Cartera Sabadell* (Sabadell Portfolio), classified as an Art. 8 product under the SFDR, has 2,327 million euros in assets under management across over 18,600 portfolios.

Training on ESG investment aimed at all commercial team members who provide advisory services to customers continued to be imparted, and helpful information sheets were created for customers to clarify any doubts they might have about the key concepts in relation to their sustainability preferences (Taxonomy, SFDR and Principal Adverse Impacts).

The Banco Sabadell Policy on Integrating ESG Risks in Savings/ Investment Products was updated in 2025 with the latest progress made in that regard. This Policy is framed within Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector.

It is important to emphasise that 2025 saw a continuation of the work that began in 2022 of incorporating customers' sustainability preferences into discretionary portfolio management and advice models, which were adapted to the suitability guides published in 2023. Lastly, the Institution's third **Principal Adverse Impacts Report** (available in Spanish) was published in 2025. This report shows whether investment decisions have had an impact on the environment, social aspects and corporate governance, according to various regulatory indicators. This report is

¹³ Article 8 of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (known as SFDR), which governs transparent promotion of environmental or social characteristics in pre-contractual disclosures and transparency of sustainable investments in pre-contractual disclosures, respectively.

¹⁴ Articles 8 and 9 of Regulation (EU) 2019/2088 of the European Parliament and of the Council.

available to customers and non-customers, and the 2024 report is the first one that shows how the indicators have evolved over three years.

Retirement products

In relation to BanSabadell Pensiones, over the years it has taken several actions to promote the development of socially responsible investment among pension plans, and it was one of the first institutions to offer a pension plan that invests in ethical projects and charitable assistance, which in addition to investing with socially responsible criteria, makes donations to finance the chosen projects. As at 31 December 2025, BanSabadell Pensiones manages nine pension funds that explicitly incorporate a Socially Responsible Investment (SRI) mandate in their investment policy, with assets of 1,024.8 million euros.

In terms of the integration of sustainability risks in the investment decisions of Sabadell Seguros, the asset management process includes quantitative and qualitative ESG criteria. To this end, ESG ratings issued by specialised ESG rating agencies are used. These allow the risks and opportunities associated with short- and long-term investments to be identified. Certain tools are also used in the process that detect reputational alerts related to the companies and assets that form part of its investments. In addition, it is worth noting that exclusion policies are applied, meaning that it does not invest in controversial sectors (weapons, thermal coal, etc.). To analyse sustainability risk controls in investment portfolios, the ESG Footprint Committee was created, which is responsible for supervising sustainability risks and verifying the correct implementation of the sustainability risk policy by each investment manager.

9

Funds *BanSabadell Pensiones*

1,024.8M€

Assets at 31 December 2025

Insurance products

Sabadell Seguros has been a participant of the Q-Impact fund since July 2021, in order to contribute to the global challenge of energy transition and create professional opportunities for vulnerable groups.

Q-Impact invests in companies in growth or expansion stages that mitigate issues linked both to social inclusion and to the green transition in Spain. In the social sphere, the fund focuses primarily on companies that help young people to find employment, those that reduce unemployment among young people, those that work to improve the inclusion of people with functional diversity and vulnerable groups, and those that improve the lives of people with functional diversity and the elderly through adapted products and remote assistance services. In relation to the green transition, the fund focuses on acting as a catalyst for investment in underserved markets, as well as focusing on organic agriculture, sustainable technology and related sectors, such as the generation of renewable energy on islands and the financing of self-consumption and energy efficiency.

As at September 2025, the Q-Impact fund had obtained the following results: in its financial valuation, it reached an Internal Rate of Return (IRR) of 14.2%; as for its social and environmental impact, since Q-Impact became involved with each company, the investment-weighted impact metrics recorded 110% growth as at September 2025. All companies have improved their impact, with Green Home Finance emerging as the growth leader.

In terms of protection insurance, the aim of companies is to promote the development of products and services that create social value and foster environmental protection.

The home insurance product offers coverage for accidental breakages of the sheets of glass of any solar panels that they have installed and which are fixed to the fabric of the building of their homes and for their exclusive use. Any charging points for electric vehicles installed and fixed in their (owned) garage are also considered part of the fabric of the building.

The vehicle insurance product offers special coverage for electric vehicles, such as roadside assistance in the event of a breakdown, accident or low battery; coverage for the theft of the charging cable or plug; as well as coverage for damages to third parties caused by faults when charging the vehicle (with the Civil Liability coverage).

Additionally, the new health insurance product for the elderly, *Protección Salud Más60* (Over 60s Health Coverage), designed to complement Social Security, makes access to general and specialist medical care easier, offering swift, quality private healthcare with digital options. At an affordable price, it promotes the social inclusion of people over 60, a group at greater risk of vulnerability and often excluded from the market due to the high cost of traditional insurance.

Similarly, travel has become less frequent, consequently reducing greenhouse gas emissions, thanks to video valuations in Vehicle Protection and Home Protection insurance and 24-hour video consultations in Health Protection provided by Sanitas.



1.4.5 Issuance of Banco Sabadell sustainability instruments

Since 2020, Banco Sabadell has had a Framework for the Issuance of Sustainability Bonds linked to the Sustainable Development Goals (SDGs), which serves as the reference document for the issuance of green, social and sustainability instruments, in different formats, including public and private issues. In 2024, Banco Sabadell published an updated Framework. This update was driven by developments in the sustainable finance regulation and by the Bank's ambitious social and environmental strategy. The Framework applies the substantial contribution criteria proposed in the EU Taxonomy for the defined categories of green eligible projects and complies with the voluntary guidelines of the International Capital Market Association (ICMA).

- **Green instruments** are intended to finance eligible green project categories, focusing on projects with environmental benefits, such as reduction of greenhouse gas emissions, pollution prevention and climate change adaptation.
- **Social instruments** are designed to finance eligible social project categories, focusing on the generation of social benefits by providing access to essential services, facilitating social inclusion and promoting the generation and maintenance of employment.
- **Sustainability instruments** are aimed at providing finance for a combination of green and social activities, as described above.

The net proceeds obtained by issuing these types of instruments (or the collateral amount of the financial guarantees placed on the market) are used to finance or refinance all or part of the new or existing loans or projects that meet the eligibility criteria established in the Framework.

Since 2020, Banco Sabadell has issued ten green bonds and one green synthetic securitisation of a project finance portfolio. As at year-end 2025, the outstanding balance of Banco Sabadell's eight green bond issuances amounts to 3,695 million euros, and the outstanding balance of the synthetic securitisation of green eligible projects is 78.8 million euros, corresponding to the tranche placed with third parties.

Based on that provided in the Framework, a report was prepared, for the green instruments issued in 2024, on the allocation of proceeds to eligible projects and the environmental impact generated by those projects. The report was reviewed by an independent expert. The report is available on the corporate website under the heading [Green Instruments Report 2025](#), alongside the reports for previous years.

1.4.6 Sinia Renovables

As at 2025 year-end, Sinia Renovables, Banco Sabadell's division for investment in renewable energies and sustainability, has investments in projects under development, construction or in operation with an overall installed capacity of 1,264 MW, equivalent to the electricity consumption of about 926,437 households. Of this capacity, the portion attributable to Sinia through its direct shareholding is 296.9 MW, equivalent to the generation of 563.2 GWh of sustainable electricity every year. This generation, if all projects were in operation, would be equivalent to preventing the emission of 159,381 tonnes of CO₂ per year to satisfy the average annual consumption of around 172,123 households¹⁵.

Four years ago, Sinia launched its Alternative Green Equity Solution, which is a hybrid financial product that offers solutions to real estate developers with limited ability to obtain funding. They have good renewable energy projects that are almost Ready to Build but they are ultimately unable to complete construction and so they become Independent Power Producers (IPPs).

1,264^{MW}

Renewable energies

296,9^{MW}

Sinia through its direct shareholding

172,123

Households

**As at the end of 2025, Sinia Renovables
had mobilised more than 47.5 million euros,
between invested capital and financing.**

These figures position the Group as one of the leaders of the financial sector when it comes to investing in renewable energy and sustainability projects, backed by its 25 years of activity in the sector.

Details of the main achievements of Sinia Renovables as at the end of the year are given here below:

- Sinia is a developer supporting other developers: in 2025, it increased the share of projects in operation by more than 17 percentage points (44.6% of the portfolio is now in this phase, compared to 27% in 2024). This is because Sinia has a multi-disciplinary team specialised in finance, management and engineering for this type of asset.
- In Spain, Sinia is active in 12 of the 19 autonomous communities/cities, combining knowledge about each of their unique social, economic, environmental and regulatory characteristics.
- International locations represent 22.6% of the power held in the portfolio: Sinia has sizeable investments in wind energy projects in operation in Mexico equivalent to 250.49 MW installed capacity, in the Tamaulipas region. In France, it is co-investing in the development of a 15.4 MW wind power plant.
- Active in biomethane: a power plant is being built in Salamanca this year, with capacity for 27 GWh of biomethane and financing of 8.1 million euros.
- Stakes in specialised sustainability holdings: one example of this is the minority interest held by Sinia in Soluciones y Desarrollos de Ingeniería y Servicios (Sydis), which has almost doubled its portfolio to 238.4 MW distributed across 52 projects. Another example is Sinia's minority interest in the Greening Group, which currently has a portfolio of 67 projects totalling 245.3 MW across Spain, Mexico and Italy at different stages of maturity.
- Another noteworthy development in 2025 was the launch of two wind projects with an installed capacity of nearly 100 MW, developed by Energías Renovables del Bierzo (Erbienergía), with which Sinia has an established relationship spanning over 20 years and contributed to these projects through subordinated loans.

¹⁵ The conversion factor has been calculated based on the CNMC with the equivalent of 0.283 t CO₂/MWh (see gdo.cnmc.es/CNMC/accesoEtiquetado.do – in Spanish) and based on the Smart Consumption Guide published by REE (Spain's national electricity grid operator) of 3,272 kWh per year/home in Spain.

1.4.7 BStartup

Banco Sabadell's BStartup is a financial service for startups. It provides these companies with a 360° service of specialised banking and equity investment.

Banco Sabadell's BStartup is a financial service for startups (innovative companies that sell products and/or services through the use of technology, with a scalable business model that permits rapid and continued growth) and for scaleups (companies with traction and with turnover and/or investment in excess of €1m). It provides these companies with a 360° service of specialised banking and equity investment.

As at 2025 year-end, BStartup had 6,064 startup customers. These are very internationalised customers that frequently engage in complex operations that require highly specialised managers and services, which are offered through a distribution model comprised of 26 managers dedicated exclusively to startups and scaleups in the Territorial Divisions with the highest concentration of this type of companies, over 13 mixed managers, its own 5-member risk team and a team of 4 specialists that drive the business throughout Spain.

In terms of equity investment, it is aimed mainly at early-stage digital and technology companies with strong growth potential and scalable, innovative business models. In 2025, €1,000,000 were invested in six startups.

BStartup invests in all types of sectors, but mostly focuses on two specific verticals:

- BStartup Green, to invest in startups that use technology or digitalisation to facilitate the transition to a more sustainable world (from the point of view of the energy transition, industry 4.0, smart cities and the circular economy).
- BStartup Health, the programme designed to support health projects, in which invested funds are primarily used to validate the technology, research and business model. In 2025, it launched the eighth call for proposals and, for the first time this year, it received support from the leading healthcare investment funds in the country, reaching a record 201 companies analysed.

In 2025, BStartup has taken a very active role in the main events of the entrepreneurial ecosystem. BStartup's team actively participated in 128 entrepreneurial events held throughout Spain.

BStartup Hub Madrid, the first Banco Sabadell branch dedicated exclusively to startups, scaleups and their investors, celebrated its first year. It is an entrepreneurial and technological hub with a team of 12 people who offer a 360° financial service that is 100% specialised in startups. The space was also designed to serve as a meeting point for Madrid's entrepreneurial ecosystem, featuring an auditorium, meeting rooms and hot desks for customers. In its first year, it hosted 59 events (both its own and organised by the entrepreneurial ecosystem) with more than 3,400 attendees.

1.4.8 Green financing and lines of credit with multilateral development banks in Mexico

Green financing

In 2025, Banco Sabadell Mexico granted green financing in the amount of approximately €180m.

The economic sectors that received green financing include consumer goods (33% weight), electricity, gas & water (28% weight), Commercial Real Estate (CRE) (19% weight), construction (9% weight), food and beverages (4% weight), paper and timber (6% weight), and manufacturing (1% weight).

The purpose of the financing encompassed both Green and Social Loans (GSLs), such as those for electricity generation through solar photovoltaic technology, and Sustainability-Linked Loans (SLLs), which are linked to indicators including a reduction in the volume of water consumption; upgrades to equipment to optimise energy efficiency; comprehensive management measures to obtain sustainable building certification¹⁶; procurement of certified raw materials from forests managed in a sustainable and responsible way; waste-reduction initiatives or installation of solar panels; greater number of women in leadership positions; use of hybrid and electric vehicles; and use of clean energy sources.

In addition, work on the environmental and social analysis continues, to reduce financing granted to the following sectors that have a particularly negative impact on the environment: Mining, Energy, Agro-industry, Infrastructures and Defence.

Lines of credit with multilateral development banks

Since 2019, Banco Sabadell Mexico has had access to a 10-year line of credit of US\$100m granted by the International Finance Corporation (IFC), a member of the World Bank Group, to promote the development of sustainable tourism and construction in Mexico. These funds are granted to customers seeking to promote the development of sustainable projects.

Banco Sabadell Mexico also has an 8-year credit facility in the amount of US\$50m with the German Development Finance Institution (DEG, by its German acronym).

As part of the agreements with the IFC and the DEG, Banco Sabadell Mexico prepares and submits to them an Annual Report on Environmental and Social Performance, which describes the implementation and operation of its Environmental and Social Risk Management System (SARAS, by its Spanish acronym), as well as the environmental and social performance of customers to whom this system was applied in the previous tax year.

Since 2021, all infrastructure projects (new builds and extensions), as well as any hotel-related operation that has received finance of

¹⁶ In line with international standards such as LEED, BOMA and EDGE. This process requires the implementation of strategies for energy efficiency, carbon footprint reduction, resource optimisation and occupational welfare.

US\$5m or more, are evaluated using SARAS in order to identify their environmental and social impacts and risks. At the end of these evaluations, an Action Plan is drawn up designed to help mitigate the identified impacts and risks, which the customer undertakes to carry out.

During 2025, 16 transactions were evaluated, encompassing the following sectors: Hotels, Food and beverages, Manufacturing industries, Agro-industry and Real Estate.

As part of the SARAS implementation, Banco Sabadell Mexico was selected by the Spanish Chamber of Commerce in Mexico (CAMESCOM) as the winner of the 2025 edition of the “*Reconocimiento de Sostenibilidad*” sustainability award, which promotes and recognises the commitment of its member companies to the environment and sustainable development.

In 2025, Banco Sabadell Mexico added a Sustainability section to its official website, reaffirming its commitment to transparency and corporate responsibility. Initially, it published its Environmental and Social Policy, the entity’s list of excluded activities and sectors, and a description of the environmental and social management of its portfolio of customers.





2. Environmental information

Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)

EU Taxonomy

The European Union took a further step as promoter of the energy transformation and the decarbonisation of the economy. In line with the objectives of the fight against climate change, it established the Taxonomy Regulation (Regulation (EU) 2020/852), which was the first step towards obliging firms to disclose the proportion of their activities that are considered green or social, according to this regulation.

This regulation, which establishes requirements for the classification and reporting of sustainable activities, is a key aspect for the integration of ESG aspects into the Group's ordinary activity, as well as being a strategic aspect for the Institution. For this reason, it is regularly monitored by the Technical Risk Committee and the Sustainability Committee.

Banco Sabadell believes it is paramount to ensure that its portfolio is aligned with its decarbonisation targets and, to that end, it has included decarbonisation in its Risk Appetite Framework, in its policies and in its sectoral planning processes, and it has set pathways to achieve those targets.

- The Group has a framework for sectoral analysis through internal discussion, the **Sector Guidance Strategy (SGS)**, led together by the Research division and the Risk Management division, and with contributions by sectoral experts from Business, Risk Origination, Credit Risk Control and Sustainability. With this, the Group establishes a sectoral strategy based on analysis of the external context of each sector and the internal context. This analysis is cross-checked by the main units involved in the Bank, so that ESG risks are included in the sectoral discussion, together with other macroeconomic parameters. Accordingly, the Group defines its strategic positioning at the sub-sector level, setting its sectoral asset allocation strategy which is, in turn, incorporated in the financial planning process.
- Furthermore, the Bank has defined certain indicators and metrics in its **Risk Appetite Statement (RAS)** related to ESG and designed, on one hand, to monitor the status and evolution of physical and transition risks in its credit portfolio and, on the other hand, to establish and limit its risk appetite and/or position in certain environmental aspects. The RAS indicators include the decarbonisation targets established for 2030 for the sectors with the most intensive greenhouse gas emissions that are financed by the Bank, based on the targets established in the Paris Agreement and aligned with the UNEP FI's NZBA. Information regarding the monitoring of those pathways is included in the Corporate Sustainability Report, which is submitted on a regular basis to the governing bodies.
- Lastly, the **Environmental and Social Risk Framework** consolidates the set of applicable criteria that aim to limit the financing of customers or projects that are thought to be contrary to the transition to a sustainable economy or that lack alignment with international regulations or best practices in the industry.

Moreover, since 2020, Banco Sabadell Group has been working on its own Eligibility Guide, based on the EU Taxonomy and the best practices in the market, such as the Green Loan Principles and the Social Bond Principles. As this is a key and strategic aspect for the Bank, since 2020 work has been underway both to keep the Eligibility Guide and the Sustainable Financing Framework in line with regulatory updates, and to implement them in the operational systems.

As a result of this work, the Group's systems currently include a process for tagging priority green products, which allows the entire management cycle of those products to be traced and ensures their alignment with the requirements of the Bank's Eligibility Guide.

In Spain, the tagging of sustainable transactions is carried out through the Eligibility Guide, which is already implemented in the Bank's systems for all segments. Through this Guide, the Bank identifies and requires, for each sustainable purpose, documentation that demonstrates compliance with the substantial contribution criteria in accordance with that set forth in the European Taxonomy. To ensure the gathering of such documentation, automatic and manual controls have been implemented in the authorisation process of sustainable transactions.

In addition, the Do No Significant Harm (DNSH) criteria and the Minimum Social Safeguards (MSS) are reviewed centrally using the information provided by the counterparties.

Key Performance Indicators in the Taxonomy Regulation – Green Asset Ratio (GAR)

The Taxonomy Regulation lays down common harmonised criteria to determine which economic activities qualify as environmentally sustainable. In addition, Article 8 of this Regulation establishes the obligation for any undertaking subject to the Corporate Sustainability Reporting Directive (CSRD) and the Non-Financial Reporting Directive (NFRD) to publish information on how and to what extent the undertaking's activities are associated with economic activities that qualify as environmentally sustainable under the Taxonomy. Specifically, for non-financial undertakings, it establishes the requirement that they shall disclose the proportion of their turnover, capital expenditure (CapEx) and operating expenditure (OpEx) derived from this type of activity. In the case of financial institutions, this disclosure obligation translates into a key performance indicator, specifically the Green Asset Ratio (GAR).

Specifically, the requirements and disclosure templates for credit institutions are set out in Annexes V and VI, respectively, of Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021. In relation to the EU Taxonomy, on 4 July 2025 the European Commission adopted Commission Delegated Regulation (EU) 2026/73 under the ESG Omnibus package, amending, among other aspects, Commission Delegated Regulation (EU) 2021/2178 as regards the simplification of the content and presentation of information to be disclosed concerning environmentally sustainable activities, which significantly affects credit institutions as it simplifies the disclosure of the GAR.

Commission Delegated Regulation (EU) 2026/73 came into force on 1 January 2026 and is applicable as at the date of this 2025 report. However, that Regulation provides transitional arrangements under which firms can opt to continue applying the disclosure regime in effect as at 31 December 2025 for the financial year commencing 1 January and ending 31 December 2025. Furthermore, the Delegated Regulation clarifies that application of the indicators of the trading portfolio and fees, originally intended to enter into force this year, has been postponed to 2028 (reporting date December 2027). Banco Sabadell Group has opted to apply those transitional arrangements to its EU Taxonomy disclosures.

Application criteria for GAR disclosures

The GAR measures the Institution's assets that finance or are invested in economic activities that meet the Taxonomy's technical screening criteria for the six environmental objectives as a proportion of the total eligible balance (the total balance excludes sovereign exposures, exposures to central banks and the trading book). An activity is deemed to be Taxonomy-aligned where it is an eligible activity, in the sense that it could potentially contribute to one or more of the six environmental objectives set out in the Taxonomy and where, additionally, it meets the following technical screening criteria: it contributes substantially to one or more of the six environmental objectives, the activity does not significantly harm any of the environmental objectives, and the activity is carried out in compliance with the minimum social safeguards in relation to human rights. Financial institutions first started disclosing this ratio in 2023.

For an economic activity to be considered eligible, it must feature in the delegated acts developed by the European Taxonomy according to the environmental objective, irrespective of whether that activity does not meet all of the technical screening criteria set forth in those delegated acts or whether it ultimately does not qualify as environmentally sustainable (aligned). There are six environmental objectives: (1) Climate change mitigation, (2) Climate change adaptation, (3) Protection and restoration of biodiversity and ecosystems, (4) Pollution prevention and control, (5) Transition to a circular economy, and (6) Sustainable use and protection of water and marine resources. It is mandatory for financial institutions to disclose finance granted for eligible and Taxonomy-aligned economic activities in relation to all objectives from 2025 year-end onwards.

The Group determines whether the contribution of the specific finance in question qualifies as substantial according to the technical screening criteria set out in the Taxonomy. The Group is also making every effort to ensure compliance with the DNSH and MSS criteria. Available information and market practices in relation to alignment with DNSH and MSS are constantly changing, making it difficult to provide evidence of full compliance therewith in accordance with prevailing legislation. That is why the Group, unable to ensure strict compliance with the DNSH and MSS principles, has not included a portion of the finance in the Taxonomy-aligned values in certain cases. In any event, to demonstrate compliance with the DNSH principle and to show that the activity is carried out in accordance with the Minimum Social Safeguards

(MSS) for certain exposures, the Group relies on the information disclosed by the institutions, verifying, for the specific financed activity, compliance with the DNSH principle and the MSS in the Taxonomy tables disclosed by counterparties subject to the CSRD.

This year, for the first time, the Group has amended the criteria used to evaluate the alignment of its portfolios of retail mortgages and consumer loans for vehicle purchase, ceasing its application of the simplified approach provided in Commission Implementing Regulation (EU) 2022/2453 of 30 November 2022, under which only fulfilment of the substantial contribution criteria based on energy efficiency is considered.

Under the substantial contribution criteria, within retail mortgages, the associated financing transactions are considered to be Taxonomy-aligned when it can be demonstrated that (i) they have an energy performance rating of A or B, (ii) the primary energy demand is at least 10% below the threshold established for nearly zero-energy buildings, according to the Technical Building Code (CTE), for each climate zone, and (iii) for buildings of more than 5,000m², there is evidence of air-tightness, thermal integration, as well as a calculation of the global warming potential. Furthermore, since 2025, in the case of new builds, the building's existing energy performance certificate has been considered as the energy performance certificate of those of its housing units that only have an inferred energy performance rating, given that they share the same energy efficiency class (represented by a letter) and the same consumption and emissions values per square metre.

In addition, in 2025, the criteria for the application of the DNSH criterion to the retail mortgages portfolio have been revised, so that verification is now based on the assessment of the real estate collateral item's physical risk stemming from climate change, according to the Institution's calculation approach. Under this new approach, only loans granted for the acquisition and ownership of buildings meet the DNSH principles, provided that the transactions have no high or very high exposure to physical risks. Similarly, in relation to minimum social safeguards, the Institution follows the recommendations of the Platform on Sustainable Finance¹⁷.

In the case of consumer loans for vehicle purchase, the technical screening criteria concerning substantial contribution are analysed based on the vehicle's zero-emissions energy efficiency and the minimum safeguards under the approach mentioned above. However, given the difficulty involved, it has not been possible to verify the compliance of motor vehicle loans with the DNSH principles, meaning that this portfolio is considered as not aligned with the EU Taxonomy.

The perimeter used to calculate the GAR, in accordance with Commission Delegated Regulation (UE) 2021/2178, is the prudential scope of the consolidated Group, such that intragroup exposures outside of the prudential scope of consolidation are considered third-party exposures. In addition, the GAR is calculated for the existing stock as at a specific disclosure reference date and also for the flow of new exposures (with a transaction or contract start date occurring over a 12-month period), which gives an idea of how the Institution is transitioning towards sustainable economic activities and also of how it is helping its counterparties in their transition and adaptation pathway.

¹⁷ Final Report on Minimum Safeguards (October 2022).

The numerator considers the gross carrying amount of the assets aligned with the Taxonomy's six environmental objectives; these include loans and advances, debt securities, as well as equity instruments not held for trading or sale, making a distinction between:

- Exposures to financial corporations, including exposures to credit institutions and other financial corporations within the European Union (EU).
- Exposures to (EU) non-financial corporations subject to NFRD¹⁸ disclosure requirements, i.e. with over 500 employees on average during the year, considering, in the case of firms that belong to a group, the number of employees in their corporate group, with a balance sheet of over 25 million euros or turnover above 50 million euros.
- Households, which include home equity loans, building renovation loans and consumer loans for vehicle purchase. In the case of mortgages granted to retail customers, the Bank's total perimeter is considered, regardless of whether or not the property is located in the EU, and irrespective of whether or not the obligor is a citizen of an EU Member State.
- Local governments, including finance for public housing and other specialised lending.
- Collateral obtained by taking possession: residential and commercial immovable properties (foreclosed).

In addition, the purpose of the finance granted to the counterparty should be considered, making a distinction between whether the purpose is to finance their general activity or whether the finance is being sought for a specific purpose:

- **Finance for generic purposes or for unknown purposes**, where exposures are included provided the counterparty's activity is aligned with the economic activities defined in the Taxonomy. This is in turn determined based on the key performance indicators published by the counterparties in relation to their turnover, capital expenditure (CapEx) and operating expenditure (OpEx). Non-financial corporations were required to publish their key alignment indicators for all environmental objectives as at 2024 year-end, whereas financial institutions were required to publish that data as at 2025 year-end, as in previous years they were only required to disclose data for the climate change mitigation and adaptation objectives.
- **Finance for specific purposes**, where exposures are included based on the information provided by the counterparties concerning the project or activities that meet the defined environmental standards and for which the funds will be used.

The denominator considers the gross carrying amount of the Institution's total assets, excluding exposures to central governments and to central banks and the trading book. This way, in addition to the numerator's total exposure, the denominator includes several types of exposures that are excluded from the numerator, such as non-financial corporations not subject to the NFRD and based both inside and outside the EU (the vast majority of SMEs), non-financial corporations and financial corporations based outside the EU, derivatives, interbank deposits, cash and other assets (goodwill, tangible assets, tax assets, etc.). It is important to note that this asymmetrical perimeter between the assets eligible for inclusion in the ratio's numerator and those eligible for its denominator means, in practice, that the GAR is defined as though all exposures not eligible to be considered in the numerator had 0% alignment with the Taxonomy.

On the other hand, it is worth noting that the metric used concerning the gross carrying amount of assets meets the disclosure requirements laid down in the EU Taxonomy, and this results in a difference from the metric used in the accounting records, which corresponds to the net amount after deducting any loss allowance, which is why the carrying amount of total assets reflected for such purposes in the GAR is greater than the one included in the Group's public balance sheet.

¹⁸ The standard and existing limits under Law 11/2018 are considered, as the CSRD has not been transposed into Spanish law.

Furthermore, as a previous step to calculating the GAR, Taxonomy-eligible exposures are identified using the following criteria:

- Loans to non-financial corporations/financial institutions: these qualify as eligible or not, according to the known or unknown purpose of the funds. Where the purpose of the finance is known or specific and makes a substantial contribution in accordance with Taxonomy criteria, 100% of the exposure is deemed eligible, and in the case of finance for generic purposes, the publicly-available eligibility information (key performance indicators) of the counterparties is used to determine the eligible exposure.
- Retail mortgage loans: all exposures to individuals secured with a first or second property are deemed eligible, as the purpose of these loans is included within the EU Taxonomy.
- Motor vehicle loans: all vehicle financing exposures are deemed eligible, as this purpose is included within the EU Taxonomy.
- Foreclosed assets: 100% of the exposure is deemed eligible, as this purpose is included within the EU Taxonomy, similar to mortgage loans.

Calculation approach

In accordance with the guidelines set forth in Commission Delegated Regulation (EU) 2021/2139 and Commission Delegated Regulation (EU) 2023/2486, which supplement Regulation 2020/852, the Group has included those exposures that are aligned according to the requirements of the EU Taxonomy for the six environmental objectives within its GAR.

To that end, a distinction is made between two allocation or tagging methodologies:

- **Finance for specific purposes or uses:** This includes specific finance granted by Sabadell that substantially contributes to an environmental objective and meets the DNSH and MSS criteria, in which case 100% of the exposure is reported as aligned. The information published by the counterparties on DNSH and MSS in their corresponding NFDRs is considered in order to assess compliance with these criteria. Where no such DNSH and MSS information is disclosed by the counterparty, given that the Group cannot ensure strict compliance with these principles, the associated loan is not reported as an aligned exposure.

In addition, as mentioned earlier, the exposure of loans secured with real estate granted to households for the purchase of homes with the most efficient EPC ratings and which meet DNSH criteria are thought to be Taxonomy-aligned. In the case of foreclosed assets, their alignment is not disclosed.

- **Finance for generic purposes or for unknown purposes:** This refers to cases where the Institution grants finance to counterparties for generic purposes, i.e. without the funds having a specific goal other than to manage the company's liquidity, cash or usual activities. As indicated in Annex V of Royal Decree 2021/2178, credit institutions should, in this case, use the key performance indicators related to CapEx and turnover disclosed by the counterparties themselves for each environmental objective, with no need for any additional verifications to ensure alignment with the Substantial Contribution (SC), DNSH and MSS criteria.

This way, the exposure reported as being EU Taxonomy-aligned corresponds solely and exclusively to the exposure with counterparties that have disclosed the degree of their activity's alignment with the EU Taxonomy in terms of either turnover or CapEx in their non-financial disclosure reports.

To that end, it is worth noting that the Institution has gathered counterparties' eligibility and alignment information by means of a project, conducted in a coordinated manner and at a sectoral level with a reputable third party, which compiled and unified the information of counterparties subject to the NFRD that have disclosed information in their corporate reports, NFDRs or equivalent

(the data of firms that have not published their KPIs has not been reported, in other words, the counterparties with no reported KPIs are considered to have 0% alignment in terms of both their turnover and CapEx; no KPIs have been estimated either). The data obtained, mainly at the level of consolidated groups, has been applied to their generic exposures, for both the parent companies and their subsidiaries, always provided the intended use of the funds is for generic purposes, weighting counterparties' exposure by their degree of alignment in percentage terms (turnover or CapEx, depending on the reporting template).

It is worth mentioning that Bloomberg is used as a supplier to identify green bonds that promote climate change mitigation or adaptation, as well as bonds linked to sustainability projects, and to determine whether they meet the technical screening criteria that make them qualify as Taxonomy-aligned. In addition, the Institution relies on this supplier to obtain the exposures that are eligible and aligned with the environmental objectives of the portfolio of Assets under Management (AuM). Specifically, every month the Institution shares its AuM data and Bloomberg applies various levels of data extraction to determine the final investment of those positions and report on their various KPIs. The information is the actual data reported by companies in which that position is invested and no estimates are used. This year, eligibility and alignment information is disclosed for all of the EU Taxonomy objectives.

Based on the foregoing, Banco Sabadell Group presents in this report ([Taxonomy Indicators](#)) the specific templates for credit institutions as at the end of 2025, whose information has been prepared in accordance with Annex V of Commission Delegated Regulation (EU) 2021/2178 under the disclosure regime in effect as at 31 December 2025, based on the transitional arrangements provided in Article 4 of Commission Delegated Regulation (EU) 2026/73. Similarly, Templates 6 (Fees & Commissions) and 7 (Trading Book) of Annex VI are not included, in light of the clarification published by the European Commission in connection with Taxonomy disclosures¹⁹.

The templates specific to credit institutions are used, as that is the primary activity of Banco Sabadell Group, and these include the information of the entire scope of prudential consolidation, determined in accordance with Regulation (EU) 575/2013. The Group's scope of prudential consolidation does not include any entity operating in the investment services or insurance activities segments. In the scope of consolidation, Urquijo Gestión S.G.I.I.C. is included within asset management services, and it is not materially representative in terms of the Group's total assets.

In relation to the perimeter used for the GAR, it is worth noting that, due to the agreement to sell TSB Banking Group plc (hereinafter, TSB) to Banco Santander, S.A., as from 1 July 2025 the exposure of this company has been recognised in the accounts under "Non-current assets and disposal groups held for sale". As a result, this exposure is no longer considered in terms of its alignment with the EU Taxonomy, as it forms part of the total GAR assets under the "Other assets" line item.

¹⁹ Draft Commission Notice on the interpretation and implementation of certain legal provisions of the Disclosures Delegated Act under Article 8 of the EU Taxonomy Regulation, as amended by the Omnibus Delegated Act, on the reporting of Taxonomy-eligible and Taxonomy-aligned economic activities and assets (fourth notice).

Results

As at December 2025, Banco Sabadell Group had a GAR of 2.26% in terms of turnover, with the ratio falling compared to December 2024 (4.43%), mainly due to the impact of the sale of TSB. Considering only the Banco Sabadell excl. TSB perimeter, the GAR would come to 3.07% in terms of turnover (vs 2.11% Dec. 2024).

In terms of the denominator, total GAR assets have increased by 8,172 million euros over the year, mainly due to the growth of the loan book.

As for the exposures aligned with the EU Taxonomy, these posted an annual decrease of -3,882 million euros, mostly concentrated in Households, fundamentally due to the agreement to sell the subsidiary TSB, whose aligned assets are no longer considered as at the end of 2025. In the Banco Sabadell excl. TSB perimeter, aligned exposures increased by 1,452 million euros, mainly in Non-financial corporations and Households, driven by the year-on-year growth of lending and as a result of various initiatives implemented to strengthen the control framework over the tagging of sustainable exposures and to improve data quality.



Taxonomy indicators

0. Summary of GAR KPIs in relation to turnover and CapEx KPIs

Summary of GAR KPIs in relation to **turnover** KPIs

Disclosure reference date 31/12/2025

		Total environmentally sustainable assets	KPI ²⁰	KPI ²¹	% coverage (over total assets) ²²	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2 of Annex V) ²³	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V) ²⁴
Main KPI	Green Asset Ratio (GAR) stock	4,410	2.26%		78.74%	41.33%	21.26%

Disclosure reference date 31/12/2025

		Total environmentally sustainable assets	KPI ²⁰	KPI ²¹	% coverage (over total assets) ²²	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2 of Annex V) ²³	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V) ²⁴
Additional KPIs	GAR (flow)	1,268	2.24%		81.77%	35.33%	18.23%
	Trading book						
	Financial guarantees	9	1.10%				
	Assets under management	771	13.10%				
	Fees and commissions income						

Disclosure reference date 31/12/2024

		Total environmentally sustainable assets	KPI ²⁰	KPI ²¹	% coverage (over total assets) ²²	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2 of Annex V) ²³	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V) ²⁴
Main KPI	Green Asset Ratio (GAR) stock	8,292	4.43%		77.19%	25.72%	22.81%

Disclosure reference date 31/12/2024

		Total environmentally sustainable assets	KPI ²⁰	KPI ²¹	% coverage (over total assets) ²²	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2 of Annex V) ²³	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V) ²⁴
Additional KPIs	GAR (flow)	1,914	3.59%		82.05%	31.85%	17.95%
	Trading book						
	Financial guarantees	8	1.01%				
	Assets under management	96	2.03%				
	Fees and commissions income						

Summary of GAR KPIs in relation to CapEx KPIs

Disclosure reference date 31/12/2025

		Total environmentally sustainable assets	KPI ²⁰	KPI ²¹	% coverage (over total assets) ²²	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2 of Annex V) ²³	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V) ²⁴
Main KPI	Green Asset Ratio (GAR) stock	5,549	2.84 %		78.74 %	41.33 %	21.26 %

Disclosure reference date 31/12/2025

		Total environmentally sustainable assets	KPI ²⁰	KPI ²¹	% coverage (over total assets) ²²	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2 of Annex V) ²³	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V) ²⁴
Additional KPIs	GAR (flow)	1,731	3.06 %		81.77 %	35.33 %	18.23 %
	Trading book						
	Financial guarantees	9	1.05 %				
	Assets under management	1,222	20.76 %				
	Fees and commissions income ²⁵						

Disclosure reference date 31/12/2024

		Total environmentally sustainable assets	KPI ²⁰	KPI ²¹	% coverage (over total assets) ²²	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2 of Annex V) ²³	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V) ²⁴
Main KPI	Green Asset Ratio (GAR) stock	8,762		4.68 %	77.19 %	25.72 %	22.81 %

Disclosure reference date 31/12/2024

		Total environmentally sustainable assets	KPI ²⁰	KPI ²¹	% coverage (over total assets) ²²	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2 of Annex V) ²³	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V) ²⁴
Additional KPIs	GAR (flow)	1,999		3.75 %	82.05%	31.85%	17.95%
	Trading book						
	Financial guarantees	4		0.50 %			
	Assets under management	66		1.40 %			
	Fees and commissions income ²⁵						

²⁰ Based on the counterparty's turnover KPI.

²¹ Based on the counterparty's CapEx KPI, except in the case of loan activities for which, in relation to general loans, the turnover KPI is used.

²² % of assets covered by the KPI over banks' total assets Gross carrying amount of exposures of total GAR assets over gross carrying amount of total assets.

²³ Gross carrying amount of exposures not eligible for GAR calculation over gross carrying amount of total assets.

²⁴ Gross carrying amount of exposures not covered by GAR calculation over gross carrying amount of total assets.

²⁵ Fees and commissions income from services other than lending and assets under management.

1. Assets used to calculate the GAR in relation to turnover and CapEx KPIs

Assets used to calculate the GAR in relation to **turnover** KPIs

		Total gross carrying amount	Disclosure reference date 31/12/2025													
			Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
			Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)					
				Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which adaptation			Of which specialised lending	Of which adaptation		
Million EUR																
GAR – Covered assets in both numerator and denominator																
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	92,165	50,746	4,394	2,480	426	639	41	6	0	4	6	2	0	0	
2	Financial corporations	15,269	2,110	200	0	21	24	7	1	0	0	1	0	0	0	
3	Credit institutions	13,672	1,808	187	0	18	20	6	1	0	0	0	0	0	0	
4	Loans and advances	11,257	1,667	177	0	16	18	6	1	0	0	0	0	0	0	
5	Debt securities, including UoP	2,392	136	10	0	2	2	0	0	0	0	0	0	0	0	
6	Equity instruments	24	4	0		0	0	0	0		0	0	0		0	
7	Other financial corporations	1,596	302	13	0	3	4	0	0	0	0	0	0	0	0	
8	of which investment firms	1,509	281	11	0	3	4	0	0	0	0	0	0	0	0	
9	Loans and advances	1,245	267	9	0	3	4	0	0	0	0	0	0	0	0	
10	Debt securities, including UoP	150	12	2	0	0	0	0	0	0	0	0	0	0	0	
11	Equity instruments	113	2	0		0	0	0	0		0	0	0		0	
12	of which management companies	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
13	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
14	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
15	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	
16	of which insurance undertakings	87	21	2	0	0	0	0	0	0	0	0	0	0	0	
17	Loans and advances	53	21	2	0	0	0	0	0	0	0	0	0	0	0	
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
19	Equity instruments	35	0	0		0	0	0	0		0	0	0		0	
20	Non-financial corporations (subject to NFRD disclosure obligations)	24,116	5,318	2,524	809	405	615	34	5	0	4	5	2	0	0	
21	Loans and advances	23,859	5,135	2,429	809	405	519	34	5	0	4	5	2	0	0	
22	Debt securities, including UoP	256	183	95	0	0	95	0	0	0	0	0	0	0	0	
23	Equity instruments	0	0	0		0	0	0	0		0	0	0		0	
24	Households	51,527	43,298	1,670	1,670	0	0	0	0	0	0	0	0	0	0	
25	of which loans collateralised by residential immovable property	39,393	39,393	1,670	1,670	0	0	0	0	0	0	0	0	0	0	
26	of which building renovation loans	1,318	1,318	0	0	0	0	0	0	0	0	0	0	0	0	
27	of which motor vehicle loans	2,587	2,587	0	0	0	0	0	0	0	0	0	0	0	0	
28	Local government financing	1,254	20	0	0	0	0	0	0	0	0	0	0	0	0	

			Disclosure reference date 31/12/2025												
			Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)			
29	Housing financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0
30	Other local government financing	1,254	20	0	0	0	0	0	0	0	0	0	0	0	0
31	Collateral obtained by taking possession: residential and commercial immovable properties	755	755	0	0	0	0	0	0	0	0	0	0	0	0
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	102,638	0	0	0	0	0	0	0	0	0	0	0	0	0
33	Financial and non-financial corporations	35,870	0	0	0	0	0	0	0	0	0	0	0	0	0
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	27,094	0	0	0	0	0	0	0	0	0	0	0	0	0
35	Loans and advances	26,946	0	0	0	0	0	0	0	0	0	0	0	0	0
36	of which loans collateralised by commercial immovable property	4,522	0	0	0	0	0	0	0	0	0	0	0	0	0
37	of which building renovation loans	0	0	0	0	0	0	0	0	0	0	0	0	0	0
38	Debt securities	35	0	0	0	0	0	0	0	0	0	0	0	0	0
39	Equity instruments	113	0	0	0	0	0	0	0	0	0	0	0	0	0
40	Non-EU country counterparties not subject to NFRD disclosure obligations	8,775	0	0	0	0	0	0	0	0	0	0	0	0	0
41	Loans and advances	8,774	0	0	0	0	0	0	0	0	0	0	0	0	0
42	Debt securities	0	0	0	0	0	0	0	0	0	0	0	0	0	0
43	Equity instruments	1	0	0	0	0	0	0	0	0	0	0	0	0	0
44	Derivatives	1,086	0	0	0	0	0	0	0	0	0	0	0	0	0
45	On-demand interbank loans	744	0	0	0	0	0	0	0	0	0	0	0	0	0
46	Cash and cash-related assets	629	0	0	0	0	0	0	0	0	0	0	0	0	0
47	Other assets (goodwill, commodities, etc.)	64,311	0	0	0	0	0	0	0	0	0	0	0	0	0
48	Total GAR assets	195,559	51,501	4,394	2,480	426	639	41	6	0	4	6	2	0	0
49	Assets not covered for GAR calculation	52,794	0	0	0	0	0	0	0	0	0	0	0	0	0
50	Central governments and supranational issuers	38,567	0	0	0	0	0	0	0	0	0	0	0	0	0
51	Exposures to central banks	11,032	0	0	0	0	0	0	0	0	0	0	0	0	0
52	Trading book	3,194	0	0	0	0	0	0	0	0	0	0	0	0	0
53	Total assets	248,353	51,501	4,394	2,480	426	639	41	6	0	4	6	2	0	0
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations															
54	Financial guarantees	834	161	9	8	0	2	2	0	0	0	1	0	0	0
55	Assets under management	5,887	2,062	683	0	73	397	127	20	0	5	20	19	0	0
56	of which debt securities	347	165	52	0	7	1	9	3	0	1	2	1	0	0
57	of which equity instruments	89	27	11	0	0	0	2	0	0	0	0	0	0	0

		Disclosure reference date 31/12/2025													
		Total gross carrying amount	Circular Economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
				Of which environmentally sustainable (Taxonomy-aligned)		Of which adaptation		Of which environmentally sustainable (Taxonomy-aligned)		Of which adaptation		Of which environmentally sustainable (Taxonomy-aligned)		Of which adaptation	
	Of which specialised lending			Of which specialised lending				Of which specialised lending				Of which specialised lending			
Million EUR															
GAR – Covered assets in both numerator and denominator															
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	92,165	81	5	0	2	49	3	0	3	107	0	0	0	0
2	Financial corporations	15,269	8	0	0	0	3	0	0	0	1	0	0	0	0
3	Credit institutions	13,672	8	0	0	0	2	0	0	0	1	0	0	0	0
4	Loans and advances	11,257	7	0	0	0	2	0	0	0	1	0	0	0	0
5	Debt securities, including UoP	2,392	1	0	0	0	0	0	0	0	0	0	0	0	0
6	Equity instruments	24	0	0	0	0	0	0	0	0	0	0	0	0	0
7	Other financial corporations	1,596	0	0	0	0	0	0	0	0	0	0	0	0	0
8	of which investment firms	1,509	0	0	0	0	0	0	0	0	0	0	0	0	0
9	Loans and advances	1,245	0	0	0	0	0	0	0	0	0	0	0	0	0
10	Debt securities, including UoP	150	0	0	0	0	0	0	0	0	0	0	0	0	0
11	Equity instruments	113	0	0	0	0	0	0	0	0	0	0	0	0	0
12	of which management companies	0	0	0	0	0	0	0	0	0	0	0	0	0	0
13	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	Equity instruments	0	0	0	0	0	0	0	0	0	0	0	0	0	0
16	of which insurance undertakings	87	0	0	0	0	0	0	0	0	0	0	0	0	0
17	Loans and advances	53	0	0	0	0	0	0	0	0	0	0	0	0	0
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	Equity instruments	35	0	0	0	0	0	0	0	0	0	0	0	0	0
20	Non-financial corporations (subject to NFRD disclosure obligations)	24,116	72	5	0	2	46	3	0	3	107	0	0	0	0
21	Loans and advances	23,859	72	5	0	2	46	3	0	3	107	0	0	0	0
22	Debt securities, including UoP	256	0	0	0	0	0	0	0	0	0	0	0	0	0
23	Equity instruments	0	0	0	0	0	0	0	0	0	0	0	0	0	0
24	Households	51,527	0	0	0	0	0	0	0	0	0	0	0	0	0
25	of which loans collateralised by residential immovable property	39,393	0	0	0	0	0	0	0	0	0	0	0	0	0
26	of which building renovation loans	1,318	0	0	0	0	0	0	0	0	0	0	0	0	0
27	of which motor vehicle loans	2,587	0	0	0	0	0	0	0	0	0	0	0	0	0
28	Local government financing	1,254	0	0	0	0	0	0	0	0	0	0	0	0	0
29	Housing financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0
30	Other local government financing	1,254	0	0	0	0	0	0	0	0	0	0	0	0	0
31	Collateral obtained by taking possession: residential and commercial immovable properties	755	0	0	0	0	0	0	0	0	0	0	0	0	0
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	102,638	0	0	0	0	0	0	0	0	0	0	0	0	0

		Disclosure reference date 31/12/2025											
		Circular Economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
33	Financial and non-financial corporations	35,870	0	0	0	0	0	0	0	0	0	0	0
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	27,094	0	0	0	0	0	0	0	0	0	0	0
35	Loans and advances	26,946	0	0	0	0	0	0	0	0	0	0	0
36	of which loans collateralised by commercial immovable property	4,522	0	0	0	0	0	0	0	0	0	0	0
37	of which building renovation loans	0	0	0	0	0	0	0	0	0	0	0	0
38	Debt securities	35	0	0	0	0	0	0	0	0	0	0	0
39	Equity instruments	113	0	0	0	0	0	0	0	0	0	0	0
40	Non-EU country counterparties not subject to NFRD disclosure obligations	8,775	0	0	0	0	0	0	0	0	0	0	0
41	Loans and advances	8,774	0	0	0	0	0	0	0	0	0	0	0
42	Debt securities	0	0	0	0	0	0	0	0	0	0	0	0
43	Equity instruments	1	0	0	0	0	0	0	0	0	0	0	0
44	Derivatives	1,086	0	0	0	0	0	0	0	0	0	0	0
45	On-demand interbank loans	744	0	0	0	0	0	0	0	0	0	0	0
46	Cash and cash-related assets	629	0	0	0	0	0	0	0	0	0	0	0
47	Other assets (goodwill, commodities, etc.)	64,311	0	0	0	0	0	0	0	0	0	0	0
48	Total GAR assets	195,559	81	5	0	2	49	3	0	3	107	0	0
49	Assets not covered for GAR calculation	52,794	0	0	0	0	0	0	0	0	0	0	0
50	Central governments and supranational issuers	38,567	0	0	0	0	0	0	0	0	0	0	0
51	Exposures to central banks	11,032	0	0	0	0	0	0	0	0	0	0	0
52	Trading book	3,194	0	0	0	0	0	0	0	0	0	0	0
53	Total assets	248,353	81	5	0	2	49	3	0	3	107	0	0
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations													
54	Financial guarantees	834	5	0	0	0	2	0	0	0	12	0	0
55	Assets under management	5,887	647	42	0	22	400	8	0	2	2	0	0
56	of which debt securities	347	16	2	0	1	12	1	0	0	0	0	0
57	of which equity instruments	89	18	1	0	1	11	0	0	0	0	0	0

		Disclosure reference date 31/12/2025					
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
		Of which environmentally sustainable (Taxonomy-aligned)					
Million EUR		Total gross carrying amount			Of which specialised lending	Of which transitional	Of which enabling
GAR – Covered assets in both numerator and denominator							
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	92,165	51,029	4,410	2,480	426	649
2	Financial corporations	15,269	2,129	201	0	21	24
3	Credit institutions	13,672	1,826	188	0	18	20
4	Loans and advances	11,257	1,683	177	0	16	19
5	Debt securities, including UoP	2,392	138	10	0	2	2
6	Equity instruments	24	4	0		0	0
7	Other financial corporations	1,596	303	13	0	3	4
8	of which investment firms	1,509	282	12	0	3	4
9	Loans and advances	1,245	267	9	0	3	4
10	Debt securities, including UoP	150	13	2	0	0	0
11	Equity instruments	113	2	0		0	0
12	of which management companies	0	0	0	0	0	0
13	Loans and advances	0	0	0	0	0	0
14	Debt securities, including UoP	0	0	0	0	0	0
15	Equity instruments	0	0	0		0	0
16	of which insurance undertakings	87	21	2	0	0	0
17	Loans and advances	53	21	2	0	0	0
18	Debt securities, including UoP	0	0	0	0	0	0
19	Equity instruments	35	0	0		0	0
20	Non-financial corporations (subject to NFRD disclosure obligations)	24,116	5,582	2,539	809	405	624
21	Loans and advances	23,859	5,399	2,444	809	405	529
22	Debt securities, including UoP	256	183	95	0	0	95
23	Equity instruments	0	0	0	0	0	0
24	Households	51,527	43,298	1,670	1,670	0	0
25	of which loans collateralised by residential immovable property	39,393	39,393	1,670	1,670	0	0
26	of which building renovation loans	1,318	1,318	0	0	0	0
27	of which motor vehicle loans	2,587	2,587	0	0	0	0
28	Local government financing	1,254	20	0	0	0	0
29	Housing financing	0	0	0	0	0	0
30	Other local government financing	1,254	20	0	0	0	0
31	Collateral obtained by taking possession: residential and commercial immovable properties	755	755	0	0	0	0
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	102,638	0	0	0	0	0
33	Financial and non-financial corporations	35,870	0	0	0	0	0
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	27,094	0	0	0	0	0

		Disclosure reference date 31/12/2025				
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
35	Loans and advances	26,946	0	0	0	0
36	of which loans collateralised by commercial immovable property	4,522	0	0	0	0
37	of which building renovation loans	0	0	0	0	0
38	Debt securities	35	0	0	0	0
39	Equity instruments	113	0	0	0	0
40	Non-EU country counterparties not subject to NFRD disclosure obligations	8,775	0	0	0	0
41	Loans and advances	8,774	0	0	0	0
42	Debt securities	0	0	0	0	0
43	Equity instruments	1	0	0	0	0
44	Derivatives	1,086	0	0	0	0
45	On-demand interbank loans	744	0	0	0	0
46	Cash and cash-related assets	629	0	0	0	0
47	Other assets (goodwill, commodities, etc.)	64,311	0	0	0	0
48	Total GAR assets	195,559	51,784	4,410	2,480	426
49	Assets not covered for GAR calculation	52,794	0	0	0	0
50	Central governments and supranational issuers	38,567	0	0	0	0
51	Exposures to central banks	11,032	0	0	0	0
52	Trading book	3,194	0	0	0	0
53	Total assets	248,353	51,784	4,410	2,480	426
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations						
54	Financial guarantees	834	184	9	8	2
55	Assets under management	5,887	3,257	771	0	427
56	of which debt securities	347	204	59	0	3
57	of which equity instruments	89	58	12	0	1

Disclosure reference date 31/12/2024													
Total gross carrying amount	Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)		
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)						Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)		
	Of which environmentally sustainable (Taxonomy-aligned)						Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)		
			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which adaptation			Of which specialised lending	Of which adaptation
Million EUR													
GAR – Covered assets in both numerator and denominator													
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	124,030	87,442	8,286	7,298	337	350	31	6	0	3	1	
2	Financial corporations	14,675	2,443	177	0	21	34	7	1	0	0	0	
3	Credit institutions	13,298	2,235	153	0	21	15	7	1	0	0	0	
4	Loans and advances	11,061	2,086	143	0	19	13	6	1	0	0	0	
5	Debt securities, including UoP	2,225	147	10	0	2	1	0	0	0	0	0	
6	Equity instruments	11	2	0		0	0	0	0		0	0	
7	Other financial corporations	1,378	208	24	0	0	19	0	0	0	0	0	
8	of which investment firms	1,309	192	22	0	0	19	0	0	0	0	0	
9	Loans and advances	1,151	190	22	0	0	19	0	0	0	0	0	
10	Debt securities, including UoP	48	0	0	0	0	0	0	0	0	0	0	
11	Equity instruments	110	2	0		0	0	0	0		0	0	
12	of which management companies	0	0	0	0	0	0	0	0	0	0	0	
13	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	
14	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	
15	Equity instruments	0	0	0		0	0	0	0		0	0	
16	of which insurance undertakings	68	17	1	0	0	0	0	0	0	0	0	
17	Loans and advances	43	17	1	0	0	0	0	0	0	0	0	
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	
19	Equity instruments	25	0	0		0	0	0	0		0	0	
20	Non-financial corporations (subject to NFRD disclosure obligations)	15,256	3,155	1,178	366	275	316	24	5	0	3	1	
21	Loans and advances	14,997	3,001	1,118	366	275	257	24	5	0	3	1	
22	Debt securities, including UoP	259	154	60	0	0	60	0	0	0	0	0	
23	Equity instruments	0	0	0	0	0	0	0	0	0	0	0	
24	Households	92,597	81,843	6,931	6,931	41	0	0	0	0	0	0	
25	of which loans collateralised by residential immovable property	78,458	78,458	6,890	6,890	0	0	0	0	0	0	0	
26	of which building renovation loans	1,212	1,212	0	0	0	0	0	0	0	0	0	
27	of which motor vehicle loans	2,172	2,172	41	41	41	0					0	
28	Local government financing	1,503	1	0	0	0	0	0	0	0	0	0	
29	Housing financing	0	0	0	0	0	0	0	0	0	0	0	
30	Other local government financing	1,503	1	0	0	0	0	0	0	0	0	0	
31	Collateral obtained by taking possession: residential and commercial immovable properties	918	918	0	0	0	0	0	0	0	0	0	
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	62,439											

			Disclosure reference date 31/12/2024										
			Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)	
33	Financial and non-financial corporations	43,543											
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	31,228											
35	Loans and advances	31,072											
36	of which loans collateralised by commercial immovable property	4,688											
37	of which building renovation loans	0											
38	Debt securities	32											
39	Equity instruments	124											
40	Non-EU country counterparties not subject to NFRD disclosure obligations	12,315											
41	Loans and advances	12,314											
42	Debt securities	0											
43	Equity instruments	1											
44	Derivatives	2,395											
45	On-demand interbank loans	566											
46	Cash and cash-related assets	711											
47	Other assets (goodwill, commodities, etc.)	15,224											
48	Total GAR assets	187,387											
49	Assets not covered for GAR calculation	55,383											
50	Central governments and supranational issuers	35,379											
51	Exposures to central banks	17,106											
52	Trading book	2,898											
53	Total assets	242,770											
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations													
54	Financial guarantees	756	132	7	1	0	5	2	0	0	0	1	
55	Assets under management	4,729	1,162	96	0	7	5	19	0	0	0	0	
56	of which debt securities	0	0	0	0	0	0	0	0	0	0	0	
57	of which equity instruments	0	0	0	0	0	0	0	0	0	0	0	

Million EUR		Total gross carrying amount	Disclosure reference date 31/12/2024										
			Circular Economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)		
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)		
				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)	
					Of which specialised lending	Of which adaptation			Of which specialised lending	Of which adaptation			Of which specialised lending
GAR – Covered assets in both numerator and denominator													
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	124,030	12			61				93			
2	Financial corporations	14,675	0			0				0			
3	Credit institutions	13,298	0			0				0			
4	Loans and advances	11,061	0			0				0			
5	Debt securities, including UoP	2,225	0			0				0			
6	Equity instruments	11	0			0				0			
7	Other financial corporations	1,378	0			0				0			
8	of which investment firms	1,309	0			0				0			
9	Loans and advances	1,151	0			0				0			
10	Debt securities, including UoP	48	0			0				0			
11	Equity instruments	110	0			0				0			
12	of which management companies	0	0			0				0			
13	Loans and advances	0	0			0				0			
14	Debt securities, including UoP	0	0			0				0			
15	Equity instruments	0	0			0				0			
16	of which insurance undertakings	68	0			0				0			
17	Loans and advances	43	0			0				0			
18	Debt securities, including UoP	0	0			0				0			
19	Equity instruments	25	0			0				0			
20	Non-financial corporations (subject to NFRD disclosure obligations)	15,256	12			61				93			
21	Loans and advances	14,997	12			29				93			
22	Debt securities, including UoP	259	0			32				0			
23	Equity instruments	0	0			0				0			
24	Households	92,597	0			0				0			
25	of which loans collateralised by residential immovable property	78,458	0			0				0			
26	of which building renovation loans	1,212	0			0				0			
27	of which motor vehicle loans	2,172	0			0				0			
28	Local government financing	1,503	0			0				0			
29	Housing financing	0	0			0				0			
30	Other local government financing	1,503	0			0				0			
31	Collateral obtained by taking possession: residential and commercial immovable properties	918	0			0				0			
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	62,439											

		Disclosure reference date 31/12/2024					
		Circular Economy (CE)		Pollution (PPC)		Biodiversity and Ecosystems (BIO)	
33	Financial and non-financial corporations	43,543					
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	31,228					
35	Loans and advances	31,072					
36	of which loans collateralised by commercial immovable property	4,688					
37	of which building renovation loans	0					
38	Debt securities	32					
39	Equity instruments	124					
40	Non-EU country counterparties not subject to NFRD disclosure obligations	12,315					
41	Loans and advances	12,314					
42	Debt securities	0					
43	Equity instruments	1					
44	Derivatives	2,395					
45	On-demand interbank loans	566					
46	Cash and cash-related assets	711					
47	Other assets (goodwill, commodities, etc.)	15,224					
48	Total GAR assets	187,387					
49	Assets not covered for GAR calculation	55,383					
50	Central governments and supranational issuers	35,379					
51	Exposures to central banks	17,106					
52	Trading book	2,898					
53	Total assets	242,770					
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations							
54	Financial guarantees	756	4	6	10		
55	Assets under management	4,729	2	0	0		
56	of which debt securities	0	0	0	0		
57	of which equity instruments	0	0	0	0		

Million EUR		Total gross carrying amount	Disclosure reference date 31/12/2024				
			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
			Of which environmentally sustainable (Taxonomy-aligned)				
				Of which specialised lending	Of which transitional	Of which enabling	
GAR – Covered assets in both numerator and denominator							
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	124,030	87,641	8,292	7,298	337	353
2	Financial corporations	14,675	2,450	178	0	21	34
3	Credit institutions	13,298	2,241	154	0	21	15
4	Loans and advances	11,061	2,092	144	0	19	13
5	Debt securities, including UoP	2,225	148	10	0	2	2
6	Equity instruments	11	2	0	0	0	0
7	Other financial corporations	1,378	209	24	0	0	19
8	of which investment firms	1,309	192	22	0	0	19
9	Loans and advances	1,151	190	22	0	0	19
10	Debt securities, including UoP	48	0	0	0	0	0
11	Equity instruments	110	2	0	0	0	0
12	of which management companies	0	0	0	0	0	0
13	Loans and advances	0	0	0	0	0	0
14	Debt securities, including UoP	0	0	0	0	0	0
15	Equity instruments	0	0	0	0	0	0
16	of which insurance undertakings	68	17	1	0	0	0
17	Loans and advances	43	17	1	0	0	0
18	Debt securities, including UoP	0	0	0	0	0	0
19	Equity instruments	25	0	0	0	0	0
20	Non-financial corporations (subject to NFRD disclosure obligations)	15,256	3,347	1,183	366	275	319
21	Loans and advances	14,997	3,161	1,123	366	275	260
22	Debt securities, including UoP	259	186	60	0	0	60
23	Equity instruments	0	0	0	0	0	0
24	Households	92,597	81,843	6,931	6,931	41	0
25	of which loans collateralised by residential immovable property	78,458	78,458	6,890	6,890	0	0
26	of which building renovation loans	1,212	1,212	0	0	0	0
27	of which motor vehicle loans	2,172	2,172	41	41	41	0
28	Local government financing	1,503	1	0	0	0	0
29	Housing financing	0	0	0	0	0	0
30	Other local government financing	1,503	1	0	0	0	0
31	Collateral obtained by taking possession: residential and commercial immovable properties	918	918	0	0	0	0
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	62,439					
33	Financial and non-financial corporations	43,543					
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	31,228					

			Disclosure reference date 31/12/2024				
			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
35	Loans and advances	31,072					
36	of which loans collateralised by commercial immovable property	4,688					
37	of which building renovation loans	0					
38	Debt securities	32					
39	Equity instruments	124					
40	Non-EU country counterparties not subject to NFRD disclosure obligations	12,315					
41	Loans and advances	12,314					
42	Debt securities	0					
43	Equity instruments	1					
44	Derivatives	2,395					
45	On-demand interbank loans	566					
46	Cash and cash-related assets	711					
47	Other assets (goodwill, commodities, etc.)	15,224					
48	Total GAR assets	187,387					
49	Assets not covered for GAR calculation	55,383					
50	Central governments and supranational issuers	35,379					
51	Exposures to central banks	17,106					
52	Trading book	2,898					
53	Total assets	242,770					
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations							
54	Financial guarantees	756	155	8	1	0	5
55	Assets under management	4,729	1,183	96	0	7	6
56	of which debt securities	0	0	0	0	0	0
57	of which equity instruments	0	0	0	0	0	0

Assets used to calculate the GAR in relation to CapEx KPIs

Million EUR		Total gross carrying amount	Disclosure reference date 31/12/2025												
			Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)			
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
			Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
				Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which adaptation			Of which specialised lending	Of which adaptation	
GAR – Covered assets in both numerator and denominator															
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	92,165	51,814	5,524	2,480	457	835	128	6	0	3	5	2	0	0
2	Financial corporations	15,269	2,284	268	0	26	34	10	1	0	0	1	0	0	0
3	Credit institutions	13,672	2,013	257	0	22	33	9	1	0	0	1	0	0	0
4	Loans and advances	11,257	1,870	244	0	20	30	9	1	0	0	0	0	0	0
5	Debt securities, including UoP	2,392	139	12	0	2	2	1	0	0	0	0	0	0	0
6	Equity instruments	24	4	0	0	0	0	0	0	0	0	0	0	0	0
7	Other financial corporations	1,596	272	12	0	5	2	0	0	0	0	0	0	0	0
8	of which investment firms	1,509	250	10	0	5	2	0	0	0	0	0	0	0	0
9	Loans and advances	1,245	235	7	0	5	1	0	0	0	0	0	0	0	0
10	Debt securities, including UoP	150	13	2	0	0	0	0	0	0	0	0	0	0	0
11	Equity instruments	113	3	0	0	0	0	0	0	0	0	0	0	0	0
12	of which management companies	0	0	0	0	0	0	0	0	0	0	0	0	0	0
13	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	Equity instruments	0	0	0	0	0	0	0	0	0	0	0	0	0	0
16	of which insurance undertakings	87	22	2	0	0	0	0	0	0	0	0	0	0	0
17	Loans and advances	53	22	2	0	0	0	0	0	0	0	0	0	0	0
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	Equity instruments	35	0	0	0	0	0	0	0	0	0	0	0	0	0
20	Non-financial corporations (subject to NFRD disclosure obligations)	24,116	6,212	3,585	809	430	801	118	5	0	3	5	2	0	0
21	Loans and advances	23,859	6,025	3,486	809	430	702	118	5	0	3	5	2	0	0
22	Debt securities, including UoP	256	187	99	0	0	99	0	0	0	0	0	0	0	0
23	Equity instruments	0	0	0	0	0	0	0	0	0	0	0	0	0	0
24	Households	51,527	43,298	1,670	1,670	0	0	0	0	0	0	0	0	0	0
25	of which loans collateralised by residential immovable property	39,393	39,393	1,670	1,670	0	0	0	0	0	0	0	0	0	0
26	of which building renovation loans	1,318	1,318	0	0	0	0	0	0	0	0	0	0	0	0
27	of which motor vehicle loans	2,587	2,587	0	0	0	0	0	0	0	0	0	0	0	0
28	Local government financing	1,254	20	0	0	0	0	0	0	0	0	0	0	0	0
29	Housing financing	0	0	0	0	0	0	0	0	0	0	0	0	0	0
30	Other local government financing	1,254	20	0	0	0	0	0	0	0	0	0	0	0	0

		Disclosure reference date 31/12/2025													
		Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)			
31	Collateral obtained by taking possession: residential and commercial immovable properties	755	755	0	0	0	0	0	0	0	0	0	0	0	0
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	102,638	0	0	0	0	0	0	0	0	0	0	0	0	0
33	Financial and non-financial corporations	35,870	0	0	0	0	0	0	0	0	0	0	0	0	0
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	27,094	0	0	0	0	0	0	0	0	0	0	0	0	0
35	Loans and advances	26,946	0	0	0	0	0	0	0	0	0	0	0	0	0
36	of which loans collateralised by commercial immovable property	4,522	0	0	0	0	0	0	0	0	0	0	0	0	0
37	of which building renovation loans	0	0	0	0	0	0	0	0	0	0	0	0	0	0
38	Debt securities	35	0	0	0	0	0	0	0	0	0	0	0	0	0
39	Equity instruments	113	0	0	0	0	0	0	0	0	0	0	0	0	0
40	Non-EU country counterparties not subject to NFRD disclosure obligations	8,775	0	0	0	0	0	0	0	0	0	0	0	0	0
41	Loans and advances	8,774	0	0	0	0	0	0	0	0	0	0	0	0	0
42	Debt securities	0	0	0	0	0	0	0	0	0	0	0	0	0	0
43	Equity instruments	1	0	0	0	0	0	0	0	0	0	0	0	0	0
44	Derivatives	1,086	0	0	0	0	0	0	0	0	0	0	0	0	0
45	On-demand interbank loans	744	0	0	0	0	0	0	0	0	0	0	0	0	0
46	Cash and cash-related assets	629	0	0	0	0	0	0	0	0	0	0	0	0	0
47	Other assets (goodwill, commodities, etc.)	64,311	0	0	0	0	0	0	0	0	0	0	0	0	0
48	Total GAR assets	195,559	52,570	5,524	2,480	457	835	128	6	0	3	5	2	0	0
49	Assets not covered for GAR calculation	52,794	0	0	0	0	0	0	0	0	0	0	0	0	0
50	Central governments and supranational issuers	38,567	0	0	0	0	0	0	0	0	0	0	0	0	0
51	Exposures to central banks	11,032	0	0	0	0	0	0	0	0	0	0	0	0	0
52	Trading book	3,194	0	0	0	0	0	0	0	0	0	0	0	0	0
53	Total assets	248,353	52,570	5,524	2,480	457	835	128	6	0	3	5	2	0	0
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations															
54	Financial guarantees	834	228	9	8	0	1	6	0	0	0	1	0	0	0
55	Assets under management	5,887	2,736	1,077	0	107	605	301	54	0	32	27	21	0	0
56	of which debt securities	347	215	86	0	8	1	19	5	0	3	2	1	0	0
57	of which equity instruments	89	36	16	0	1	0	5	0	0	0	0	0	0	0

		Total gross carrying amount	Disclosure reference date 31/12/2025											
			Circular Economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
				Of which environmentally sustainable (Taxonomy-aligned)		Of which adaptation		Of which environmentally sustainable (Taxonomy-aligned)		Of which adaptation		Of which environmentally sustainable (Taxonomy-aligned)		Of which adaptation
	Of which specialised lending			Of which specialised lending				Of which specialised lending						
Million EUR														
GAR – Covered assets in both numerator and denominator														
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	92,165	136	14	0	0	31	4	0	3	124	0	0	0
2	Financial corporations	15,269	8	0	0	0	1	0	0	0	1	0	0	0
3	Credit institutions	13,672	8	0	0	0	1	0	0	0	1	0	0	0
4	Loans and advances	11,257	8	0	0	0	1	0	0	0	1	0	0	0
5	Debt securities, including UoP	2,392	1	0	0	0	0	0	0	0	0	0	0	0
6	Equity instruments	24	0	0	0	0	0	0	0	0	0	0	0	0
7	Other financial corporations	1,596	0	0	0	0	0	0	0	0	0	0	0	0
8	of which investment firms	1,509	0	0	0	0	0	0	0	0	0	0	0	0
9	Loans and advances	1,245	0	0	0	0	0	0	0	0	0	0	0	0
10	Debt securities, including UoP	150	0	0	0	0	0	0	0	0	0	0	0	0
11	Equity instruments	113	0	0	0	0	0	0	0	0	0	0	0	0
12	of which management companies	0	0	0	0	0	0	0	0	0	0	0	0	0
13	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	0	0
14	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0
15	Equity instruments	0	0	0	0	0	0	0	0	0	0	0	0	0
16	of which insurance undertakings	87	0	0	0	0	0	0	0	0	0	0	0	0
17	Loans and advances	53	0	0	0	0	0	0	0	0	0	0	0	0
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	0	0
19	Equity instruments	35	0	0	0	0	0	0	0	0	0	0	0	0
20	Non-financial corporations (subject to NFRD disclosure obligations)	24,116	127	14	0	0	29	4	0	3	123	0	0	0
21	Loans and advances	23,859	127	14	0	0	29	4	0	3	123	0	0	0
22	Debt securities, including UoP	256	0	0	0	0	0	0	0	0	0	0	0	0
23	Equity instruments	0	0	0	0	0	0	0	0	0	0	0	0	0
24	Households	51,527	0	0	0	0	0	0	0	0	0	0	0	0
25	of which loans collateralised by residential immovable property	39,393	0	0	0	0	0	0	0	0	0	0	0	0
26	of which building renovation loans	1,318	0	0	0	0	0	0	0	0	0	0	0	0
27	of which motor vehicle loans	2,587	0	0	0	0	0	0	0	0	0	0	0	0
28	Local government financing	1,254	0	0	0	0	0	0	0	0	0	0	0	0
29	Housing financing	0	0	0	0	0	0	0	0	0	0	0	0	0
30	Other local government financing	1,254	0	0	0	0	0	0	0	0	0	0	0	0
31	Collateral obtained by taking possession: residential and commercial immovable properties	755	0	0	0	0	0	0	0	0	0	0	0	0
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	102,638	0	0	0	0	0	0	0	0	0	0	0	0

		Disclosure reference date 31/12/2025											
		Circular Economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
33	Financial and non-financial corporations	35,870	0	0	0	0	0	0	0	0	0	0	0
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	27,094	0	0	0	0	0	0	0	0	0	0	0
35	Loans and advances	26,946	0	0	0	0	0	0	0	0	0	0	0
36	of which loans collateralised by commercial immovable property	4,522	0	0	0	0	0	0	0	0	0	0	0
37	of which building renovation loans	0	0	0	0	0	0	0	0	0	0	0	0
38	Debt securities	35	0	0	0	0	0	0	0	0	0	0	0
39	Equity instruments	113	0	0	0	0	0	0	0	0	0	0	0
40	Non-EU country counterparties not subject to NFRD disclosure obligations	8,775	0	0	0	0	0	0	0	0	0	0	0
41	Loans and advances	8,774	0	0	0	0	0	0	0	0	0	0	0
42	Debt securities	0	0	0	0	0	0	0	0	0	0	0	0
43	Equity instruments	1	0	0	0	0	0	0	0	0	0	0	0
44	Derivatives	1,086	0	0	0	0	0	0	0	0	0	0	0
45	On-demand interbank loans	744	0	0	0	0	0	0	0	0	0	0	0
46	Cash and cash-related assets	629	0	0	0	0	0	0	0	0	0	0	0
47	Other assets (goodwill, commodities, etc.)	64,311	0	0	0	0	0	0	0	0	0	0	0
48	Total GAR assets	195,559	136	14	0	0	31	4	0	3	124	0	0
49	Assets not covered for GAR calculation	52,794	0	0	0	0	0	0	0	0	0	0	0
50	Central governments and supranational issuers	38,567	0	0	0	0	0	0	0	0	0	0	0
51	Exposures to central banks	11,032	0	0	0	0	0	0	0	0	0	0	0
52	Trading book	3,194	0	0	0	0	0	0	0	0	0	0	0
53	Total assets	248,353	136	14	0	0	31	4	0	3	124	0	0
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations													
54	Financial guarantees	834	7	0	0	0	2	0	0	0	14	0	0
55	Assets under management	5,887	435	61	0	46	265	9	0	2	2	0	0
56	of which debt securities	347	9	2	0	0	7	1	0	0	0	0	0
57	of which equity instruments	89	13	2	0	2	7	0	0	0	0	0	0

		Disclosure reference date 31/12/2025					
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
		Of which environmentally sustainable (Taxonomy-aligned)					
Million EUR		Total gross carrying amount			Of which specialised lending	Of which transitional	Of which enabling
GAR – Covered assets in both numerator and denominator							
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	92,165	52,237	5,549	2,480	457	841
2	Financial corporations	15,269	2,305	270	0	26	35
3	Credit institutions	13,672	2,032	258	0	22	33
4	Loans and advances	11,257	1,888	246	0	20	30
5	Debt securities, including UoP	2,392	140	12	0	2	2
6	Equity instruments	24	4	0	0	0	0
7	Other financial corporations	1,596	272	12	0	5	2
8	of which investment firms	1,509	250	10	0	5	2
9	Loans and advances	1,245	235	7	0	5	1
10	Debt securities, including UoP	150	13	2	0	0	0
11	Equity instruments	113	3	0	0	0	0
12	of which management companies	0	0	0	0	0	0
13	Loans and advances	0	0	0	0	0	0
14	Debt securities, including UoP	0	0	0	0	0	0
15	Equity instruments	0	0	0	0	0	0
16	of which insurance undertakings	87	22	2	0	0	0
17	Loans and advances	53	22	2	0	0	0
18	Debt securities, including UoP	0	0	0	0	0	0
19	Equity instruments	35	0	0	0	0	0
20	Non-financial corporations (subject to NFRD disclosure obligations)	24,116	6,615	3,609	809	430	806
21	Loans and advances	23,859	6,428	3,510	809	430	707
22	Debt securities, including UoP	256	187	99	0	0	99
23	Equity instruments	0	0	0	0	0	0
24	Households	51,527	43,298	1,670	1,670	0	0
25	of which loans collateralised by residential immovable property	39,393	39,393	1,670	1,670	0	0
26	of which building renovation loans	1,318	1,318	0	0	0	0
27	of which motor vehicle loans	2,587	2,587	0	0	0	0
28	Local government financing	1,254	20	0	0	0	0
29	Housing financing	0	0	0	0	0	0
30	Other local government financing	1,254	20	0	0	0	0
31	Collateral obtained by taking possession: residential and commercial immovable properties	755	755	0	0	0	0
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	102,638	0	0	0	0	0
33	Financial and non-financial corporations	35,870	0	0	0	0	0
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	27,094	0	0	0	0	0

		Disclosure reference date 31/12/2025				
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
35	Loans and advances	26,946	0	0	0	0
36	of which loans collateralised by commercial immovable property	4,522	0	0	0	0
37	of which building renovation loans	0	0	0	0	0
38	Debt securities	35	0	0	0	0
39	Equity instruments	113	0	0	0	0
40	Non-EU country counterparties not subject to NFRD disclosure obligations	8,775	0	0	0	0
41	Loans and advances	8,774	0	0	0	0
42	Debt securities	0	0	0	0	0
43	Equity instruments	1	0	0	0	0
44	Derivatives	1,086	0	0	0	0
45	On-demand interbank loans	744	0	0	0	0
46	Cash and cash-related assets	629	0	0	0	0
47	Other assets (goodwill, commodities, etc.)	64,311	0	0	0	0
48	Total GAR assets	195,559	52,993	5,549	2,480	457
49	Assets not covered for GAR calculation	52,794	0	0	0	0
50	Central governments and supranational issuers	38,567	0	0	0	0
51	Exposures to central banks	11,032	0	0	0	0
52	Trading book	3,194	0	0	0	0
53	Total assets	248,353	52,993	5,549	2,480	457
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations						
54	Financial guarantees	834	257	9	8	1
55	Assets under management	5,887	3,765	1,222	0	685
56	of which debt securities	347	253	95	0	4
57	of which equity instruments	89	62	19	0	2

Disclosure reference date 31/12/2024													
Total gross carrying amount	Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)		
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)						Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)		
	Of which environmentally sustainable (Taxonomy-aligned)						Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)		
		Of which specialised lending	Of which transitional	Of which enabling				Of which specialised lending	Of which adaptation			Of which specialised lending	Of which adaptation
Million EUR													
GAR – Covered assets in both numerator and denominator													
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	124,030	88,324	8,754	7,298	367	506	63	8	0	1	3	
2	Financial corporations	14,675	2,445	205	0	28	43	6	2	0	0	0	
3	Credit institutions	13,298	2,246	184	0	28	25	6	1	0	0	0	
4	Loans and advances	11,061	2,093	171	0	25	22	5	1	0	0	0	
5	Debt securities, including UoP	2,225	151	13	0	3	2	1	0	0	0	0	
6	Equity instruments	11	2	0		0	0	0	0		0	0	
7	Other financial corporations	1,378	199	21	0	0	18	0	0	0	0	0	
8	of which investment firms	1,309	182	19	0	0	18	0	0	0	0	0	
9	Loans and advances	1,151	175	19	0	0	18	0	0	0	0	0	
10	Debt securities, including UoP	48	0	0	0	0	0	0	0	0	0	0	
11	Equity instruments	110	7	0		0	0	0	0		0	0	
12	of which management companies	0	0	0	0	0	0	0	0	0	0	0	
13	Loans and advances	0	0	0	0	0	0	0	0	0	0	0	
14	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	
15	Equity instruments	0	0	0		0	0	0	0		0	0	
16	of which insurance undertakings	68	18	1	0	0	0	0	0	0	0	0	
17	Loans and advances	43	18	1	0	0	0	0	0	0	0	0	
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0	
19	Equity instruments	25	0	0		0	0	0	0		0	0	
20	Non-financial corporations (subject to NFRD disclosure obligations)	15,256	4,035	1,617	366	298	463	57	7	0	1	3	
21	Loans and advances	14,997	3,880	1,547	366	298	394	57	7	0	1	3	
22	Debt securities, including UoP	259	155	70	0	0	70	0	0	0	0	0	
23	Equity instruments	0	0	0	0	0	0	0	0	0	0	0	
24	Households	92,597	81,843	6,931	6,931	41	0	0	0	0	0	0	
25	of which loans collateralised by residential immovable property	78,458	78,458	6,890	6,890	0	0	0	0	0	0	0	
26	of which building renovation loans	1,212	1,212	0	0	0	0	0	0	0	0	0	
27	of which motor vehicle loans	2,172	2,172	41	41	41	0					0	
28	Local government financing	1,503	1	0	0	0	0	0	0	0	0	0	
29	Housing financing	0	0	0	0	0	0	0	0	0	0	0	
30	Other local government financing	1,503	1	0	0	0	0	0	0	0	0	0	
31	Collateral obtained by taking possession: residential and commercial immovable properties	918	918	0	0	0	0	0	0	0	0	0	
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	62,439	0	0	0	0	0	0	0	0	0	0	

			Disclosure reference date 31/12/2024											
			Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)	
33	Financial and non-financial corporations	43,543												
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	31,228												
35	Loans and advances	31,072												
36	of which loans collateralised by commercial immovable property	4,688												
37	of which building renovation loans	0												
38	Debt securities	32												
39	Equity instruments	124												
40	Non-EU country counterparties not subject to NFRD disclosure obligations	12,315												
41	Loans and advances	12,314												
42	Debt securities	0												
43	Equity instruments	1												
44	Derivatives	2,395												
45	On-demand interbank loans	566												
46	Cash and cash-related assets	711												
47	Other assets (goodwill, commodities, etc.)	15,224												
48	Total GAR assets	187,387												
49	Assets not covered for GAR calculation	55,383												
50	Central governments and supranational issuers	35,379												
51	Exposures to central banks	17,106												
52	Trading book	2,898												
53	Total assets	242,770												
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations														
54	Financial guarantees	756	218	4	1	0	1	1	0	0	0	0		
55	Assets under management	4,729	988	66	0	17	13	3	1	0	0	0		
56	of which debt securities	0	0	0	0	0	0	0	0	0	0	0		
57	of which equity instruments	0	0	0	0	0	0	0	0	0	0	0		

Million EUR		Total gross carrying amount	Disclosure reference date 31/12/2024											
			Circular Economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)					
			Of which specialised lending	Of which adaptation		Of which specialised lending	Of which adaptation		Of which specialised lending	Of which adaptation				
GAR – Covered assets in both numerator and denominator														
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	124,030	43			29				100				
2	Financial corporations	14,675	0			0				0				
3	Credit institutions	13,298	0			0				0				
4	Loans and advances	11,061	0			0				0				
5	Debt securities, including UoP	2,225	0			0				0				
6	Equity instruments	11	0			0				0				
7	Other financial corporations	1,378	0			0				0				
8	of which investment firms	1,309	0			0				0				
9	Loans and advances	1,151	0			0				0				
10	Debt securities, including UoP	48	0			0				0				
11	Equity instruments	110	0			0				0				
12	of which management companies	0	0			0				0				
13	Loans and advances	0	0			0				0				
14	Debt securities, including UoP	0	0			0				0				
15	Equity instruments	0	0			0				0				
16	of which insurance undertakings	68	0			0				0				
17	Loans and advances	43	0			0				0				
18	Debt securities, including UoP	0	0			0				0				
19	Equity instruments	25	0			0				0				
20	Non-financial corporations (subject to NFRD disclosure obligations)	15,256	43			29				100				
21	Loans and advances	14,997	43			25				100				
22	Debt securities, including UoP	259	0			4				0				
23	Equity instruments	0	0			0				0				
24	Households	92,597	0			0				0				
25	of which loans collateralised by residential immovable property	78,458	0			0				0				
26	of which building renovation loans	1,212	0			0				0				
27	of which motor vehicle loans	2,172				0				0				
28	Local government financing	1,503	0			0				0				
29	Housing financing	0	0			0				0				
30	Other local government financing	1,503	0			0				0				
31	Collateral obtained by taking possession: residential and commercial immovable properties	918	0			0				0				
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	62,439	0			0				0				

		Disclosure reference date 31/12/2024					
		Circular Economy (CE)		Pollution (PPC)		Biodiversity and Ecosystems (BIO)	
33	Financial and non-financial corporations	43,543					
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	31,228					
35	Loans and advances	31,072					
36	of which loans collateralised by commercial immovable property	4,688					
37	of which building renovation loans	0					
38	Debt securities	32					
39	Equity instruments	124					
40	Non-EU country counterparties not subject to NFRD disclosure obligations	12,315					
41	Loans and advances	12,314					
42	Debt securities	0					
43	Equity instruments	1					
44	Derivatives	2,395					
45	On-demand interbank loans	566					
46	Cash and cash-related assets	711					
47	Other assets (goodwill, commodities, etc.)	15,224					
48	Total GAR assets	187,387					
49	Assets not covered for GAR calculation	55,383					
50	Central governments and supranational issuers	35,379					
51	Exposures to central banks	17,106					
52	Trading book	2,898					
53	Total assets	242,770					
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations							
54	Financial guarantees	756	4	5		11	
55	Assets under management	4,729	2	0		0	
56	of which debt securities	0	0	0		0	
57	of which equity instruments	0	0	0		0	

		Disclosure reference date 31/12/2024					
		Total gross carrying amount	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
			Of which environmentally sustainable (Taxonomy-aligned)				
Million EUR				Of which specialised lending	Of which transitional	Of which enabling	
GAR – Covered assets in both numerator and denominator							
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	124,030	88,562	8,762	7,298	367	507
2	Financial corporations	14,675	2,451	207	0	28	43
3	Credit institutions	13,298	2,252	186	0	28	25
4	Loans and advances	11,061	2,098	172	0	25	22
5	Debt securities, including UoP	2,225	152	13	0	3	2
6	Equity instruments	11	2	0		0	0
7	Other financial corporations	1,378	200	21	0	0	18
8	of which investment firms	1,309	182	19	0	0	18
9	Loans and advances	1,151	175	19	0	0	18
10	Debt securities, including UoP	48	0	0	0	0	0
11	Equity instruments	110	7	0		0	0
12	of which management companies	0	0	0	0	0	0
13	Loans and advances	0	0	0	0	0	0
14	Debt securities, including UoP	0	0	0	0	0	0
15	Equity instruments	0	0	0		0	0
16	of which insurance undertakings	68	18	1	0	0	0
17	Loans and advances	43	18	1	0	0	0
18	Debt securities, including UoP	0	0	0	0	0	0
19	Equity instruments	25	0	0		0	0
20	Non-financial corporations (subject to NFRD disclosure obligations)	15,256	4,267	1,624	366	298	464
21	Loans and advances	14,997	4,107	1,554	366	298	394
22	Debt securities, including UoP	259	159	70	0	0	70
23	Equity instruments	0	0	0	0	0	0
24	Households	92,597	81,843	6,931	6,931	41	0
25	of which loans collateralised by residential immovable property	78,458	78,458	6,890	6,890	0	0
26	of which building renovation loans	1,212	1,212	0	0	0	0
27	of which motor vehicle loans	2,172	2,172	41	41	41	0
28	Local government financing	1,503	1	0	0	0	0
29	Housing financing	0	0	0	0	0	0
30	Other local government financing	1,503	1	0	0	0	0
31	Collateral obtained by taking possession: residential and commercial immovable properties	918	918	0	0	0	0
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	62,439	0	0	0	0	0
33	Financial and non-financial corporations	43,543					
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	31,228					

		Disclosure reference date 31/12/2024			
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
35	Loans and advances	31,072			
36	of which loans collateralised by commercial immovable property	4,688			
37	of which building renovation loans	0			
38	Debt securities	32			
39	Equity instruments	124			
40	Non-EU country counterparties not subject to NFRD disclosure obligations	12,315			
41	Loans and advances	12,314			
42	Debt securities	0			
43	Equity instruments	1			
44	Derivatives	2,395			
45	On-demand interbank loans	566			
46	Cash and cash-related assets	711			
47	Other assets (goodwill, commodities, etc.)	15,224			
48	Total GAR assets	187,387			
49	Assets not covered for GAR calculation	55,383			
50	Central governments and supranational issuers	35,379			
51	Exposures to central banks	17,106			
52	Trading book	2,898			
53	Total assets	242,770			
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations					
54	Financial guarantees	756	239	4	1 0 2
55	Assets under management	4,729	993	66	0 17 13
56	of which debt securities	0	0	0	0 0 0
57	of which equity instruments	0	0	0	0 0 0



2. Assets of non-financial corporations used to calculate the GAR in relation to turnover and CapEx KPIs, broken down by activity sector

Assets of non-financial corporations used to calculate the GAR in relation to **turnover** KPIs, broken down by activity sector

			Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)				Circular Economy (CE)			
			Non-financial corporations (subject to NFRD disclosure obligations)		SMEs and other NFCs not subject to NFRD		Non-financial corporations (subject to NFRD disclosure obligations)		SMEs and other NFCs not subject to NFRD		Non-financial corporations (subject to NFRD disclosure obligations)		SMEs and other NFCs not subject to NFRD		Non-financial corporations (subject to NFRD disclosure obligations)		SMEs and other NFCs not subject to NFRD	
			Carrying amount [gross]		Carrying amount [gross]		Carrying amount [gross]		Carrying amount [gross]		Carrying amount [gross]		Carrying amount [gross]		Carrying amount [gross]		Carrying amount [gross]	
			Million EUR	Of which environmentally sustainable (CCM)	Million EUR	Of which environmentally sustainable (CCM)	Million EUR	Of which environmentally sustainable (CCA)	Million EUR	Of which environmentally sustainable (CCA)	Million EUR	Of which environmentally sustainable (WTR)	Million EUR	Of which environmentally sustainable (WTR)	Million EUR	Of which environmentally sustainable (CE)	Million EUR	Of which environmentally sustainable (CE)
Breakdown by sector - NACE 4 digits level (code and label)																		
1	111	Growing of cereals (except rice), leguminous crops and oil seeds	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2	113	Growing of vegetables and melons, roots and tubers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3	119	Growing of other nonperennial crops	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4	121	Growing of grapes	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5	122	Growing of tropical and subtropical fruits	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6	123	Growing of citrus fruits	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7	124	Growing of pome fruits and stone fruits	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8	125	Growing of other tree and bush fruits and nuts	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9	126	Growing of oleaginous fruits	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10	142	Raising of other cattle and buffaloes	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11	143	Raising of horses and other equines	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12	145	Raising of sheep and goats	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
13	146	Raising of swine/pigs	1.56	1.11	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	147	Raising of poultry	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	149	Raising of other animals	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
16	150	Mixed farming	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17	161	Support activities for crop production	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
18	162	Support activities for animal production	0.21	0.19	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	210	Silviculture and other forestry activities	0.62	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
20	220	Logging	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
21	311	Marine fishing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
22	321	Marine aquaculture	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
23	322	Freshwater aquaculture	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
24	510	Mining of hard coal	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
25	610	Extraction of crude petroleum	2.15	0.25	0	0	0	0	0	0	0	0	0	0	0	0	0	0
26	729	Mining of other nonferrous metal ores	0.54	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
27	891	Mining of chemical and fertiliser minerals	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
28	893	Extraction of salt	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
29	899	Other mining and quarrying n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

			Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)				Circular Economy (CE)			
30	1011	Processing and preserving of meat	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
31	1012	Processing and preserving of poultry meat	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
32	1013	Production of meat and poultry meat products	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
33	1020	Processing and preserving of fish, crustaceans and molluscs	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
34	1032	Manufacture of fruit and vegetable juice	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
35	1039	Other processing and preserving of fruit and vegetables	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
36	1041	Manufacture of oils and fats	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
37	1042	Manufacture of margarine and similar edible fats	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
38	1051	Operation of dairies and cheese making	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
39	1052	Manufacture of ice cream	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
40	1061	Manufacture of grain mill products	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
41	1071	Manufacture of bread; manufacture of fresh pastry goods and cakes	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
42	1072	Manufacture of rusks and biscuits; manufacture of preserved pastry goods and cakes	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
43	1073	Manufacture of macaroni, noodles, couscous and similar farinaceous products	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
44	1081	Manufacture of sugar	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
45	1082	Manufacture of cocoa, chocolate and sugar confectionery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
46	1084	Manufacture of condiments and seasonings	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
47	1085	Manufacture of prepared meals and dishes	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
48	1086	Manufacture of homogenised food preparations and dietetic food	0.26	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
49	1089	Manufacture of other food products n.e.c.	0.85	0.05	0	0	0	0	0	0	0	0	0	0	0.79	0	0	0
50	1091	Manufacture of prepared feeds for farm animals	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
51	1092	Manufacture of prepared pet foods	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
52	1101	Distilling, rectifying and blending of spirits	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
53	1102	Manufacture of wine from grape	0.32	0.04	0	0	0	0	0	0	0	0	0	0	0	0	0	0
54	1105	Manufacture of beer	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
55	1106	Manufacture of malt	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
56	1107	Manufacture of soft drinks; production of mineral waters and other bottled waters	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
57	1200	Manufacture of tobacco products	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
58	1310	Preparation and spinning of textile fibres	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
59	1320	Weaving of textiles	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
60	1330	Finishing of textiles	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
61	1391	Manufacture of knitted and crocheted fabrics	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
62	1392	Manufacture of madeup textile articles, except apparel	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
63	1395	Manufacture of non-wovens and articles made from non-wovens, except apparel	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
64	1396	Manufacture of other technical and industrial textiles	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
65	1399	Manufacture of other textiles n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
66	1412	Manufacture of workwear	0.01	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
67	1413	Manufacture of other outerwear	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
68	1419	Manufacture of other wearing apparel and accessories	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
69	1431	Manufacture of knitted and crocheted hosiery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

			Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)				Circular Economy (CE)			
70	1439	Manufacture of other knitted and crocheted apparel	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
71	1511	Tanning and dressing of leather; dressing and dyeing of fur	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
72	1520	Manufacture of footwear	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
73	1610	Sawmilling and planing of wood	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
74	1621	Manufacture of veneer sheets and woodbased panels	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
75	1623	Manufacture of other builders' carpentry and joinery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
76	1624	Manufacture of wooden containers	0.46	0.05	0	0	0	0	0	0	0	0	0	0	0	0	0	0
77	1629	Manufacture of other products of wood; manufacture of articles of cork, straw and plaiting materials	0.03	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
78	1711	Manufacture of pulp	10.57	10.37	0	0	0	0	0	0	0	0	0	0	0	0	0	0
79	1712	Manufacture of paper and paperboard	0.01	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
80	1721	Manufacture of corrugated paper and paperboard and of containers of paper and paperboard	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
81	1722	Manufacture of household and sanitary goods and of toilet requisites	0.01	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
82	1723	Manufacture of paper stationery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
83	1729	Manufacture of other articles of paper and paperboard	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
84	1811	Printing of newspapers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
85	1812	Other printing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
86	1920	Manufacture of refined petroleum products	2.59	0.11	0	0	0	0	0	0	0	0	0	0	0	0	0	0
87	2011	Manufacture of industrial gases	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
88	2012	Manufacture of dyes and pigments	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
89	2013	Manufacture of other inorganic basic chemicals	5.21	1.17	0	0	0	0	0	0	0	0	0	0	0.1	0	0	0
90	2014	Manufacture of other organic basic chemicals	0.84	0.01	0	0	0	0	0	0	0	0	0	0	0	0	0	0
91	2015	Manufacture of fertilisers and nitrogen compounds	0.71	0.05	0	0	0.01	0	0	0	0	0	0	0	0	0	0	0
92	2016	Manufacture of plastics in primary forms	0.01	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
93	2017	Manufacture of synthetic rubber in primary forms	0.69	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
94	2020	Manufacture of pesticides and other agrochemical products	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
95	2030	Manufacture of paints, varnishes and similar coatings, printing ink and mastics	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
96	2041	Manufacture of soap and detergents, cleaning and polishing preparations	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
97	2042	Manufacture of perfumes and toilet preparations	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
98	2051	Manufacture of explosives	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
99	2052	Manufacture of glues	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
100	2059	Manufacture of other chemical products n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
101	2060	Manufacture of manmade fibres	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
102	2110	Manufacture of basic pharmaceutical products	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
103	2120	Manufacture of pharmaceutical preparations	0.08	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
104	2211	Manufacture of rubber tyres and tubes; retreading and rebuilding of rubber tyres	0.84	0	0	0	0	0	0	0	0	0	0	0	0.01	0	0	0
105	2219	Manufacture of other rubber products	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
106	2221	Manufacture of plastic plates, sheets, tubes and profiles	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
107	2222	Manufacture of plastic packing goods	0.01	0	0	0	0	0	0	0	0	0	0	0	4.32	0	0	0
108	2223	Manufacture of builders' ware of plastic	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
109	2229	Manufacture of other plastic products	1.59	1.42	0	0	0	0	0	0	0	0	0	0	0.11	0	0	0

			Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)				Circular Economy (CE)			
110	2311	Manufacture of flat glass	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
111	2313	Manufacture of hollow glass	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
112	2314	Manufacture of glass fibres	0.01	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
113	2320	Manufacture of refractory products	0.03	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
114	2331	Manufacture of ceramic tiles and flags	0.01	0	0	0	0	0	0	0	0	0	0	0	0.02	0	0	0
115	2332	Manufacture of bricks, tiles and construction products, in baked clay	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
116	2342	Manufacture of ceramic sanitary fixtures	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
117	2344	Manufacture of other technical ceramic products	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
118	2349	Manufacture of other ceramic products	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
119	2351	Manufacture of cement	11.3	0.79	0	0	0.06	0	0	0	0.01	0	0	0	0.4	0	0	0
120	2352	Manufacture of lime and plaster	2.51	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
121	2361	Manufacture of concrete products for construction purposes	0.06	0	0	0	0	0	0	0	0	0	0	0	0.01	0	0	0
122	2364	Manufacture of mortars	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
123	2370	Cutting, shaping and finishing of stone	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
124	2399	Manufacture of other non-metallic mineral products n.e.c.	1.99	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
125	2410	Manufacture of basic iron and steel and of ferroalloys	40.44	7.18	0	0	0	0	0	0	0	0	0	0	0	0	0	0
126	2431	Cold drawing of bars	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
127	2432	Cold rolling of narrow strip	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
128	2433	Cold forming or folding	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
129	2434	Cold drawing of wire	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
130	2442	Aluminium production	13.37	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
131	2443	Lead, zinc and tin production	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
132	2444	Copper production	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
133	2445	Other nonferrous metal production	251	234.51	0	0	0	0	0	0	0	0	0	0	0	0	0	0
134	2446	Processing of nuclear fuel	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
135	2451	Casting of iron	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
136	2452	Casting of steel	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
137	2453	Casting of light metals	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
138	2454	Casting of other nonferrous metals	0.03	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
139	2511	Manufacture of metal structures and parts of structures	0.42	0	0	0	0.02	0	0	0	0	0	0	0	0.12	0	0	0
140	2512	Manufacture of doors and windows of metal	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
141	2521	Manufacture of central heating radiators and boilers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
142	2529	Manufacture of other tanks, reservoirs and containers of metal	0.53	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
143	2540	Manufacture of weapons and ammunition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
144	2550	Forging, pressing, stamping and rollforming of metal; powder metallurgy	11.53	3.32	0	0	0	0	0	0	0	0	0	0	0	0	0	0
145	2561	Treatment and coating of metals	1.14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
146	2562	Machining	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
147	2571	Manufacture of cutlery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
148	2572	Manufacture of locks and hinges	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
149	2573	Manufacture of tools	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
150	2592	Manufacture of light metal packaging	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
151	2593	Manufacture of wire products, chain and springs	1.29	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

			Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)				Circular Economy (CE)			
152	2594	Manufacture of fasteners and screw machine products	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
153	2599	Manufacture of other fabricated metal products n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
154	2611	Manufacture of electronic components	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
155	2612	Manufacture of loaded electronic boards	0.32	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
156	2620	Repair of computers and peripheral equipment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
157	2630	Manufacture of communication equipment	0.07	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
158	2651	Manufacture of instruments and appliances for measuring, testing and navigation	0.03	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
159	2652	Manufacture of watches and clocks	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
160	2660	Manufacture of irradiation, electromedical and electrotherapeutic equipment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
161	2670	Manufacture of optical instruments and photographic equipment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
162	2711	Manufacture of electric motors, generators and transformers	25.35	1.52	0	0	0	0	0	0	0	0	0	0	0.12	0	0	0
163	2720	Manufacture of batteries and accumulators	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
164	2731	Manufacture of fibre optic cables	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
165	2732	Manufacture of other electronic and electric wires and cables	0.14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
166	2733	Manufacture of wiring devices	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
167	2751	Manufacture of electric domestic appliances	0.01	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
168	2811	Manufacture of engines and turbines, except aircraft, vehicle and cycle engines	0.09	0	0	0	0	0	0	0	0	0	0	0	0.03	0	0	0
169	2812	Manufacture of fluid power equipment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
170	2813	Manufacture of other pumps and compressors	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
171	2814	Manufacture of other taps and valves	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
172	2815	Manufacture of bearings, gears, gearing and driving elements	1.67	0	0	0	0	0	0	0	0	0	0	0	0.01	0	0	0
173	2821	Manufacture of ovens, furnaces and furnace burners	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
174	2822	Manufacture of lifting and handling equipment	10.07	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
175	2825	Manufacture of nondomestic cooling and ventilation equipment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
176	2829	Manufacture of other general purpose machinery n.e.c.	0.89	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
177	2830	Manufacture of agricultural and forestry machinery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
178	2841	Manufacture of metal forming machinery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
179	2849	Manufacture of other machine tools	0.14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
180	2891	Manufacture of machinery for metallurgy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
181	2892	Manufacture of machinery for mining, quarrying and construction	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
182	2893	Manufacture of machinery for food, beverage and tobacco processing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
183	2894	Manufacture of machinery for textile, apparel and leather production	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
184	2895	Manufacture of machinery for paper and paperboard production	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
185	2896	Manufacture of plastics and rubber machinery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
186	2899	Manufacture of other special purpose machinery n.e.c.	0.04	0	0	0	0	0	0	0	0	0	0	0	0.01	0	0	0
187	2910	Manufacture of motor vehicles	76.48	2.85	0	0	0	0	0	0	0	0	0	0	0.08	0	0	0
188	2920	Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semitrailers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
189	2931	Manufacture of electrical and electronic equipment for motor vehicles	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
190	2932	Manufacture of other parts and accessories for motor vehicles	94.92	24.73	0	0	0	0	0	0	0	0	0	0	2.38	2.24	0	0
191	3011	Building of ships and floating structures	7.94	3.54	0	0	0	0	0	0	0	0	0	0	0	0	0	0

			Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)				Circular Economy (CE)			
192	3020	Manufacture of railway locomotives and rolling stock	19.9	16.49	0	0	0	0	0	0	0	0	0	0	0.01	0	0	0
193	3030	Manufacture of air and spacecraft and related machinery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
194	3040	Manufacture of military fighting vehicles	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
195	3092	Manufacture of bicycles and invalid carriages	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
196	3099	Manufacture of other transport equipment n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
197	3101	Manufacture of office and shop furniture	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
198	3102	Manufacture of kitchen furniture	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
199	3103	Manufacture of mattresses	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
200	3109	Manufacture of other furniture	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
201	3213	Manufacture of imitation jewellery and related articles	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
202	3230	Manufacture of sports goods	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
203	3240	Manufacture of games and toys	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
204	3250	Manufacture of medical and dental instruments and supplies	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
205	3291	Manufacture of brooms and brushes	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
206	3299	Other manufacturing n.e.c.	0.31	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
207	3312	Repair of machinery	0	0	0	0	0	0	0	0	0	0	0	0	0.07	0	0	0
208	3314	Repair of electrical equipment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
209	3317	Repair and maintenance of other transport equipment	0.88	0.12	0	0	0	0	0	0	0	0	0	0	0	0	0	0
210	3320	Installation of industrial machinery and equipment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
211	3511	Production of electricity	1014.8	349.86	0	0	0.55	0.36	0	0	0.1	0.1	0	0	0.14	0	0	0
212	3512	Transmission of electricity	11.09	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
213	3513	Distribution of electricity	164.22	52.41	0	0	0	0	0	0	0	0	0	0	0	0	0	0
214	3514	Trade of electricity	115.55	0.07	0	0	0	0	0	0	0	0	0	0	0	0	0	0
215	3521	Manufacture of gas	11.26	6.37	0	0	0	0	0	0	0	0	0	0	0	0	0	0
216	3522	Distribution of gaseous fuels through mains	94.78	52.38	0	0	0	0	0	0	0	0	0	0	0	0	0	0
217	3523	Trade of gas through mains	47.62	37.23	0	0	1.48	0.76	0	0	0	0	0	0	0	0	0	0
218	3600	Water collection, treatment and supply	184.18	153.93	0	0	0.09	0	0	0	1.05	1.02	0	0	0.13	0.06	0	0
219	3811	Collection of non-hazardous waste	10.92	0.38	0	0	0.05	0	0	0	0.04	0.02	0	0	0.12	0.01	0	0
220	3821	Treatment and disposal of non-hazardous waste	1.6	0	0	0	0	0	0	0	0	0	0	0	0.02	0	0	0
221	3822	Treatment and disposal of hazardous waste	0.03	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
222	3831	Dismantling of wrecks	2.4	0	0	0	0	0	0	0	0	0	0	0	1.97	0	0	0
223	3832	Recovery of sorted materials	19.22	17.83	0	0	0	0	0	0	0	0	0	0	0	0	0	0
224	3900	Remediation activities and other waste management services	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
225	4110	Development of building projects	77.06	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
226	4120	Construction of residential and non-residential buildings	13.07	0	0	0	1.13	0	0	0	0.02	0	0	0	0.09	0	0	0
227	4211	Construction of roads and motorways	55.5	6	0	0	0.51	0.02	0	0	0.32	0.04	0	0	1.4	0	0	0
228	4212	Construction of railways and underground railways	335.18	204.94	0	0	0.01	0	0	0	0.03	0	0	0	0.35	0	0	0
229	4213	Construction of bridges and tunnels	10.16	0	0	0	0.33	0	0	0	0.07	0	0	0	0.15	0	0	0
230	4221	Construction of utility projects for fluids	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
231	4222	Construction of utility projects for electricity and telecommunications	19.55	6.59	0	0	0.02	0.01	0	0	0.2	0	0	0	0.1	0.01	0	0
232	4291	Construction of water projects	0.07	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
233	4299	Construction of other civil engineering projects n.e.c.	179.21	18.86	0	0	0.07	0.05	0	0	0.17	0.12	0	0	0.08	0	0	0

			Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)				Circular Economy (CE)			
234	4311	Demolition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
235	4312	Site preparation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
236	4321	Electrical installation	90.9	42.81	0	0	0.53	0.23	0	0	0.8	0.03	0	0	3.1	0.19	0	0
237	4322	Plumbing, heat and airconditioning installation	0.1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
238	4329	Other construction installation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
239	4333	Floor and wall covering	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
240	4334	Painting and glazing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
241	4339	Other building completion and finishing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
242	4391	Roofing activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
243	4399	Other specialised construction activities n.e.c.	41.02	4.55	0	0	0.85	0.36	0	0	0.31	0	0	0	1.45	0	0	0
244	4511	Sale of cars and light motor vehicles	12.67	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
245	4520	Maintenance and repair of motor vehicles	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
246	4531	Wholesale trade of motor vehicle parts and accessories	1.97	0	0	0	0	0	0	0	0	0	0	0	0.05	0	0	0
247	4532	Retail trade of motor vehicle parts and accessories	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
248	4540	Sale, maintenance and repair of motorcycles and related parts and accessories	6.25	0.08	0	0	0.01	0	0	0	0.01	0	0	0	0.02	0	0	0
249	4612	Agents involved in the sale of fuels, ores, metals and industrial chemicals	0.02	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
250	4613	Agents involved in the sale of timber and building materials	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
251	4615	Agents involved in the sale of furniture, household goods, hardware and ironmongery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
252	4616	Agents involved in the sale of textiles, clothing, fur, footwear and leather goods	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
253	4617	Agents involved in the sale of food, beverages and tobacco	0.18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
254	4618	Agents specialised in the sale of other particular products	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
255	4619	Agents involved in the sale of a variety of goods	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
256	4621	Wholesale of grain, unmanufactured tobacco, seeds and animal feeds	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
257	4622	Wholesale of flowers and plants	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
258	4623	Wholesale of live animals	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
259	4624	Wholesale of hides, skins and leather	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
260	4631	Wholesale of fruit and vegetables	0.74	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
261	4632	Wholesale of meat and meat products	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
262	4633	Wholesale of dairy products, eggs and edible oils and fats	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
263	4634	Wholesale of beverages	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
264	4635	Wholesale of tobacco products	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
265	4636	Wholesale of sugar and chocolate and sugar confectionery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
266	4637	Wholesale of coffee, tea, cocoa and spices	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
267	4638	Wholesale of other food, including fish, crustaceans and molluscs	2.81	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
268	4639	Nonspecialised wholesale of food, beverages and tobacco	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
269	4641	Wholesale of textiles	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
270	4642	Wholesale of clothing and footwear	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
271	4644	Wholesale of china and glassware and cleaning materials	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
272	4645	Wholesale of perfume and cosmetics	0.06	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
273	4646	Wholesale of pharmaceutical goods	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

			Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)				Circular Economy (CE)			
274	4647	Wholesale of furniture, carpets and lighting equipment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
275	4648	Wholesale of watches and jewellery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
276	4649	Wholesale of other household goods	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
277	4651	Wholesale of computers, computer peripheral equipment and software	0.05	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
278	4652	Wholesale of electronic and telecommunications equipment and parts	0.01	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
279	4661	Wholesale of agricultural machinery, equipment and supplies	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
280	4662	Wholesale of machine tools	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
281	4663	Wholesale of mining, construction and civil engineering machinery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
282	4664	Wholesale of machinery for the textile industry and of sewing and knitting machines	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
283	4665	Wholesale of office furniture	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
284	4666	Wholesale of other office machinery and equipment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
285	4669	Wholesale of other machinery and equipment	0.17	0	0	0	0	0	0	0	0	0	0	0	0.17	0	0	0
286	4671	Wholesale of solid, liquid and gaseous fuels and related products	0.39	0	0	0	0	0	0	0	0	0	0	0	0.01	0	0	0
287	4672	Wholesale of metals and metal ores	37.88	0.19	0	0	0	0	0	0	0	0	0	0	0	0	0	0
288	4673	Wholesale of wood, construction materials and sanitary equipment	0.96	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
289	4674	Wholesale of hardware, plumbing and heating equipment and supplies	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
290	4675	Wholesale of chemical products	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
291	4676	Wholesale of other intermediate products	3.94	2.82	0	0	0	0	0	0	0	0	0	0	4.49	0	0	0
292	4690	Nonspecialised wholesale trade	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
293	4711	Retail sale in nonspecialised stores with food, beverages or tobacco predominating	44.85	0	0	0	0	0	0	0	0.01	0	0	0	0.05	0	0	0
294	4719	Other retail sale in nonspecialised stores	0.19	0.03	0	0	0	0	0	0	0	0	0	0	0	0	0	0
295	4721	Retail sale of fruit and vegetables in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
296	4722	Retail sale of meat and meat products in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
297	4723	Retail sale of fish, crustaceans and molluscs in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
298	4724	Retail sale of bread, cakes, flour confectionery and sugar confectionery in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
299	4726	Retail sale of tobacco products in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
300	4729	Other retail sale of food in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
301	4730	Retail sale of automotive fuel in specialised stores	20.07	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
302	4741	Retail sale of computers, peripheral units and software in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
303	4742	Retail sale of telecommunications equipment in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
304	4751	Retail sale of textiles in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
305	4759	Retail sale of furniture, lighting equipment and other household articles in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
306	4761	Retail sale of books in specialised stores	0	0	0	0	0.04	0	0	0	0	0	0	0	0	0	0	0
307	4762	Retail sale of newspapers and stationery in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
308	4764	Retail sale of sporting equipment in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
309	4765	Retail sale of games and toys in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
310	4771	Retail sale of clothing in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
311	4772	Retail sale of footwear and leather goods in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
312	4774	Retail sale of medical and orthopaedic goods in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

			Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)				Circular Economy (CE)			
313	4775	Retail sale of cosmetic and toilet articles in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
314	4777	Retail sale of watches and jewellery in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
315	4781	Retail sale via stalls and markets of food, beverages and tobacco products	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
316	4782	Retail sale via stalls and markets of textiles, clothing and footwear	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
317	4791	Retail sale via mail order houses or via Internet	0.17	0.07	0	0	0	0	0	0	0	0	0	0	0	0	0	0
318	4799	Other retail sale not in stores, stalls or markets	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
319	4910	Passenger rail transport, interurban	549.13	475.69	0	0	0	0	0	0	0	0	0	0	0	0	0	0
320	4920	Freight rail transport	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
321	4931	Urban and suburban passenger land transport	175.82	152.82	0	0	0	0	0	0	0	0	0	0	0	0	0	0
322	4932	Taxi operation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
323	4939	Other passenger land transport n.e.c.	0.39	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
324	4941	Freight transport by road	2.99	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
325	4950	Transport via pipeline	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
326	5010	Sea and coastal passenger water transport	8.55	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
327	5020	Sea and coastal freight water transport	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
328	5040	Inland freight water transport	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
329	5110	Passenger air transport	0.94	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
330	5122	Space transport	0.09	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
331	5210	Warehousing and storage	0.08	0	0	0	0	0	0	0	0	0	0	0	0.01	0	0	0
332	5221	Service activities incidental to land transportation	49.72	9.17	0	0	0.06	0.02	0	0	0.39	0.04	0	0	1.97	0	0	0
333	5222	Service activities incidental to water transportation	0.01	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
334	5223	Service activities incidental to air transportation	129.24	98.35	0	0	0	0	0	0	0	0	0	0	0	0	0	0
335	5224	Cargo handling	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
336	5229	Other transportation support activities	0.01	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
337	5320	Other postal and courier activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
338	5510	Hotels and similar accommodation	196.71	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
339	5520	Holiday and other short-stay accommodation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
340	5530	Camping grounds, recreational vehicle parks and trailer parks	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
341	5590	Other accommodation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
342	5610	Restaurants and mobile food service activities	5.04	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
343	5621	Event catering activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
344	5629	Other food service activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
345	5630	Beverage serving activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
346	5811	Book publishing	0	0	0	0	0.15	0	0	0	0	0	0	0	0	0	0	0
347	5813	Publishing of newspapers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
348	5819	Other publishing activities	0.04	0	0	0	0.15	0	0	0	0	0	0	0	0	0	0	0
349	5821	Publishing of computer games	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
350	5829	Other software publishing	0.02	0	0	0	0	0	0	0	0	0	0	0	0.03	0	0	0
351	5912	Motion picture, video and television programme postproduction activities	0.13	0	0	0	0	0	0	0	0	0	0	0	0.06	0	0	0
352	6010	Radio broadcasting	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
353	6020	Television programming and broadcasting activities	0	0	0	0	8.66	0.02	0	0	0	0	0	0	0	0	0	0

			Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)				Circular Economy (CE)			
354	6110	Wired telecommunications activities	8	2.24	0	0	1.44	0	0	0	0	0	0	0	3.92	1.14	0	0
355	6120	Wireless telecommunications activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
356	6130	Satellite telecommunications activities	0.01	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
357	6190	Other telecommunications activities	4.1	1.64	0	0	2.87	1.27	0	0	0.14	0.14	0	0	1.82	0.94	0	0
358	6201	Computer programming activities	14.27	10.76	0	0	0.32	0.08	0	0	0	0	0	0	17.48	0	0	0
359	6202	Computer consultancy activities	0.31	0	0	0	2.35	0	0	0	0	0	0	0	0.15	0	0	0
360	6203	Computer facilities management activities	0.09	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
361	6209	Other information technology and computer service activities	0.03	0	0	0	0	0	0	0	0	0	0	0	0.01	0	0	0
362	6311	Data processing, hosting and related activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
363	6312	Web portals	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
364	6391	News agency activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
365	6399	Other information service activities n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
366	6419	Other monetary intermediation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
367	6420	Activities of holding companies	199.31	45.19	0	0	1.01	0.01	0	0	0.56	0.02	0	0	14.35	0.22	0	0
368	6430	Trusts, funds and similar financial entities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
369	6499	Other financial service activities, except insurance and pension funding n.e.c.	184.19	76.62	0	0	1.58	0.98	0	0	0.75	0.26	0	0	2.95	0.03	0	0
370	6619	Other activities auxiliary to financial services, except insurance and pension funding	384.87	377.78	0	0	0	0	0	0	0	0	0	0	0	0	0	0
371	6622	Activities of insurance agents and brokers	0	0	0	0	0.02	0	0	0	0	0	0	0	0	0	0	0
372	6810	Buying and selling of own real estate	7.84	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
373	6831	Real estate agencies	0.6	0.6	0	0	0	0	0	0	0	0	0	0	0	0	0	0
374	6832	Management of real estate on a fee or contract basis	0.09	0.01	0	0	0.44	0.2	0	0	0.02	0.02	0	0	0	0	0	0
375	6920	Accounting, bookkeeping and auditing activities; tax consultancy	27.24	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
376	7010	Activities of head offices	1.12	0.42	0	0	0	0	0	0	0	0	0	0	0	0	0	0
377	7021	Public relations and communication activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
378	7022	Business and other management consultancy activities	7	0.01	0	0	0	0	0	0	0	0	0	0	0	0	0	0
379	7111	Architectural activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
380	7112	Engineering activities and related technical consultancy	50.62	1.81	0	0	0.05	0	0	0	0.1	0.1	0	0	0.28	0.07	0	0
381	7120	Technical testing and analysis	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
382	7219	Other research and experimental development on natural sciences and engineering	0.1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
383	7220	Research and experimental development on social sciences and humanities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
384	7311	Advertising agencies	0.01	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
385	7410	Specialised design activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
386	7420	Photographic activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
387	7490	Other professional, scientific and technical activities n.e.c.	10.84	1.7	0	0	1.7	0.01	0	0	0.02	0.01	0	0	0	0	0	0
388	7500	Veterinary activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
389	7711	Renting and leasing of cars and light motor vehicles	10.44	0.3	0	0	0	0	0	0	0	0	0	0	4.67	0.1	0	0
390	7712	Renting and leasing of trucks	0	0	0	0	0	0	0	0	0	0	0	0	0.01	0	0	0
391	7732	Renting and leasing of construction and civil engineering machinery and equipment	0.12	0	0	0	0	0	0	0	0	0	0	0	1.94	0	0	0

			Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)				Circular Economy (CE)			
392	7733	Renting and leasing of office machinery and equipment (including computers)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
393	7734	Renting and leasing of water transport equipment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
394	7735	Renting and leasing of air transport equipment	4.05	0.37	0	0	0	0	0	0	0	0	0	0	0	0	0	0
395	7739	Renting and leasing of other machinery, equipment and tangible goods n.e.c.	9.98	0.01	0	0	1.19	0.54	0	0	0.06	0.06	0	0	0	0	0	0
396	7740	Leasing of intellectual property and similar products, except copyrighted works	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
397	7810	Activities of employment placement agencies	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
398	7820	Temporary employment agency activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
399	7830	Other human resources provision	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
400	7911	Travel agency activities	0.02	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
401	7912	Tour operator activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
402	7990	Other reservation service and related activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
403	8010	Private security activities	0.37	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
404	8020	Security systems service activities	14.96	0.94	0	0	0	0	0	0	0	0	0	0	0	0	0	0
405	8110	Combined facilities support activities	0.1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
406	8121	General cleaning of buildings	0.44	0.12	0	0	0	0	0	0	0	0	0	0	0	0	0	0
407	8122	Other building and industrial cleaning activities	2.25	0	0	0	0.07	0	0	0	0.01	0	0	0	0.02	0	0	0
408	8129	Other cleaning activities	0.13	0.05	0	0	0.02	0.02	0	0	0	0	0	0	0.05	0.04	0	0
409	8130	Landscape service activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
410	8211	Combined office administrative service activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
411	8219	Photocopying, document preparation and other specialised office support activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
412	8220	Activities of call centres	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
413	8230	Organisation of conventions and trade shows	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
414	8291	Activities of collection agencies and credit bureaus	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
415	8292	Packaging activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
416	8299	Other business support service activities n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
417	8412	Regulation of the activities of providing health care, education, cultural services and other social services, excluding social security	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
418	8424	Public order and safety activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
419	8520	Primary education	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
420	8531	General secondary education	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
421	8532	Technical and vocational secondary education	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
422	8541	Post-secondary non-tertiary education	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
423	8552	Cultural education	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
424	8559	Other education n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
425	8560	Educational support activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
426	8610	Hospital activities	14.07	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
427	8621	General medical practice activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
428	8622	Specialist medical practice activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
429	8623	Dental practice activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
430	8690	Other human health activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

			Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)				Circular Economy (CE)			
431	8710	Residential nursing care activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
432	8720	Residential care activities for mental retardation, mental health and substance abuse	0.39	0.06	0	0	0	0	0	0	0	0	0	0	0	0	0	0
433	8730	Residential care activities for the elderly and disabled	0.38	0	0	0	0.28	0.04	0	0	0	0	0	0	0	0	0	0
434	8790	Other residential care activities	0	0	0	0	4.7	0	0	0	0	0	0	0	0	0	0	0
435	8810	Social work activities without accommodation for the elderly and disabled	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
436	8891	Child daycare activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
437	8899	Other social work activities without accommodation n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
438	9001	Performing arts	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
439	9003	Artistic creation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
440	9004	Operation of arts facilities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
441	9200	Gambling and betting activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
442	9311	Operation of sports facilities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
443	9312	Activities of sport clubs	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
444	9313	Fitness facilities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
445	9319	Other sports activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
446	9321	Activities of amusement parks and theme parks	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
447	9329	Other amusement and recreation activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
448	9499	Activities of other membership organisations n.e.c.	1.91	0	0	0	0.01	0	0	0	0.01	0	0	0	0	0	0	0
449	9512	Repair of communication equipment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
450	9521	Repair of consumer electronics	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
451	9601	Washing and (dry)cleaning of textile and fur products	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
452	9602	Hairdressing and other beauty treatment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
453	9603	Funeral and related activities	0.97	0	0	0	0.95	0.14	0	0	0	0	0	0	0	0	0	0
454	9604	Physical wellbeing activities	0.01	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
455	9700	Activities of households as employers of domestic personnel	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
456	9820	Undifferentiated service-producing activities of private households for own use	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
457	9900	Activities of extraterritorial organisations and bodies	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
458	8810	Social work activities without accommodation for the elderly and disabled	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
459	8891	Child daycare activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
460	8899	Other social work activities without accommodation n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
461	9001	Performing arts	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
462	9003	Artistic creation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
463	9004	Operation of arts facilities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
464	9200	Gambling and betting activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
465	9311	Operation of sports facilities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
466	9312	Activities of sport clubs	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
467	9313	Fitness facilities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
468	9319	Other sports activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
469	9321	Activities of amusement parks and theme parks	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
470	9329	Other amusement and recreation activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
471	9499	Activities of other membership organisations n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

			Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)				Circular Economy (CE)			
472	9512	Repair of communication equipment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
473	9521	Repair of consumer electronics	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
474	9601	Washing and (dry)cleaning of textile and fur products	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
475	9602	Hairdressing and other beauty treatment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
476	9603	Funeral and related activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
477	9604	Physical wellbeing activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
478	9609	Other personal service activities n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
479	9700	Activities of households as employers of domestic personnel	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
480	9820	Undifferentiated service-producing activities of private households for own use	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
481	9900	Activities of extraterritorial organisations and bodies	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0



Breakdown by sector - NACE 4 digits level (code and label)			Pollution Prevention and Control (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
			Non-financial corporations (subject to NFRD disclosure obligations)		SMEs and other NFCs not subject to NFRD		Non-financial corporations (subject to NFRD disclosure obligations)		SMEs and other NFCs not subject to NFRD		Non-financial corporations (subject to NFRD disclosure obligations)		SMEs and other NFCs not subject to NFRD	
			Carrying amount [gross]		Carrying amount [gross]		Carrying amount [gross]		Carrying amount [gross]		Carrying amount [gross]		Carrying amount [gross]	
			Million EUR	Of which environmentally sustainable (PPC)	Million EUR	Of which environmentally sustainable (PPC)	Million EUR	Of which environmentally sustainable (BIO)	Million EUR	Of which environmentally sustainable (BIO)	Million EUR	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Million EUR	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
1	111	Growing of cereals (except rice), leguminous crops and oil seeds	0	0	0	0	0	0	0	0	0	0	0	0
2	113	Growing of vegetables and melons, roots and tubers	0	0	0	0	0	0	0	0	0	0	0	0
3	119	Growing of other nonperennial crops	0	0	0	0	0	0	0	0	0	0	0	0
4	121	Growing of grapes	0	0	0	0	0	0	0	0	0	0	0	0
5	122	Growing of tropical and subtropical fruits	0	0	0	0	0	0	0	0	0	0	0	0
6	123	Growing of citrus fruits	0	0	0	0	0	0	0	0	0	0	0	0
7	124	Growing of pome fruits and stone fruits	0	0	0	0	0	0	0	0	0	0	0	0
8	125	Growing of other tree and bush fruits and nuts	0	0	0	0	0	0	0	0	0	0	0	0
9	126	Growing of oleaginous fruits	0	0	0	0	0	0	0	0	0	0	0	0
10	142	Raising of other cattle and buffaloes	0	0	0	0	0	0	0	0	0	0	0	0
11	143	Raising of horses and other equines	0	0	0	0	0	0	0	0	0	0	0	0
12	145	Raising of sheep and goats	0	0	0	0	0	0	0	0	0	0	0	0
13	146	Raising of swine/pigs	0	0	0	0	0	0	0	0	1.56	1.11	0	0
14	147	Raising of poultry	0	0	0	0	0	0	0	0	0	0	0	0
15	149	Raising of other animals	0	0	0	0	0	0	0	0	0	0	0	0
16	150	Mixed farming	0	0	0	0	0	0	0	0	0	0	0	0
17	161	Support activities for crop production	0	0	0	0	0	0	0	0	0	0	0	0
18	162	Support activities for animal production	0	0	0	0	0	0	0	0	0.21	0.19	0	0
19	210	Silviculture and other forestry activities	0	0	0	0	0	0	0	0	0.62	0	0	0
20	220	Logging	0	0	0	0	0	0	0	0	0	0	0	0
21	311	Marine fishing	0	0	0	0	0	0	0	0	0	0	0	0
22	321	Marine aquaculture	0	0	0	0	0	0	0	0	0	0	0	0
23	322	Freshwater aquaculture	0	0	0	0	0	0	0	0	0	0	0	0
24	510	Mining of hard coal	0	0	0	0	0	0	0	0	0	0	0	0
25	610	Extraction of crude petroleum	0	0	0	0	0	0	0	0	2.15	0.25	0	0
26	729	Mining of other nonferrous metal ores	0	0	0	0	0	0	0	0	0.54	0	0	0
27	891	Mining of chemical and fertiliser minerals	0	0	0	0	0	0	0	0	0	0	0	0
28	893	Extraction of salt	0	0	0	0	0	0	0	0	0	0	0	0
29	899	Other mining and quarrying n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0
30	1011	Processing and preserving of meat	0	0	0	0	0	0	0	0	0	0	0	0
31	1012	Processing and preserving of poultry meat	0	0	0	0	0	0	0	0	0	0	0	0
32	1013	Production of meat and poultry meat products	0	0	0	0	0	0	0	0	0	0	0	0
33	1020	Processing and preserving of fish, crustaceans and molluscs	0	0	0	0	0	0	0	0	0	0	0	0
34	1032	Manufacture of fruit and vegetable juice	0	0	0	0	0	0	0	0	0	0	0	0

			Pollution Prevention and Control (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
35	1039	Other processing and preserving of fruit and vegetables	0	0	0	0	0	0	0	0	0	0	0	0
36	1041	Manufacture of oils and fats	0	0	0	0	0	0	0	0	0	0	0	0
37	1042	Manufacture of margarine and similar edible fats	0	0	0	0	0	0	0	0	0	0	0	0
38	1051	Operation of dairies and cheese making	0	0	0	0	0	0	0	0	0	0	0	0
39	1052	Manufacture of ice cream	0	0	0	0	0	0	0	0	0	0	0	0
40	1061	Manufacture of grain mill products	0	0	0	0	0	0	0	0	0	0	0	0
41	1071	Manufacture of bread; manufacture of fresh pastry goods and cakes	0	0	0	0	0	0	0	0	0	0	0	0
42	1072	Manufacture of rusks and biscuits; manufacture of preserved pastry goods and cakes	0	0	0	0	0	0	0	0	0	0	0	0
43	1073	Manufacture of macaroni, noodles, couscous and similar farinaceous products	0	0	0	0	0	0	0	0	0	0	0	0
44	1081	Manufacture of sugar	0	0	0	0	0	0	0	0	0	0	0	0
45	1082	Manufacture of cocoa, chocolate and sugar confectionery	0	0	0	0	0	0	0	0	0	0	0	0
46	1084	Manufacture of condiments and seasonings	0	0	0	0	0	0	0	0	0	0	0	0
47	1085	Manufacture of prepared meals and dishes	0	0	0	0	0	0	0	0	0	0	0	0
48	1086	Manufacture of homogenised food preparations and dietetic food	0	0	0	0	0	0	0	0	0.26	0	0	0
49	1089	Manufacture of other food products n.e.c.	0	0	0	0	0	0	0	0	1.63	0.05	0	0
50	1091	Manufacture of prepared feeds for farm animals	0	0	0	0	0	0	0	0	0	0	0	0
51	1092	Manufacture of prepared pet foods	0	0	0	0	0	0	0	0	0	0	0	0
52	1101	Distilling, rectifying and blending of spirits	0	0	0	0	0	0	0	0	0	0	0	0
53	1102	Manufacture of wine from grape	0	0	0	0	0	0	0	0	0.32	0.04	0	0
54	1105	Manufacture of beer	0	0	0	0	0	0	0	0	0	0	0	0
55	1106	Manufacture of malt	0	0	0	0	0	0	0	0	0	0	0	0
56	1107	Manufacture of soft drinks; production of mineral waters and other bottled waters	0	0	0	0	0	0	0	0	0	0	0	0
57	1200	Manufacture of tobacco products	0	0	0	0	0	0	0	0	0	0	0	0
58	1310	Preparation and spinning of textile fibres	0	0	0	0	0	0	0	0	0	0	0	0
59	1320	Weaving of textiles	0	0	0	0	0	0	0	0	0	0	0	0
60	1330	Finishing of textiles	0	0	0	0	0	0	0	0	0	0	0	0
61	1391	Manufacture of knitted and crocheted fabrics	0	0	0	0	0	0	0	0	0	0	0	0
62	1392	Manufacture of madeup textile articles, except apparel	0	0	0	0	0	0	0	0	0	0	0	0
63	1395	Manufacture of non-wovens and articles made from non-wovens, except apparel	0	0	0	0	0	0	0	0	0	0	0	0
64	1396	Manufacture of other technical and industrial textiles	0	0	0	0	0	0	0	0	0	0	0	0
65	1399	Manufacture of other textiles n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0
66	1412	Manufacture of workwear	0	0	0	0	0	0	0	0	0.01	0	0	0
67	1413	Manufacture of other outerwear	0	0	0	0	0	0	0	0	0	0	0	0
68	1419	Manufacture of other wearing apparel and accessories	0	0	0	0	0	0	0	0	0	0	0	0
69	1431	Manufacture of knitted and crocheted hosiery	0	0	0	0	0	0	0	0	0	0	0	0
70	1439	Manufacture of other knitted and crocheted apparel	0	0	0	0	0	0	0	0	0	0	0	0
71	1511	Tanning and dressing of leather; dressing and dyeing of fur	0	0	0	0	0	0	0	0	0	0	0	0
72	1520	Manufacture of footwear	0	0	0	0	0	0	0	0	0	0	0	0
73	1610	Sawmilling and planing of wood	0	0	0	0	0	0	0	0	0	0	0	0
74	1621	Manufacture of veneer sheets and woodbased panels	0	0	0	0	0	0	0	0	0	0	0	0
75	1623	Manufacture of other builders' carpentry and joinery	0	0	0	0	0	0	0	0	0	0	0	0

			Pollution Prevention and Control (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
76	1624	Manufacture of wooden containers	0	0	0	0	0	0	0	0	0.46	0.05	0	0
77	1629	Manufacture of other products of wood; manufacture of articles of cork, straw and plaiting materials	0	0	0	0	0	0	0	0	0.03	0	0	0
78	1711	Manufacture of pulp	0	0	0	0	0	0	0	0	10.57	10.37	0	0
79	1712	Manufacture of paper and paperboard	0	0	0	0	0	0	0	0	0.01	0	0	0
80	1721	Manufacture of corrugated paper and paperboard and of containers of paper and paperboard	0	0	0	0	0	0	0	0	0	0	0	0
81	1722	Manufacture of household and sanitary goods and of toilet requisites	0	0	0	0	0	0	0	0	0.01	0	0	0
82	1723	Manufacture of paper stationery	0	0	0	0	0	0	0	0	0	0	0	0
83	1729	Manufacture of other articles of paper and paperboard	0	0	0	0	0	0	0	0	0	0	0	0
84	1811	Printing of newspapers	0	0	0	0	0	0	0	0	0	0	0	0
85	1812	Other printing	0	0	0	0	0	0	0	0	0	0	0	0
86	1920	Manufacture of refined petroleum products	0	0	0	0	0	0	0	0	2.59	0.11	0	0
87	2011	Manufacture of industrial gases	0	0	0	0	0	0	0	0	0	0	0	0
88	2012	Manufacture of dyes and pigments	0	0	0	0	0	0	0	0	0	0	0	0
89	2013	Manufacture of other inorganic basic chemicals	1.15	0	0	0	0	0	0	0	6.45	1.17	0	0
90	2014	Manufacture of other organic basic chemicals	0	0	0	0	0	0	0	0	0.84	0.01	0	0
91	2015	Manufacture of fertilisers and nitrogen compounds	0	0	0	0	0	0	0	0	0.72	0.05	0	0
92	2016	Manufacture of plastics in primary forms	0	0	0	0	0	0	0	0	0.01	0	0	0
93	2017	Manufacture of synthetic rubber in primary forms	0	0	0	0	0	0	0	0	0.69	0	0	0
94	2020	Manufacture of pesticides and other agrochemical products	0	0	0	0	0	0	0	0	0	0	0	0
95	2030	Manufacture of paints, varnishes and similar coatings, printing ink and mastics	0	0	0	0	0	0	0	0	0	0	0	0
96	2041	Manufacture of soap and detergents, cleaning and polishing preparations	0	0	0	0	0	0	0	0	0	0	0	0
97	2042	Manufacture of perfumes and toilet preparations	0	0	0	0	0	0	0	0	0	0	0	0
98	2051	Manufacture of explosives	0	0	0	0	0	0	0	0	0	0	0	0
99	2052	Manufacture of glues	0	0	0	0	0	0	0	0	0	0	0	0
100	2059	Manufacture of other chemical products n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0
101	2060	Manufacture of manmade fibres	0	0	0	0	0	0	0	0	0	0	0	0
102	2110	Manufacture of basic pharmaceutical products	0.01	0	0	0	0	0	0	0	0.01	0	0	0
103	2120	Manufacture of pharmaceutical preparations	40.98	0	0	0	0	0	0	0	41.06	0	0	0
104	2211	Manufacture of rubber tyres and tubes; retreading and rebuilding of rubber tyres	0	0	0	0	0	0	0	0	0.85	0	0	0
105	2219	Manufacture of other rubber products	0	0	0	0	0	0	0	0	0	0	0	0
106	2221	Manufacture of plastic plates, sheets, tubes and profiles	0	0	0	0	0	0	0	0	0	0	0	0
107	2222	Manufacture of plastic packing goods	0	0	0	0	0	0	0	0	4.33	0	0	0
108	2223	Manufacture of builders' ware of plastic	0	0	0	0	0	0	0	0	0	0	0	0
109	2229	Manufacture of other plastic products	0	0	0	0	0	0	0	0	1.7	1.42	0	0
110	2311	Manufacture of flat glass	0	0	0	0	0	0	0	0	0	0	0	0
111	2313	Manufacture of hollow glass	0	0	0	0	0	0	0	0	0	0	0	0
112	2314	Manufacture of glass fibres	0	0	0	0	0	0	0	0	0.01	0	0	0
113	2320	Manufacture of refractory products	0	0	0	0	0	0	0	0	0.03	0	0	0
114	2331	Manufacture of ceramic tiles and flags	0	0	0	0	0	0	0	0	0.03	0	0	0
115	2332	Manufacture of bricks, tiles and construction products, in baked clay	0	0	0	0	0	0	0	0	0	0	0	0
116	2342	Manufacture of ceramic sanitary fixtures	0	0	0	0	0	0	0	0	0	0	0	0

			Pollution Prevention and Control (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
117	2344	Manufacture of other technical ceramic products	0	0	0	0	0	0	0	0	0	0	0	0
118	2349	Manufacture of other ceramic products	0	0	0	0	0	0	0	0	0	0	0	0
119	2351	Manufacture of cement	0	0	0	0	0	0	0	0	11.77	0.79	0	0
120	2352	Manufacture of lime and plaster	0	0	0	0	0	0	0	0	2.51	0	0	0
121	2361	Manufacture of concrete products for construction purposes	0	0	0	0	0	0	0	0	0.07	0	0	0
122	2364	Manufacture of mortars	0	0	0	0	0	0	0	0	0	0	0	0
123	2370	Cutting, shaping and finishing of stone	0	0	0	0	0	0	0	0	0	0	0	0
124	2399	Manufacture of other non-metallic mineral products n.e.c.	0	0	0	0	0	0	0	0	1.99	0	0	0
125	2410	Manufacture of basic iron and steel and of ferroalloys	0	0	0	0	0	0	0	0	40.44	7.18	0	0
126	2431	Cold drawing of bars	0	0	0	0	0	0	0	0	0	0	0	0
127	2432	Cold rolling of narrow strip	0	0	0	0	0	0	0	0	0	0	0	0
128	2433	Cold forming or folding	0	0	0	0	0	0	0	0	0	0	0	0
129	2434	Cold drawing of wire	0	0	0	0	0	0	0	0	0	0	0	0
130	2442	Aluminium production	0	0	0	0	0	0	0	0	13.37	0	0	0
131	2443	Lead, zinc and tin production	0	0	0	0	0	0	0	0	0	0	0	0
132	2444	Copper production	0	0	0	0	0	0	0	0	0	0	0	0
133	2445	Other nonferrous metal production	0	0	0	0	0	0	0	0	251	234.51	0	0
134	2446	Processing of nuclear fuel	0	0	0	0	0	0	0	0	0	0	0	0
135	2451	Casting of iron	0	0	0	0	0	0	0	0	0	0	0	0
136	2452	Casting of steel	0	0	0	0	0	0	0	0	0	0	0	0
137	2453	Casting of light metals	0	0	0	0	0	0	0	0	0	0	0	0
138	2454	Casting of other nonferrous metals	0	0	0	0	0	0	0	0	0.03	0	0	0
139	2511	Manufacture of metal structures and parts of structures	0	0	0	0	0	0	0	0	0.56	0	0	0
140	2512	Manufacture of doors and windows of metal	0	0	0	0	0	0	0	0	0	0	0	0
141	2521	Manufacture of central heating radiators and boilers	0	0	0	0	0	0	0	0	0	0	0	0
142	2529	Manufacture of other tanks, reservoirs and containers of metal	0	0	0	0	0	0	0	0	0.53	0	0	0
143	2540	Manufacture of weapons and ammunition	0	0	0	0	0	0	0	0	0	0	0	0
144	2550	Forging, pressing, stamping and rollforming of metal; powder metallurgy	0	0	0	0	0	0	0	0	11.54	3.32	0	0
145	2561	Treatment and coating of metals	0	0	0	0	0	0	0	0	1.14	0	0	0
146	2562	Machining	0	0	0	0	0	0	0	0	0	0	0	0
147	2571	Manufacture of cutlery	0	0	0	0	0	0	0	0	0	0	0	0
148	2572	Manufacture of locks and hinges	0	0	0	0	0	0	0	0	0	0	0	0
149	2573	Manufacture of tools	0	0	0	0	0	0	0	0	0	0	0	0
150	2592	Manufacture of light metal packaging	0	0	0	0	0	0	0	0	0	0	0	0
151	2593	Manufacture of wire products, chain and springs	0	0	0	0	0	0	0	0	1.29	0	0	0
152	2594	Manufacture of fasteners and screw machine products	0	0	0	0	0	0	0	0	0	0	0	0
153	2599	Manufacture of other fabricated metal products n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0
154	2611	Manufacture of electronic components	0	0	0	0	0	0	0	0	0	0	0	0
155	2612	Manufacture of loaded electronic boards	0	0	0	0	0	0	0	0	0.32	0	0	0
156	2620	Repair of computers and peripheral equipment	0	0	0	0	0	0	0	0	0	0	0	0
157	2630	Manufacture of communication equipment	0	0	0	0	0	0	0	0	0.07	0	0	0
158	2651	Manufacture of instruments and appliances for measuring, testing and navigation	0	0	0	0	0	0	0	0	0.03	0	0	0

			Pollution Prevention and Control (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
159	2652	Manufacture of watches and clocks	0	0	0	0	0	0	0	0	0	0	0	0
160	2660	Manufacture of irradiation, electromedical and electrotherapeutic equipment	0	0	0	0	0	0	0	0	0	0	0	0
161	2670	Manufacture of optical instruments and photographic equipment	0	0	0	0	0	0	0	0	0	0	0	0
162	2711	Manufacture of electric motors, generators and transformers	0	0	0	0	0	0	0	0	25.47	1.52	0	0
163	2720	Manufacture of batteries and accumulators	0	0	0	0	0	0	0	0	0	0	0	0
164	2731	Manufacture of fibre optic cables	0	0	0	0	0	0	0	0	0	0	0	0
165	2732	Manufacture of other electronic and electric wires and cables	0	0	0	0	0	0	0	0	0.14	0	0	0
166	2733	Manufacture of wiring devices	0	0	0	0	0	0	0	0	0	0	0	0
167	2751	Manufacture of electric domestic appliances	0	0	0	0	0	0	0	0	0.01	0	0	0
168	2811	Manufacture of engines and turbines, except aircraft, vehicle and cycle engines	0	0	0	0	0	0	0	0	0.12	0	0	0
169	2812	Manufacture of fluid power equipment	0	0	0	0	0	0	0	0	0	0	0	0
170	2813	Manufacture of other pumps and compressors	0	0	0	0	0	0	0	0	0	0	0	0
171	2814	Manufacture of other taps and valves	0	0	0	0	0	0	0	0	0	0	0	0
172	2815	Manufacture of bearings, gears, gearing and driving elements	0	0	0	0	0	0	0	0	1.67	0	0	0
173	2821	Manufacture of ovens, furnaces and furnace burners	0	0	0	0	0	0	0	0	0	0	0	0
174	2822	Manufacture of lifting and handling equipment	0	0	0	0	0	0	0	0	10.07	0	0	0
175	2825	Manufacture of nondomestic cooling and ventilation equipment	0	0	0	0	0	0	0	0	0	0	0	0
176	2829	Manufacture of other general purpose machinery n.e.c.	0	0	0	0	0	0	0	0	0.89	0	0	0
177	2830	Manufacture of agricultural and forestry machinery	0	0	0	0	0	0	0	0	0	0	0	0
178	2841	Manufacture of metal forming machinery	0	0	0	0	0	0	0	0	0	0	0	0
179	2849	Manufacture of other machine tools	0	0	0	0	0	0	0	0	0.14	0	0	0
180	2891	Manufacture of machinery for metallurgy	0	0	0	0	0	0	0	0	0	0	0	0
181	2892	Manufacture of machinery for mining, quarrying and construction	0	0	0	0	0	0	0	0	0	0	0	0
182	2893	Manufacture of machinery for food, beverage and tobacco processing	0	0	0	0	0	0	0	0	0	0	0	0
183	2894	Manufacture of machinery for textile, apparel and leather production	0	0	0	0	0	0	0	0	0	0	0	0
184	2895	Manufacture of machinery for paper and paperboard production	0	0	0	0	0	0	0	0	0	0	0	0
185	2896	Manufacture of plastics and rubber machinery	0	0	0	0	0	0	0	0	0	0	0	0
186	2899	Manufacture of other special purpose machinery n.e.c.	0	0	0	0	0	0	0	0	0.05	0	0	0
187	2910	Manufacture of motor vehicles	0	0	0	0	0	0	0	0	76.55	2.85	0	0
188	2920	Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semitrailers	0	0	0	0	0	0	0	0	0	0	0	0
189	2931	Manufacture of electrical and electronic equipment for motor vehicles	0	0	0	0	0	0	0	0	0.01	0	0	0
190	2932	Manufacture of other parts and accessories for motor vehicles	0	0	0	0	0	0	0	0	97.3	26.97	0	0
191	3011	Building of ships and floating structures	0	0	0	0	0	0	0	0	7.94	3.54	0	0
192	3020	Manufacture of railway locomotives and rolling stock	0	0	0	0	0	0	0	0	19.91	16.49	0	0
193	3030	Manufacture of air and spacecraft and related machinery	0	0	0	0	0	0	0	0	0	0	0	0
194	3040	Manufacture of military fighting vehicles	0	0	0	0	0	0	0	0	0	0	0	0
195	3092	Manufacture of bicycles and invalid carriages	0	0	0	0	0	0	0	0	0	0	0	0
196	3099	Manufacture of other transport equipment n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0
197	3101	Manufacture of office and shop furniture	0	0	0	0	0	0	0	0	0	0	0	0
198	3102	Manufacture of kitchen furniture	0	0	0	0	0	0	0	0	0	0	0	0
199	3103	Manufacture of mattresses	0	0	0	0	0	0	0	0	0	0	0	0

			Pollution Prevention and Control (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
200	3109	Manufacture of other furniture	0	0	0	0	0	0	0	0	0	0	0	0
201	3213	Manufacture of imitation jewellery and related articles	0	0	0	0	0	0	0	0	0	0	0	0
202	3230	Manufacture of sports goods	0	0	0	0	0	0	0	0	0	0	0	0
203	3240	Manufacture of games and toys	0	0	0	0	0	0	0	0	0	0	0	0
204	3250	Manufacture of medical and dental instruments and supplies	0	0	0	0	0	0	0	0	0	0	0	0
205	3291	Manufacture of brooms and brushes	0	0	0	0	0	0	0	0	0	0	0	0
206	3299	Other manufacturing n.e.c.	0	0	0	0	0	0	0	0	0.32	0	0	0
207	3312	Repair of machinery	0	0	0	0	0	0	0	0	0.07	0	0	0
208	3314	Repair of electrical equipment	0	0	0	0	0	0	0	0	0	0	0	0
209	3317	Repair and maintenance of other transport equipment	0	0	0	0	0	0	0	0	0.89	0.12	0	0
210	3320	Installation of industrial machinery and equipment	0	0	0	0	0	0	0	0	0	0	0	0
211	3511	Production of electricity	0	0	0	0	0	0	0	0	1015.59	350.32	0	0
212	3512	Transmission of electricity	0	0	0	0	0	0	0	0	11.09	0	0	0
213	3513	Distribution of electricity	0	0	0	0	0	0	0	0	164.22	52.41	0	0
214	3514	Trade of electricity	0	0	0	0	0	0	0	0	115.55	0.07	0	0
215	3521	Manufacture of gas	0	0	0	0	0	0	0	0	11.26	6.37	0	0
216	3522	Distribution of gaseous fuels through mains	0	0	0	0	0	0	0	0	94.78	52.38	0	0
217	3523	Trade of gas through mains	0	0	0	0	0	0	0	0	49.1	37.99	0	0
218	3600	Water collection, treatment and supply	0.28	0.17	0	0	0.01	0	0	0	185.73	155.2	0	0
219	3811	Collection of non-hazardous waste	0.01	0	0	0	0.02	0	0	0	11.16	0.41	0	0
220	3821	Treatment and disposal of non-hazardous waste	0	0	0	0	0	0	0	0	1.62	0	0	0
221	3822	Treatment and disposal of hazardous waste	0	0	0	0	0	0	0	0	0.04	0	0	0
222	3831	Dismantling of wrecks	0	0	0	0	0	0	0	0	4.36	0	0	0
223	3832	Recovery of sorted materials	0	0	0	0	0	0	0	0	19.22	17.83	0	0
224	3900	Remediation activities and other waste management services	0	0	0	0	0	0	0	0	0.01	0	0	0
225	4110	Development of building projects	0	0	0	0	29.19	0	0	0	106.26	0	0	0
226	4120	Construction of residential and non-residential buildings	0	0	0	0	0	0	0	0	14.31	0	0	0
227	4211	Construction of roads and motorways	0.03	0	0	0	0.01	0	0	0	57.77	6.06	0	0
228	4212	Construction of railways and underground railways	0	0	0	0	0	0	0	0	335.57	204.94	0	0
229	4213	Construction of bridges and tunnels	0	0	0	0	0	0	0	0	10.71	0	0	0
230	4221	Construction of utility projects for fluids	0	0	0	0	0	0	0	0	0	0	0	0
231	4222	Construction of utility projects for electricity and telecommunications	0	0	0	0	0.01	0	0	0	19.89	6.61	0	0
232	4291	Construction of water projects	0	0	0	0	0	0	0	0	0.08	0	0	0
233	4299	Construction of other civil engineering projects n.e.c.	0.07	0	0	0	0	0	0	0	179.61	19.03	0	0
234	4311	Demolition	0	0	0	0	0	0	0	0	0	0	0	0
235	4312	Site preparation	0	0	0	0	0	0	0	0	0	0	0	0
236	4321	Electrical installation	0.02	0	0	0	0.06	0	0	0	95.41	43.26	0	0
237	4322	Plumbing, heat and airconditioning installation	0	0	0	0	0	0	0	0	0.11	0	0	0
238	4329	Other construction installation	0	0	0	0	0	0	0	0	0	0	0	0
239	4333	Floor and wall covering	0	0	0	0	0	0	0	0	0	0	0	0
240	4334	Painting and glazing	0	0	0	0	0	0	0	0	0	0	0	0
241	4339	Other building completion and finishing	0	0	0	0	0	0	0	0	0	0	0	0

			Pollution Prevention and Control (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
242	4391	Roofing activities	0	0	0	0	0	0	0	0	0	0	0	0
243	4399	Other specialised construction activities n.e.c.	0	0	0	0	0	0	0	0	43.63	4.91	0	0
244	4511	Sale of cars and light motor vehicles	0	0	0	0	0	0	0	0	12.67	0	0	0
245	4520	Maintenance and repair of motor vehicles	0	0	0	0	0	0	0	0	0	0	0	0
246	4531	Wholesale trade of motor vehicle parts and accessories	0	0	0	0	0	0	0	0	2.02	0	0	0
247	4532	Retail trade of motor vehicle parts and accessories	0	0	0	0	0	0	0	0	0	0	0	0
248	4540	Sale, maintenance and repair of motorcycles and related parts and accessories	0	0	0	0	0	0	0	0	6.29	0.08	0	0
249	4612	Agents involved in the sale of fuels, ores, metals and industrial chemicals	0	0	0	0	0	0	0	0	0.02	0	0	0
250	4613	Agents involved in the sale of timber and building materials	0	0	0	0	0	0	0	0	0	0	0	0
251	4615	Agents involved in the sale of furniture, household goods, hardware and ironmongery	0	0	0	0	0	0	0	0	0	0	0	0
252	4616	Agents involved in the sale of textiles, clothing, fur, footwear and leather goods	0	0	0	0	0	0	0	0	0	0	0	0
253	4617	Agents involved in the sale of food, beverages and tobacco	0	0	0	0	0	0	0	0	0.18	0	0	0
254	4618	Agents specialised in the sale of other particular products	0	0	0	0	0	0	0	0	0	0	0	0
255	4619	Agents involved in the sale of a variety of goods	0	0	0	0	0	0	0	0	0	0	0	0
256	4621	Wholesale of grain, unmanufactured tobacco, seeds and animal feeds	0	0	0	0	0	0	0	0	0	0	0	0
257	4622	Wholesale of flowers and plants	0	0	0	0	0	0	0	0	0	0	0	0
258	4623	Wholesale of live animals	0	0	0	0	0	0	0	0	0	0	0	0
259	4624	Wholesale of hides, skins and leather	0	0	0	0	0	0	0	0	0	0	0	0
260	4631	Wholesale of fruit and vegetables	0	0	0	0	0	0	0	0	0.74	0	0	0
261	4632	Wholesale of meat and meat products	0	0	0	0	0	0	0	0	0	0	0	0
262	4633	Wholesale of dairy products, eggs and edible oils and fats	0	0	0	0	0	0	0	0	0	0	0	0
263	4634	Wholesale of beverages	0	0	0	0	0	0	0	0	0	0	0	0
264	4635	Wholesale of tobacco products	0	0	0	0	0	0	0	0	0	0	0	0
265	4636	Wholesale of sugar and chocolate and sugar confectionery	0	0	0	0	0	0	0	0	0	0	0	0
266	4637	Wholesale of coffee, tea, cocoa and spices	0	0	0	0	0	0	0	0	0	0	0	0
267	4638	Wholesale of other food, including fish, crustaceans and molluscs	0	0	0	0	0	0	0	0	2.81	0	0	0
268	4639	Nonspecialised wholesale of food, beverages and tobacco	0	0	0	0	0	0	0	0	0	0	0	0
269	4641	Wholesale of textiles	0	0	0	0	0	0	0	0	0	0	0	0
270	4642	Wholesale of clothing and footwear	0	0	0	0	0	0	0	0	0	0	0	0
271	4644	Wholesale of china and glassware and cleaning materials	0	0	0	0	0	0	0	0	0	0	0	0
272	4645	Wholesale of perfume and cosmetics	0	0	0	0	0	0	0	0	0.06	0	0	0
273	4646	Wholesale of pharmaceutical goods	0	0	0	0	0	0	0	0	0	0	0	0
274	4647	Wholesale of furniture, carpets and lighting equipment	0	0	0	0	0	0	0	0	0	0	0	0
275	4648	Wholesale of watches and jewellery	0	0	0	0	0	0	0	0	0	0	0	0
276	4649	Wholesale of other household goods	0	0	0	0	0	0	0	0	0	0	0	0
277	4651	Wholesale of computers, computer peripheral equipment and software	0	0	0	0	0	0	0	0	0.06	0	0	0
278	4652	Wholesale of electronic and telecommunications equipment and parts	0	0	0	0	0	0	0	0	0.01	0	0	0
279	4661	Wholesale of agricultural machinery, equipment and supplies	0	0	0	0	0	0	0	0	0	0	0	0
280	4662	Wholesale of machine tools	0	0	0	0	0	0	0	0	0	0	0	0
281	4663	Wholesale of mining, construction and civil engineering machinery	0	0	0	0	0	0	0	0	0	0	0	0
282	4664	Wholesale of machinery for the textile industry and of sewing and knitting machines	0	0	0	0	0	0	0	0	0	0	0	0

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283	4665	Wholesale of office furniture	0	0	0	0	0	0	0	0	0	0	0	0
284	4666	Wholesale of other office machinery and equipment	0	0	0	0	0	0	0	0	0	0	0	0
285	4669	Wholesale of other machinery and equipment	0	0	0	0	0	0	0	0	0.34	0	0	0
286	4671	Wholesale of solid, liquid and gaseous fuels and related products	0	0	0	0	0	0	0	0	0.4	0	0	0
287	4672	Wholesale of metals and metal ores	0	0	0	0	0	0	0	0	37.88	0.19	0	0
288	4673	Wholesale of wood, construction materials and sanitary equipment	0	0	0	0	0	0	0	0	0.97	0	0	0
289	4674	Wholesale of hardware, plumbing and heating equipment and supplies	0	0	0	0	0	0	0	0	0	0	0	0
290	4675	Wholesale of chemical products	0	0	0	0	0	0	0	0	0	0	0	0
291	4676	Wholesale of other intermediate products	0	0	0	0	0	0	0	0	8.43	2.82	0	0
292	4690	Nonspecialised wholesale trade	0	0	0	0	0	0	0	0	0	0	0	0
293	4711	Retail sale in nonspecialised stores with food, beverages or tobacco predominating	0	0	0	0	0	0	0	0	44.92	0	0	0
294	4719	Other retail sale in nonspecialised stores	0	0	0	0	0	0	0	0	0.19	0.03	0	0
295	4721	Retail sale of fruit and vegetables in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0
296	4722	Retail sale of meat and meat products in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0
297	4723	Retail sale of fish, crustaceans and molluscs in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0
298	4724	Retail sale of bread, cakes, flour confectionery and sugar confectionery in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0
299	4726	Retail sale of tobacco products in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0
300	4729	Other retail sale of food in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0
301	4730	Retail sale of automotive fuel in specialised stores	0	0	0	0	0	0	0	0	20.07	0	0	0
302	4741	Retail sale of computers, peripheral units and software in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0
303	4742	Retail sale of telecommunications equipment in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0
304	4751	Retail sale of textiles in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0
305	4759	Retail sale of furniture, lighting equipment and other household articles in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0
306	4761	Retail sale of books in specialised stores	0	0	0	0	0	0	0	0	0.04	0	0	0
307	4762	Retail sale of newspapers and stationery in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0
308	4764	Retail sale of sporting equipment in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0
309	4765	Retail sale of games and toys in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0
310	4771	Retail sale of clothing in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0
311	4772	Retail sale of footwear and leather goods in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0
312	4774	Retail sale of medical and orthopaedic goods in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0
313	4775	Retail sale of cosmetic and toilet articles in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0
314	4777	Retail sale of watches and jewellery in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0
315	4781	Retail sale via stalls and markets of food, beverages and tobacco products	0	0	0	0	0	0	0	0	0	0	0	0
316	4782	Retail sale via stalls and markets of textiles, clothing and footwear	0	0	0	0	0	0	0	0	0	0	0	0
317	4791	Retail sale via mail order houses or via Internet	0	0	0	0	0	0	0	0	0.17	0.07	0	0
318	4799	Other retail sale not in stores, stalls or markets	0	0	0	0	0	0	0	0	0	0	0	0
319	4910	Passenger rail transport, interurban	0	0	0	0	0	0	0	0	549.13	475.69	0	0
320	4920	Freight rail transport	0	0	0	0	0	0	0	0	0	0	0	0
321	4931	Urban and suburban passenger land transport	0	0	0	0	0	0	0	0	175.82	152.82	0	0
322	4932	Taxi operation	0	0	0	0	0	0	0	0	0	0	0	0
323	4939	Other passenger land transport n.e.c.	0	0	0	0	0	0	0	0	0.39	0	0	0

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324	4941	Freight transport by road	0	0	0	0	0	0	0	0	2.99	0	0	0
325	4950	Transport via pipeline	0	0	0	0	0	0	0	0	0	0	0	0
326	5010	Sea and coastal passenger water transport	0	0	0	0	0	0	0	0	8.55	0	0	0
327	5020	Sea and coastal freight water transport	0	0	0	0	0	0	0	0	0	0	0	0
328	5040	Inland freight water transport	0	0	0	0	0	0	0	0	0	0	0	0
329	5110	Passenger air transport	0	0	0	0	0	0	0	0	0.94	0	0	0
330	5122	Space transport	0	0	0	0	0	0	0	0	0.09	0	0	0
331	5210	Warehousing and storage	0	0	0	0	0	0	0	0	0.09	0	0	0
332	5221	Service activities incidental to land transportation	0.03	0	0	0	0	0	0	0	52.17	9.23	0	0
333	5222	Service activities incidental to water transportation	0	0	0	0	0	0	0	0	0.01	0	0	0
334	5223	Service activities incidental to air transportation	0	0	0	0	0	0	0	0	129.24	98.35	0	0
335	5224	Cargo handling	0	0	0	0	0	0	0	0	0	0	0	0
336	5229	Other transportation support activities	0	0	0	0	0	0	0	0	0.01	0	0	0
337	5320	Other postal and courier activities	0	0	0	0	0	0	0	0	0	0	0	0
338	5510	Hotels and similar accommodation	0	0	0	0	69.93	0	0	0	266.65	0	0	0
339	5520	Holiday and other short-stay accommodation	0	0	0	0	0	0	0	0	0	0	0	0
340	5530	Camping grounds, recreational vehicle parks and trailer parks	0	0	0	0	0	0	0	0	0	0	0	0
341	5590	Other accommodation	0	0	0	0	0	0	0	0	0	0	0	0
342	5610	Restaurants and mobile food service activities	0	0	0	0	0	0	0	0	5.04	0	0	0
343	5621	Event catering activities	0	0	0	0	0	0	0	0	0	0	0	0
344	5629	Other food service activities	0	0	0	0	0	0	0	0	0	0	0	0
345	5630	Beverage serving activities	0	0	0	0	0	0	0	0	0	0	0	0
346	5811	Book publishing	0	0	0	0	0	0	0	0	0.15	0	0	0
347	5813	Publishing of newspapers	0	0	0	0	0	0	0	0	0	0	0	0
348	5819	Other publishing activities	0	0	0	0	0	0	0	0	0.2	0	0	0
349	5821	Publishing of computer games	0	0	0	0	0	0	0	0	0	0	0	0
350	5829	Other software publishing	0	0	0	0	0	0	0	0	0.05	0	0	0
351	5912	Motion picture, video and television programme postproduction activities	0	0	0	0	0	0	0	0	0.19	0	0	0
352	6010	Radio broadcasting	0	0	0	0	0	0	0	0	0	0	0	0
353	6020	Television programming and broadcasting activities	0	0	0	0	0	0	0	0	8.66	0.02	0	0
354	6110	Wired telecommunications activities	0	0	0	0	0	0	0	0	13.36	3.37	0	0
355	6120	Wireless telecommunications activities	0	0	0	0	0	0	0	0	0	0	0	0
356	6130	Satellite telecommunications activities	0	0	0	0	0	0	0	0	0.01	0	0	0
357	6190	Other telecommunications activities	0	0	0	0	0	0	0	0	8.93	3.99	0	0
358	6201	Computer programming activities	0	0	0	0	0	0	0	0	32.07	10.84	0	0
359	6202	Computer consultancy activities	0	0	0	0	0	0	0	0	2.81	0	0	0
360	6203	Computer facilities management activities	0	0	0	0	0	0	0	0	0.09	0	0	0
361	6209	Other information technology and computer service activities	0	0	0	0	0	0	0	0	0.04	0	0	0
362	6311	Data processing, hosting and related activities	0	0	0	0	0	0	0	0	0	0	0	0
363	6312	Web portals	0	0	0	0	0	0	0	0	0	0	0	0
364	6391	News agency activities	0	0	0	0	0	0	0	0	0	0	0	0
365	6399	Other information service activities n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0

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366	6419	Other monetary intermediation		0	0	0	0	0	0	0	0	0	0	0	0
367	6420	Activities of holding companies		0.02	0	0	0	7.26	0	0	0	222.53	45.45	0	0
368	6430	Trusts, funds and similar financial entities		0	0	0	0	0	0	0	0	0	0	0	0
369	6499	Other financial service activities, except insurance and pension funding n.e.c.		0.22	0	0	0	0.01	0	0	0	189.7	77.89	0	0
370	6619	Other activities auxiliary to financial services, except insurance and pension funding		0	0	0	0	0	0	0	0	384.87	377.78	0	0
371	6622	Activities of insurance agents and brokers		0	0	0	0	0	0	0	0	0.02	0	0	0
372	6810	Buying and selling of own real estate		0.03	0	0	0	0	0	0	0	7.87	0	0	0
373	6831	Real estate agencies		0	0	0	0	0	0	0	0	0.6	0.6	0	0
374	6832	Management of real estate on a fee or contract basis		0	0	0	0	0	0	0	0	0.56	0.23	0	0
375	6920	Accounting, bookkeeping and auditing activities; tax consultancy		0	0	0	0	0	0	0	0	27.24	0	0	0
376	7010	Activities of head offices		0	0	0	0	0	0	0	0	1.12	0.42	0	0
377	7021	Public relations and communication activities		0	0	0	0	0	0	0	0	0	0	0	0
378	7022	Business and other management consultancy activities		0	0	0	0	0	0	0	0	7.01	0.01	0	0
379	7111	Architectural activities		0	0	0	0	0	0	0	0	0	0	0	0
380	7112	Engineering activities and related technical consultancy		0.28	0.17	0	0	0	0	0	0	51.32	2.15	0	0
381	7120	Technical testing and analysis		2.98	2.87	0	0	0	0	0	0	2.98	2.87	0	0
382	7219	Other research and experimental development on natural sciences and engineering		0	0	0	0	0	0	0	0	0.1	0	0	0
383	7220	Research and experimental development on social sciences and humanities		0.09	0	0	0	0	0	0	0	0.09	0	0	0
384	7311	Advertising agencies		0	0	0	0	0	0	0	0	0.01	0	0	0
385	7410	Specialised design activities		0	0	0	0	0	0	0	0	0	0	0	0
386	7420	Photographic activities		0	0	0	0	0	0	0	0	0	0	0	0
387	7490	Other professional, scientific and technical activities n.e.c.		0.01	0	0	0	0	0	0	0	12.56	1.72	0	0
388	7500	Veterinary activities		0	0	0	0	0	0	0	0	0	0	0	0
389	7711	Renting and leasing of cars and light motor vehicles		0	0	0	0	0	0	0	0	15.11	0.4	0	0
390	7712	Renting and leasing of trucks		0	0	0	0	0	0	0	0	0.01	0	0	0
391	7732	Renting and leasing of construction and civil engineering machinery and equipment		0	0	0	0	0	0	0	0	2.06	0	0	0
392	7733	Renting and leasing of office machinery and equipment (including computers)		0	0	0	0	0	0	0	0	0	0	0	0
393	7734	Renting and leasing of water transport equipment		0	0	0	0	0	0	0	0	0	0	0	0
394	7735	Renting and leasing of air transport equipment		0	0	0	0	0	0	0	0	4.06	0.37	0	0
395	7739	Renting and leasing of other machinery, equipment and tangible goods n.e.c.		0	0	0	0	0	0	0	0	11.23	0.61	0	0
396	7740	Leasing of intellectual property and similar products, except copyrighted works		0	0	0	0	0	0	0	0	0	0	0	0
397	7810	Activities of employment placement agencies		0	0	0	0	0	0	0	0	0	0	0	0
398	7820	Temporary employment agency activities		0	0	0	0	0	0	0	0	0	0	0	0
399	7830	Other human resources provision		0	0	0	0	0	0	0	0	0	0	0	0
400	7911	Travel agency activities		0	0	0	0	0	0	0	0	0.02	0	0	0
401	7912	Tour operator activities		0	0	0	0	0	0	0	0	0	0	0	0
402	7990	Other reservation service and related activities		0	0	0	0	0	0	0	0	0	0	0	0
403	8010	Private security activities		0	0	0	0	0	0	0	0	0.37	0	0	0
404	8020	Security systems service activities		0	0	0	0	0	0	0	0	14.97	0.94	0	0
405	8110	Combined facilities support activities		0	0	0	0	0	0	0	0	0.11	0	0	0
406	8121	General cleaning of buildings		0	0	0	0	0	0	0	0	0.44	0.12	0	0
407	8122	Other building and industrial cleaning activities		0	0	0	0	0	0	0	0	2.35	0	0	0

					Pollution Prevention and Control (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
408	8129	Other cleaning activities	0.17	0.16	0	0	0	0	0	0	0	0	0.37	0.27	0	0
409	8130	Landscape service activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0
410	8211	Combined office administrative service activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0
411	8219	Photocopying, document preparation and other specialised office support activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0
412	8220	Activities of call centres	0	0	0	0	0	0	0	0	0	0	0	0	0	0
413	8230	Organisation of conventions and trade shows	0	0	0	0	0	0	0	0	0	0	0	0	0	0
414	8291	Activities of collection agencies and credit bureaus	0	0	0	0	0	0	0	0	0	0	0	0	0	0
415	8292	Packaging activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0
416	8299	Other business support service activities n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0	0	0
417	8412	Regulation of the activities of providing health care, education, cultural services and other social services, excluding social security	0	0	0	0	0	0	0	0	0	0	0	0	0	0
418	8424	Public order and safety activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0
419	8520	Primary education	0	0	0	0	0	0	0	0	0	0	0	0	0	0
420	8531	General secondary education	0	0	0	0	0	0	0	0	0	0	0	0	0	0
421	8532	Technical and vocational secondary education	0	0	0	0	0	0	0	0	0	0	0	0	0	0
422	8541	Post-secondary non-tertiary education	0	0	0	0	0	0	0	0	0	0	0	0	0	0
423	8552	Cultural education	0	0	0	0	0	0	0	0	0	0	0	0	0	0
424	8559	Other education n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0	0	0
425	8560	Educational support activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0
426	8610	Hospital activities	0	0	0	0	0	0	0	0	0	0	14.07	0	0	0
427	8621	General medical practice activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0
428	8622	Specialist medical practice activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0
429	8623	Dental practice activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0
430	8690	Other human health activities	0.01	0	0	0	0	0	0	0	0	0	0.01	0	0	0
431	8710	Residential nursing care activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0
432	8720	Residential care activities for mental retardation, mental health and substance abuse	0	0	0	0	0	0	0	0	0	0	0.39	0.06	0	0
433	8730	Residential care activities for the elderly and disabled	0	0	0	0	0	0	0	0	0	0	0.66	0.04	0	0
434	8790	Other residential care activities	0	0	0	0	0	0	0	0	0	0	4.7	0	0	0
435	8810	Social work activities without accommodation for the elderly and disabled	0	0	0	0	0	0	0	0	0	0	0	0	0	0
436	8891	Child daycare activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0
437	8899	Other social work activities without accommodation n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0	0	0
438	9001	Performing arts	0	0	0	0	0	0	0	0	0	0	0	0	0	0
439	9003	Artistic creation	0	0	0	0	0	0	0	0	0	0	0	0	0	0
440	9004	Operation of arts facilities	0	0	0	0	0	0	0	0	0	0	0	0	0	0
441	9200	Gambling and betting activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0
442	9311	Operation of sports facilities	0	0	0	0	0	0	0	0	0	0	0	0	0	0
443	9312	Activities of sport clubs	0	0	0	0	0	0	0	0	0	0	0	0	0	0
444	9313	Fitness facilities	0	0	0	0	0	0	0	0	0	0	0	0	0	0
445	9319	Other sports activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0
446	9321	Activities of amusement parks and theme parks	0	0	0	0	0	0	0	0	0	0	0	0	0	0
447	9329	Other amusement and recreation activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0
448	9499	Activities of other membership organisations n.e.c.	0	0	0	0	0	0.01	0	0	0	0	1.95	0	0	0

			Pollution Prevention and Control (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
449	9512	Repair of communication equipment	0	0	0	0	0	0	0	0	0	0	0	0
450	9521	Repair of consumer electronics	0	0	0	0	0	0	0	0	0	0	0	0
451	9601	Washing and (dry)cleaning of textile and fur products	0	0	0	0	0	0	0	0	0	0	0	0
452	9602	Hairdressing and other beauty treatment	0	0	0	0	0	0	0	0	0	0	0	0
453	9603	Funeral and related activities	0	0	0	0	0	0	0	0	1.93	0.14	0	0
454	9604	Physical wellbeing activities	0	0	0	0	0	0	0	0	0.01	0	0	0
455	9700	Activities of households as employers of domestic personnel	0	0	0	0	0	0	0	0	0	0	0	0
456	9820	Undifferentiated service-producing activities of private households for own use	0	0	0	0	0	0	0	0	0	0	0	0
457	9900	Activities of extraterritorial organisations and bodies	0	0	0	0	0	0	0	0	0	0	0	0
458	8810	Social work activities without accommodation for the elderly and disabled	0	0	0	0	0	0	0	0	0	0	0	0
459	8891	Child daycare activities	0	0	0	0	0	0	0	0	0	0	0	0
460	8899	Other social work activities without accommodation n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0
461	9001	Performing arts	0	0	0	0	0	0	0	0	0	0	0	0
462	9003	Artistic creation	0	0	0	0	0	0	0	0	0	0	0	0
463	9004	Operation of arts facilities	0	0	0	0	0	0	0	0	0	0	0	0
464	9200	Gambling and betting activities	0	0	0	0	0	0	0	0	0	0	0	0
465	9311	Operation of sports facilities	0	0	0	0	0	0	0	0	0	0	0	0
466	9312	Activities of sport clubs	0	0	0	0	0	0	0	0	0	0	0	0
467	9313	Fitness facilities	0	0	0	0	0	0	0	0	0	0	0	0
468	9319	Other sports activities	0	0	0	0	0	0	0	0	0	0	0	0
469	9321	Activities of amusement parks and theme parks	0	0	0	0	0	0	0	0	0	0	0	0
470	9329	Other amusement and recreation activities	0	0	0	0	0	0	0	0	0	0	0	0
471	9499	Activities of other membership organisations n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0
472	9512	Repair of communication equipment	0	0	0	0	0	0	0	0	0	0	0	0
473	9521	Repair of consumer electronics	0	0	0	0	0	0	0	0	0	0	0	0
474	9601	Washing and (dry)cleaning of textile and fur products	0	0	0	0	0	0	0	0	0	0	0	0
475	9602	Hairdressing and other beauty treatment	0	0	0	0	0	0	0	0	0	0	0	0
476	9603	Funeral and related activities	0	0	0	0	0	0	0	0	0	0	0	0
477	9604	Physical wellbeing activities	0	0	0	0	0	0	0	0	0	0	0	0
478	9609	Other personal service activities n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0
479	9700	Activities of households as employers of domestic personnel	0	0	0	0	0	0	0	0	0	0	0	0
480	9820	Undifferentiated service-producing activities of private households for own use	0	0	0	0	0	0	0	0	0	0	0	0
481	9900	Activities of extraterritorial organisations and bodies	0	0	0	0	0	0	0	0	0	0	0	0

Assets of non-financial corporations used to calculate the GAR in relation to CapEx KPIs, broken down by activity sector

			Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)				Circular Economy (CE)			
			Non-financial corporations (subject to NFRD disclosure obligations)		SMEs and other NFCs not subject to NFRD		Non-financial corporations (subject to NFRD disclosure obligations)		SMEs and other NFCs not subject to NFRD		Non-financial corporations (subject to NFRD disclosure obligations)		SMEs and other NFCs not subject to NFRD		Non-financial corporations (subject to NFRD disclosure obligations)		SMEs and other NFCs not subject to NFRD	
			Carrying amount [gross]		Carrying amount [gross]		Carrying amount [gross]		Carrying amount [gross]		Carrying amount [gross]		Carrying amount [gross]		Carrying amount [gross]		Carrying amount [gross]	
			Million EUR	Of which environmentally sustainable (CCM)	Million EUR	Of which environmentally sustainable (CCM)	Million EUR	Of which environmentally sustainable (CCA)	Million EUR	Of which environmentally sustainable (CCA)	Million EUR	Of which environmentally sustainable (WTR)	Million EUR	Of which environmentally sustainable (WTR)	Million EUR	Of which environmentally sustainable (CE)	Million EUR	Of which environmentally sustainable (CE)
Breakdown by sector - NACE 4 digits level (code and label)																		
1	111	Growing of cereals (except rice), leguminous crops and oil seeds	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2	113	Growing of vegetables and melons, roots and tubers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3	119	Growing of other nonperennial crops	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4	121	Growing of grapes	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5	122	Growing of tropical and subtropical fruits	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6	123	Growing of citrus fruits	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7	124	Growing of pome fruits and stone fruits	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8	125	Growing of other tree and bush fruits and nuts	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9	126	Growing of oleaginous fruits	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10	130	Plant propagation	4.04	0.06	0	0	0.03	0	0	0	0	0	0	0	1.74	0	0	0
11	142	Raising of other cattle and buffaloes	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12	143	Raising of horses and other equines	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
13	145	Raising of sheep and goats	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	146	Raising of swine/pigs	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	147	Raising of poultry	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
16	149	Raising of other animals	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17	150	Mixed farming	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
18	161	Support activities for crop production	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
19	162	Support activities for animal production	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
20	220	Logging	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
21	311	Marine fishing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
22	321	Marine aquaculture	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
23	322	Freshwater aquaculture	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
24	510	Mining of hard coal	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
25	610	Extraction of crude petroleum	15.57	12.36	0	0	0	0	0	0	0	0	0	0	0	0	0	0
26	891	Mining of chemical and fertiliser minerals	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
27	893	Extraction of salt	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
28	899	Other mining and quarrying n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
29	1011	Processing and preserving of meat	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
30	1012	Processing and preserving of poultry meat	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
31	1013	Production of meat and poultry meat products	0.34	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
32	1020	Processing and preserving of fish, crustaceans and molluscs	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
33	1032	Manufacture of fruit and vegetable juice	0.01	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

			Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)				Circular Economy (CE)			
34	1039	Other processing and preserving of fruit and vegetables	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
35	1041	Manufacture of oils and fats	0.01	0.01	0	0	0	0	0	0	0	0	0	0	0	0	0	0
36	1042	Manufacture of margarine and similar edible fats	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
37	1051	Operation of dairies and cheese making	0.03	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
38	1052	Manufacture of ice cream	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
39	1061	Manufacture of grain mill products	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
40	1071	Manufacture of bread; manufacture of fresh pastry goods and cakes	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
41	1072	Manufacture of rusks and biscuits; manufacture of preserved pastry goods and cakes	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
42	1073	Manufacture of macaroni, noodles, couscous and similar farinaceous products	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
43	1081	Manufacture of sugar	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
44	1082	Manufacture of cocoa, chocolate and sugar confectionery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
45	1084	Manufacture of condiments and seasonings	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
46	1085	Manufacture of prepared meals and dishes	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
47	1086	Manufacture of homogenised food preparations and dietetic food	0.26	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
48	1091	Manufacture of prepared feeds for farm animals	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
49	1092	Manufacture of prepared pet foods	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
50	1101	Distilling, rectifying and blending of spirits	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
51	1102	Manufacture of wine from grape	0.32	0.04	0	0	0	0	0	0	0	0	0	0	0	0	0	0
52	1105	Manufacture of beer	1.18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
53	1106	Manufacture of malt	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
54	1107	Manufacture of soft drinks; production of mineral waters and other bottled waters	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
55	1200	Manufacture of tobacco products	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
56	1310	Preparation and spinning of textile fibres	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
57	1320	Weaving of textiles	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
58	1330	Finishing of textiles	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
59	1391	Manufacture of knitted and crocheted fabrics	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
60	1392	Manufacture of madeup textile articles, except apparel	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
61	1395	Manufacture of non-wovens and articles made from non-wovens, except apparel	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
62	1396	Manufacture of other technical and industrial textiles	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
63	1399	Manufacture of other textiles n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
64	1412	Manufacture of workwear	0.01	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
65	1413	Manufacture of other outerwear	0.45	0.18	0	0	0	0	0	0	0	0	0	0	0	0	0	0
66	1419	Manufacture of other wearing apparel and accessories	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
67	1431	Manufacture of knitted and crocheted hosiery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
68	1439	Manufacture of other knitted and crocheted apparel	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
69	1511	Tanning and dressing of leather; dressing and dyeing of fur	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
70	1520	Manufacture of footwear	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
71	1610	Sawmilling and planing of wood	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
72	1621	Manufacture of veneer sheets and woodbased panels	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
73	1623	Manufacture of other builders' carpentry and joinery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

			Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)				Circular Economy (CE)			
74	1624	Manufacture of wooden containers	0.46	0.06	0	0	0	0	0	0	0	0	0	0	0	0	0	0
75	1629	Manufacture of other products of wood; manufacture of articles of cork, straw and plaiting materials	0.06	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
76	1711	Manufacture of pulp	16.45	16.14	0	0	0.02	0.02	0	0	0	0	0	0	10.8	0.09	0	0
77	1712	Manufacture of paper and paperboard	1.41	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
78	1721	Manufacture of corrugated paper and paperboard and of containers of paper and paperboard	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
79	1722	Manufacture of household and sanitary goods and of toilet requisites	0.01	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
80	1723	Manufacture of paper stationery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
81	1729	Manufacture of other articles of paper and paperboard	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
82	1811	Printing of newspapers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
83	1812	Other printing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
84	1920	Manufacture of refined petroleum products	9.91	4.71	0	0	0	0	0	0	0	0	0	0	0	0	0	0
85	2011	Manufacture of industrial gases	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
86	2012	Manufacture of dyes and pigments	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
87	2013	Manufacture of other inorganic basic chemicals	1.38	0.27	0	0	2.08	1.78	0	0	0	0	0	0	0.1	0	0	0
88	2014	Manufacture of other organic basic chemicals	2.94	0.27	0	0	0	0	0	0	0	0	0	0	0	0	0	0
89	2015	Manufacture of fertilisers and nitrogen compounds	2.5	1.95	0	0	0.01	0	0	0	0	0	0	0	0	0	0	0
90	2016	Manufacture of plastics in primary forms	0.05	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
91	2017	Manufacture of synthetic rubber in primary forms	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
92	2020	Manufacture of pesticides and other agrochemical products	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
93	2030	Manufacture of paints, varnishes and similar coatings, printing ink and mastics	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
94	2041	Manufacture of soap and detergents, cleaning and polishing preparations	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
95	2042	Manufacture of perfumes and toilet preparations	0.32	0	0	0	0	0	0	0	0	0	0	0	0.01	0	0	0
96	2051	Manufacture of explosives	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
97	2052	Manufacture of glues	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
98	2059	Manufacture of other chemical products n.e.c.	0.01	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
99	2060	Manufacture of manmade fibres	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
100	2110	Manufacture of basic pharmaceutical products	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
101	2120	Manufacture of pharmaceutical preparations	5.93	0	0	0	0	0	0	0	0.29	0	0	0	0	0	0	0
102	2211	Manufacture of rubber tyres and tubes; retreading and rebuilding of rubber tyres	4.29	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
103	2219	Manufacture of other rubber products	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
104	2221	Manufacture of plastic plates, sheets, tubes and profiles	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
105	2222	Manufacture of plastic packing goods	0.01	0	0	0	0	0	0	0	0	0	0	0	4.32	0	0	0
106	2223	Manufacture of builders' ware of plastic	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
107	2229	Manufacture of other plastic products	3.76	3.16	0	0	0	0	0	0	0	0	0	0	0.11	0	0	0
108	2311	Manufacture of flat glass	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
109	2313	Manufacture of hollow glass	3.29	2.85	0	0	0	0	0	0	0	0	0	0	0	0	0	0
110	2314	Manufacture of glass fibres	0.02	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
111	2320	Manufacture of refractory products	0.04	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
112	2331	Manufacture of ceramic tiles and flags	0.02	0	0	0	0	0	0	0	0	0	0	0	0.02	0	0	0
113	2332	Manufacture of bricks, tiles and construction products, in baked clay	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

			Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)				Circular Economy (CE)			
114	2342	Manufacture of ceramic sanitary fixtures	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
115	2344	Manufacture of other technical ceramic products	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
116	2349	Manufacture of other ceramic products	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
117	2351	Manufacture of cement	12.01	1.66	0	0	0	0	0	0	0	0	0	0	0.5	0	0	0
118	2352	Manufacture of lime and plaster	2.51	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
119	2364	Manufacture of mortars	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
120	2370	Cutting, shaping and finishing of stone	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
121	2399	Manufacture of other non-metallic mineral products n.e.c.	1.99	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
122	2410	Manufacture of basic iron and steel and of ferroalloys	32.31	8.88	0	0	0	0	0	0	0	0	0	0	0	0	0	0
123	2431	Cold drawing of bars	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
124	2432	Cold rolling of narrow strip	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
125	2433	Cold forming or folding	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
126	2434	Cold drawing of wire	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
127	2442	Aluminium production	13.37	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
128	2443	Lead, zinc and tin production	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
129	2444	Copper production	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
130	2445	Other nonferrous metal production	268.05	255.32	0	0	0	0	0	0	0	0	0	0	0	0	0	0
131	2446	Processing of nuclear fuel	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
132	2451	Casting of iron	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
133	2452	Casting of steel	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
134	2453	Casting of light metals	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
135	2454	Casting of other nonferrous metals	0.09	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
136	2511	Manufacture of metal structures and parts of structures	0.75	0	0	0	0	0	0	0	0	0	0	0	0.03	0	0	0
137	2512	Manufacture of doors and windows of metal	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
138	2521	Manufacture of central heating radiators and boilers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
139	2529	Manufacture of other tanks, reservoirs and containers of metal	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
140	2540	Manufacture of weapons and ammunition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
141	2550	Forging, pressing, stamping and rollforming of metal; powder metallurgy	20.32	5.39	0	0	0	0	0	0	0	0	0	0	0.01	0	0	0
142	2561	Treatment and coating of metals	2.98	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
143	2562	Machining	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
144	2571	Manufacture of cutlery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
145	2572	Manufacture of locks and hinges	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
146	2573	Manufacture of tools	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
147	2592	Manufacture of light metal packaging	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
148	2593	Manufacture of wire products, chain and springs	1.29	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
149	2594	Manufacture of fasteners and screw machine products	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
150	2599	Manufacture of other fabricated metal products n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
151	2611	Manufacture of electronic components	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
152	2612	Manufacture of loaded electronic boards	0.32	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
153	2620	Repair of computers and peripheral equipment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
154	2630	Manufacture of communication equipment	0.04	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

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155	2651	Manufacture of instruments and appliances for measuring, testing and navigation	0.1	0	0	0	0.01	0	0	0	0	0	0	0	0	0	0	0
156	2652	Manufacture of watches and clocks	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
157	2660	Manufacture of irradiation, electromedical and electrotherapeutic equipment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
158	2670	Manufacture of optical instruments and photographic equipment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
159	2711	Manufacture of electric motors, generators and transformers	16.1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
160	2720	Manufacture of batteries and accumulators	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
161	2731	Manufacture of fibre optic cables	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
162	2733	Manufacture of wiring devices	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
163	2740	Manufacture of electric lighting equipment	0.01	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
164	2751	Manufacture of electric domestic appliances	0.01	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
165	2790	Manufacture of other electrical equipment	9.5	2.47	0	0	0	0	0	0	0	0	0	0	0.09	0	0	0
166	2811	Manufacture of engines and turbines, except aircraft, vehicle and cycle engines	0.15	0	0	0	0	0	0	0	0	0	0	0	0.01	0	0	0
167	2812	Manufacture of fluid power equipment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
168	2813	Manufacture of other pumps and compressors	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
169	2814	Manufacture of other taps and valves	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
170	2815	Manufacture of bearings, gears, gearing and driving elements	1.81	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
171	2821	Manufacture of ovens, furnaces and furnace burners	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
172	2822	Manufacture of lifting and handling equipment	10.07	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
173	2825	Manufacture of nondomestic cooling and ventilation equipment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
174	2829	Manufacture of other general purpose machinery n.e.c.	0.89	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
175	2830	Manufacture of agricultural and forestry machinery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
176	2841	Manufacture of metal forming machinery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
177	2849	Manufacture of other machine tools	0.15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
178	2891	Manufacture of machinery for metallurgy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
179	2892	Manufacture of machinery for mining, quarrying and construction	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
180	2893	Manufacture of machinery for food, beverage and tobacco processing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
181	2894	Manufacture of machinery for textile, apparel and leather production	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
182	2895	Manufacture of machinery for paper and paperboard production	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
183	2896	Manufacture of plastics and rubber machinery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
184	2899	Manufacture of other special purpose machinery n.e.c.	0.04	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
185	2910	Manufacture of motor vehicles	80.06	10.48	0	0	0	0	0	0	0	0	0	0	0	0	0	0
186	2920	Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semitrailers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
187	2931	Manufacture of electrical and electronic equipment for motor vehicles	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
188	2932	Manufacture of other parts and accessories for motor vehicles	125.75	57.98	0	0	0	0	0	0	0	0	0	0	0	0	0	0
189	3011	Building of ships and floating structures	7.92	4.56	0	0	0	0	0	0	0	0	0	0	0	0	0	0
190	3020	Manufacture of railway locomotives and rolling stock	19.7	16.29	0	0	0	0	0	0	0	0	0	0	0.01	0	0	0
191	3030	Manufacture of air and spacecraft and related machinery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
192	3040	Manufacture of military fighting vehicles	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
193	3092	Manufacture of bicycles and invalid carriages	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
194	3099	Manufacture of other transport equipment n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

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195	3101	Manufacture of office and shop furniture	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
196	3102	Manufacture of kitchen furniture	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
197	3103	Manufacture of mattresses	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
198	3109	Manufacture of other furniture	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
199	3213	Manufacture of imitation jewellery and related articles	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
200	3230	Manufacture of sports goods	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
201	3240	Manufacture of games and toys	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
202	3250	Manufacture of medical and dental instruments and supplies	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
203	3291	Manufacture of brooms and brushes	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
204	3299	Other manufacturing n.e.c.	2.5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
205	3312	Repair of machinery	0.08	0	0	0	0	0	0	0	0	0	0	0	0.09	0	0	0
206	3314	Repair of electrical equipment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
207	3317	Repair and maintenance of other transport equipment	0.2	0.03	0	0	0	0	0	0	0	0	0	0	0	0	0	0
208	3320	Installation of industrial machinery and equipment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
209	3511	Production of electricity	1046.37	386.71	0	0	0.34	0.26	0	0	0.01	0.01	0	0	0.51	0.4	0	0
210	3512	Transmission of electricity	11.6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
211	3513	Distribution of electricity	269.96	175.75	0	0	0	0	0	0	0	0	0	0	0	0	0	0
212	3514	Trade of electricity	118.05	0.24	0	0	0.06	0	0	0	0	0	0	0	0	0	0	0
213	3521	Manufacture of gas	30.83	28.19	0	0	0	0	0	0	0	0	0	0	0	0	0	0
214	3522	Distribution of gaseous fuels through mains	264.38	241.39	0	0	0	0	0	0	0	0	0	0	0	0	0	0
215	3523	Trade of gas through mains	134.86	123.97	0	0	1.36	0	0	0	0	0	0	0	0	0	0	0
216	3600	Water collection, treatment and supply	184.28	153.98	0	0	0.03	0	0	0	0.95	0.94	0	0	0.26	0.17	0	0
217	3811	Collection of non-hazardous waste	10.7	0.28	0	0	0.04	0	0	0	0.02	0.01	0	0	0.11	0	0	0
218	3821	Treatment and disposal of non-hazardous waste	1.57	0	0	0	0	0	0	0	0	0	0	0	0.01	0	0	0
219	3822	Treatment and disposal of hazardous waste	0.04	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
220	3831	Dismantling of wrecks	2.28	0	0	0	0	0	0	0	0	0	0	0	1.97	0	0	0
221	3832	Recovery of sorted materials	16.68	15.23	0	0	0	0	0	0	0	0	0	0	0	0	0	0
222	3900	Remediation activities and other waste management services	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
223	4110	Development of building projects	77.26	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
224	4120	Construction of residential and non-residential buildings	6.78	0	0	0	4.9	0	0	0	0.05	0	0	0	0.01	0	0	0
225	4211	Construction of roads and motorways	13.44	1.38	0	0	0.04	0	0	0	0.72	0	0	0	0.1	0	0	0
226	4212	Construction of railways and underground railways	342.24	213.37	0	0	0	0	0	0	0	0	0	0	0.34	0	0	0
227	4213	Construction of bridges and tunnels	10.68	0	0	0	0.15	0	0	0	0.04	0	0	0	0.03	0	0	0
228	4221	Construction of utility projects for fluids	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
229	4222	Construction of utility projects for electricity and telecommunications	19.34	6.96	0	0	0.01	0.01	0	0	0.03	0	0	0	0.07	0.01	0	0
230	4291	Construction of water projects	0.05	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
231	4299	Construction of other civil engineering projects n.e.c.	67.88	4.33	0	0	0	0	0	0	0.03	0	0	0	0.03	0	0	0
232	4311	Demolition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
233	4312	Site preparation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
234	4322	Plumbing, heat and airconditioning installation	0.06	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
235	4329	Other construction installation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
236	4333	Floor and wall covering	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

			Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)				Circular Economy (CE)			
237	4334	Painting and glazing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
238	4339	Other building completion and finishing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
239	4391	Roofing activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
240	4399	Other specialised construction activities n.e.c.	34.3	0.52	0	0	0.8	0.03	0	0	0.68	0	0	0	0.19	0	0	0
241	4511	Sale of cars and light motor vehicles	13.85	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
242	4520	Maintenance and repair of motor vehicles	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
243	4531	Wholesale trade of motor vehicle parts and accessories	2.07	0	0	0	0	0	0	0	0	0	0	0	0.03	0	0	0
244	4532	Retail trade of motor vehicle parts and accessories	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
245	4612	Agents involved in the sale of fuels, ores, metals and industrial chemicals	11.93	0.08	0	0	0	0	0	0	0	0	0	0	0.04	0	0	0
246	4613	Agents involved in the sale of timber and building materials	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
247	4615	Agents involved in the sale of furniture, household goods, hardware and ironmongery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
248	4616	Agents involved in the sale of textiles, clothing, fur, footwear and leather goods	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
249	4617	Agents involved in the sale of food, beverages and tobacco	0.29	0	0	0	0	0	0	0	0	0	0	0	0.02	0	0	0
250	4618	Agents specialised in the sale of other particular products	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
251	4619	Agents involved in the sale of a variety of goods	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
252	4621	Wholesale of grain, unmanufactured tobacco, seeds and animal feeds	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
253	4622	Wholesale of flowers and plants	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
254	4623	Wholesale of live animals	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
255	4624	Wholesale of hides, skins and leather	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
256	4631	Wholesale of fruit and vegetables	0.84	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
257	4632	Wholesale of meat and meat products	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
258	4633	Wholesale of dairy products, eggs and edible oils and fats	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
259	4634	Wholesale of beverages	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
260	4635	Wholesale of tobacco products	0.03	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
261	4636	Wholesale of sugar and chocolate and sugar confectionery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
262	4637	Wholesale of coffee, tea, cocoa and spices	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
263	4638	Wholesale of other food, including fish, crustaceans and molluscs	2.81	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
264	4639	Nonspecialised wholesale of food, beverages and tobacco	0.62	0	0	0	0	0	0	0	0	0	0	0	0.01	0	0	0
265	4641	Wholesale of textiles	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
266	4642	Wholesale of clothing and footwear	0.58	0	0	0	0	0	0	0	0	0	0	0	0.01	0	0	0
267	4644	Wholesale of china and glassware and cleaning materials	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
268	4645	Wholesale of perfume and cosmetics	1.73	0	0	0	0	0	0	0	0	0	0	0	0.43	0	0	0
269	4646	Wholesale of pharmaceutical goods	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
270	4647	Wholesale of furniture, carpets and lighting equipment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
271	4648	Wholesale of watches and jewellery	0.15	0	0	0	0.02	0	0	0	0	0	0	0	0	0	0	0
272	4649	Wholesale of other household goods	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
273	4651	Wholesale of computers, computer peripheral equipment and software	2.15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
274	4652	Wholesale of electronic and telecommunications equipment and parts	0.01	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
275	4661	Wholesale of agricultural machinery, equipment and supplies	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
276	4662	Wholesale of machine tools	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
277	4663	Wholesale of mining, construction and civil engineering machinery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

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278	4664	Wholesale of machinery for the textile industry and of sewing and knitting machines	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
279	4665	Wholesale of office furniture	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
280	4666	Wholesale of other office machinery and equipment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
281	4669	Wholesale of other machinery and equipment	0.24	0	0	0	0	0	0	0	0	0	0	0	0.17	0	0	0
282	4671	Wholesale of solid, liquid and gaseous fuels and related products	2.01	0.02	0	0	0.03	0	0	0	0	0	0	0	0	0	0	0
283	4672	Wholesale of metals and metal ores	30.94	1.83	0	0	0	0	0	0	0	0	0	0	0	0	0	0
284	4673	Wholesale of wood, construction materials and sanitary equipment	0.99	0	0	0	0	0	0	0	0	0	0	0	0.01	0	0	0
285	4674	Wholesale of hardware, plumbing and heating equipment and supplies	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
286	4675	Wholesale of chemical products	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
287	4676	Wholesale of other intermediate products	13.83	9.21	0	0	0	0	0	0	0	0	0	0	4.58	0	0	0
288	4677	Wholesale of waste and scrap	0.03	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
289	4690	Nonspecialised wholesale trade	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
290	4711	Retail sale in nonspecialised stores with food, beverages or tobacco predominating	176.61	22.54	0	0	1.54	0.11	0	0	0.34	0.03	0	0	2.78	0.14	0	0
291	4719	Other retail sale in nonspecialised stores	11.35	0.93	0	0	0	0	0	0	0.01	0	0	0	0	0	0	0
292	4721	Retail sale of fruit and vegetables in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
293	4722	Retail sale of meat and meat products in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
294	4723	Retail sale of fish, crustaceans and molluscs in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
295	4724	Retail sale of bread, cakes, flour confectionery and sugar confectionery in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
296	4726	Retail sale of tobacco products in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
297	4729	Other retail sale of food in specialised stores	0.05	0	0	0	0.27	0	0	0	0	0	0	0	0	0	0	0
298	4730	Retail sale of automotive fuel in specialised stores	20.38	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
299	4741	Retail sale of computers, peripheral units and software in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
300	4742	Retail sale of telecommunications equipment in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
301	4751	Retail sale of textiles in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
302	4752	Retail sale of hardware, paints and glass in specialised stores	6.2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
303	4759	Retail sale of furniture, lighting equipment and other household articles in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
304	4761	Retail sale of books in specialised stores	0	0	0	0	0.3	0	0	0	0	0	0	0	0	0	0	0
305	4762	Retail sale of newspapers and stationery in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
306	4764	Retail sale of sporting equipment in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
307	4765	Retail sale of games and toys in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
308	4771	Retail sale of clothing in specialised stores	3.46	1.01	0	0	0	0	0	0	0	0	0	0	0	0	0	0
309	4772	Retail sale of footwear and leather goods in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
310	4774	Retail sale of medical and orthopaedic goods in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
311	4775	Retail sale of cosmetic and toilet articles in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
312	4777	Retail sale of watches and jewellery in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
313	4778	Other retail sale of new goods in specialised stores	0.32	0	0	0	0.01	0	0	0	0	0	0	0	0.01	0	0	0
314	4781	Retail sale via stalls and markets of food, beverages and tobacco products	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
315	4782	Retail sale via stalls and markets of textiles, clothing and footwear	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

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316	4791	Retail sale via mail order houses or via Internet	0.17	0.07	0	0	0	0	0	0	0	0	0	0	0	0	0	0
317	4799	Other retail sale not in stores, stalls or markets	0.02	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
318	4910	Passenger rail transport, interurban	553.71	477.09	0	0	0	0	0	0	0	0	0	0	0	0	0	0
319	4920	Freight rail transport	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
320	4931	Urban and suburban passenger land transport	178.9	155.7	0	0	0	0	0	0	0	0	0	0	0	0	0	0
321	4932	Taxi operation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
322	4939	Other passenger land transport n.e.c.	0.39	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
323	4941	Freight transport by road	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
324	4950	Transport via pipeline	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
325	5010	Sea and coastal passenger water transport	8.55	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
326	5020	Sea and coastal freight water transport	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
327	5040	Inland freight water transport	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
328	5110	Passenger air transport	0.77	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
329	5122	Space transport	0.08	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
330	5210	Warehousing and storage	0.07	0	0	0	0	0	0	0	0	0	0	0	0.01	0	0	0
331	5221	Service activities incidental to land transportation	23.52	3.66	0	0	0.01	0	0	0	0.12	0	0	0	23.75	0	0	0
332	5222	Service activities incidental to water transportation	0.01	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
333	5223	Service activities incidental to air transportation	69.86	61.61	0	0	0	0	0	0	0.69	0.69	0	0	19.41	0.02	0	0
334	5224	Cargo handling	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
335	5229	Other transportation support activities	0.06	0	0	0	0	0	0	0	0	0	0	0	0.01	0	0	0
336	5320	Other postal and courier activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
337	5510	Hotels and similar accommodation	200.33	0.83	0	0	0	0	0	0	0	0	0	0	0	0	0	0
338	5520	Holiday and other short-stay accommodation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
339	5530	Camping grounds, recreational vehicle parks and trailer parks	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
340	5590	Other accommodation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
341	5610	Restaurants and mobile food service activities	1.51	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
342	5621	Event catering activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
343	5629	Other food service activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
344	5630	Beverage serving activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
345	5811	Book publishing	0.01	0	0	0	1.07	0	0	0	0	0	0	0	0	0	0	0
346	5813	Publishing of newspapers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
347	5819	Other publishing activities	0.08	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
348	5821	Publishing of computer games	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
349	5829	Other software publishing	0.03	0	0	0	0	0	0	0	0	0	0	0	0.02	0	0	0
350	5912	Motion picture, video and television programme postproduction activities	0.05	0	0	0	0	0	0	0	0	0	0	0	0.24	0	0	0
351	6010	Radio broadcasting	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
352	6020	Television programming and broadcasting activities	0.75	0.09	0	0	64.02	0.34	0	0	0	0	0	0	0	0	0	0
353	6110	Wired telecommunications activities	5.21	0.4	0	0	0.56	0	0	0	0	0	0	0	18.48	7.03	0	0
354	6120	Wireless telecommunications activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
355	6130	Satellite telecommunications activities	0	0	0	0	0	0	0	0	0	0	0	0	0.02	0	0	0
356	6201	Computer programming activities	19.26	18.16	0	0	0.09	0.02	0	0	0	0	0	0	12.4	0	0	0
357	6202	Computer consultancy activities	0.15	0	0	0	0	0	0	0	0	0	0	0	0.58	0	0	0

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358	6203	Computer facilities management activities	0.09	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
359	6209	Other information technology and computer service activities	0.02	0	0	0	0	0	0	0	0	0	0	0	0.06	0	0	0
360	6311	Data processing, hosting and related activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
361	6312	Web portals	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
362	6391	News agency activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
363	6399	Other information service activities n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
364	6419	Other monetary intermediation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
365	6420	Activities of holding companies	744.59	637.6	0	0	9.27	1.11	0	0	0.34	0.02	0	0	19.41	5.82	0	0
366	6430	Trusts, funds and similar financial entities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
367	6619	Other activities auxiliary to financial services, except insurance and pension funding	420.46	419.31	0	0	0	0	0	0	0	0	0	0	0	0	0	0
368	6622	Activities of insurance agents and brokers	0	0	0	0	0.02	0	0	0	0	0	0	0	0	0	0	0
369	6810	Buying and selling of own real estate	7.84	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
370	6820	Renting and operating of own or leased real estate	109.1	4.74	0	0	1.12	0.02	0	0	0.04	0	0	0	0.24	0.02	0	0
371	6831	Real estate agencies	0.61	0.61	0	0	0	0	0	0	0	0	0	0	0	0	0	0
372	6920	Accounting, bookkeeping and auditing activities; tax consultancy	28.26	0.11	0	0	0.2	0.06	0	0	0	0	0	0	0	0	0	0
373	7010	Activities of head offices	31.21	3.86	0	0	0	0	0	0	0	0	0	0	0	0	0	0
374	7021	Public relations and communication activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
375	7022	Business and other management consultancy activities	7.74	0.91	0	0	8.23	0.55	0	0	0	0	0	0	0	0	0	0
376	7111	Architectural activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
377	7112	Engineering activities and related technical consultancy	53.15	1.67	0	0	0.3	0	0	0	0.13	0.12	0	0	0.25	0.07	0	0
378	7120	Technical testing and analysis	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
379	7219	Other research and experimental development on natural sciences and engineering	0.11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
380	7220	Research and experimental development on social sciences and humanities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
381	7311	Advertising agencies	0.01	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
382	7410	Specialised design activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
383	7420	Photographic activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
384	7490	Other professional, scientific and technical activities n.e.c.	1	0.41	0	0	13.05	0.07	0	0	0	0	0	0	0	0	0	0
385	7500	Veterinary activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
386	7711	Renting and leasing of cars and light motor vehicles	15.03	0.7	0	0	0	0	0	0	0	0	0	0	0.01	0	0	0
387	7712	Renting and leasing of trucks	0.01	0	0	0	0	0	0	0	0	0	0	0	0.02	0	0	0
388	7732	Renting and leasing of construction and civil engineering machinery and equipment	2.17	0	0	0	0	0	0	0	0	0	0	0	2.4	0	0	0
389	7733	Renting and leasing of office machinery and equipment (including computers)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
390	7734	Renting and leasing of water transport equipment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
391	7735	Renting and leasing of air transport equipment	4.09	0.4	0	0	0	0	0	0	0	0	0	0	0	0	0	0
392	7739	Renting and leasing of other machinery, equipment and tangible goods n.e.c.	12.46	0.3	0	0	0.53	0.17	0	0	0	0	0	0	0.01	0	0	0
393	7740	Leasing of intellectual property and similar products, except copyrighted works	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
394	7810	Activities of employment placement agencies	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
395	7830	Other human resources provision	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

			Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)				Circular Economy (CE)			
396	7911	Travel agency activities	0.34	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
397	7912	Tour operator activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
398	7990	Other reservation service and related activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
399	8010	Private security activities	0.35	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
400	8020	Security systems service activities	3.12	0.59	0	0	0.01	0	0	0	0.01	0.01	0	0	0.26	0.02	0	0
401	8110	Combined facilities support activities	0.07	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
402	8121	General cleaning of buildings	0.11	0.08	0	0	0	0	0	0	0	0	0	0	0	0	0	0
403	8122	Other building and industrial cleaning activities	2.4	0	0	0	0.03	0	0	0	0	0	0	0	0.01	0	0	0
404	8130	Landscape service activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
405	8211	Combined office administrative service activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
406	8219	Photocopying, document preparation and other specialised office support activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
407	8220	Activities of call centres	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
408	8230	Organisation of conventions and trade shows	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
409	8291	Activities of collection agencies and credit bureaus	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
410	8292	Packaging activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
411	8299	Other business support service activities n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
412	8412	Regulation of the activities of providing health care, education, cultural services and other social services, excluding social security	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
413	8424	Public order and safety activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
414	8520	Primary education	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
415	8531	General secondary education	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
416	8532	Technical and vocational secondary education	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
417	8541	Post-secondary non-tertiary education	0	0	0	0	0.01	0	0	0	0	0	0	0	0	0	0	0
418	8552	Cultural education	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
419	8559	Other education n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
420	8560	Educational support activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
421	8610	Hospital activities	14.08	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
422	8621	General medical practice activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
423	8622	Specialist medical practice activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
424	8623	Dental practice activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
425	8690	Other human health activities	0.01	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
426	8710	Residential nursing care activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
427	8720	Residential care activities for mental retardation, mental health and substance abuse	0.02	0.01	0	0	0	0	0	0	0	0	0	0	0	0	0	0
428	8730	Residential care activities for the elderly and disabled	1.54	0	0	0	1.79	0.04	0	0	0	0	0	0	0	0	0	0
429	8790	Other residential care activities	0	0	0	0	4.7	0	0	0	0	0	0	0	0	0	0	0
430	8810	Social work activities without accommodation for the elderly and disabled	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
431	8891	Child daycare activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
432	8899	Other social work activities without accommodation n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
433	9001	Performing arts	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
434	9003	Artistic creation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
435	9004	Operation of arts facilities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

			Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)				Circular Economy (CE)			
436	9200	Gambling and betting activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
437	9311	Operation of sports facilities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
438	9312	Activities of sport clubs	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
439	9313	Fitness facilities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
440	9319	Other sports activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
441	9321	Activities of amusement parks and theme parks	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
442	9329	Other amusement and recreation activities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
443	9499	Activities of other membership organisations n.e.c.	1.65	0	0	0	0.01	0	0	0	0.01	0	0	0	0	0	0	0
444	9512	Repair of communication equipment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
445	9521	Repair of consumer electronics	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
446	9601	Washing and (dry)cleaning of textile and fur products	4.75	3.17	0	0	0.16	0.13	0	0	0	0	0	0	0	0	0	0
447	9602	Hairdressing and other beauty treatment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
448	9603	Funeral and related activities	0.97	0	0	0	0.95	0.14	0	0	0	0	0	0	0	0	0	0
449	9604	Physical wellbeing activities	0.01	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
450	9700	Activities of households as employers of domestic personnel	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
451	9820	Undifferentiated service-producing activities of private households for own use	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
452	9900	Activities of extraterritorial organisations and bodies	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0



Breakdown by sector - NACE 4 digits level (code and label)			Pollution Prevention and Control (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
			Non-financial corporations (subject to NFRD disclosure obligations)		SMEs and other NFCs not subject to NFRD		Non-financial corporations (subject to NFRD disclosure obligations)		SMEs and other NFCs not subject to NFRD		Non-financial corporations (subject to NFRD disclosure obligations)		SMEs and other NFCs not subject to NFRD	
			Carrying amount [gross]		Carrying amount [gross]		Carrying amount [gross]		Carrying amount [gross]		Carrying amount [gross]		Carrying amount [gross]	
			Million EUR	Of which environmentally sustainable (PPC)	Million EUR	Of which environmentally sustainable (PPC)	Million EUR	Of which environmentally sustainable (BIO)	Million EUR	Of which environmentally sustainable (BIO)	Million EUR	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Million EUR	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
1	111	Growing of cereals (except rice), leguminous crops and oil seeds	0	0	0	0	0	0	0	0	0	0	0	0
2	113	Growing of vegetables and melons, roots and tubers	0	0	0	0	0	0	0	0	0	0	0	0
3	119	Growing of other nonperennial crops	0	0	0	0	0	0	0	0	0	0	0	0
4	121	Growing of grapes	0	0	0	0	0	0	0	0	0	0	0	0
5	122	Growing of tropical and subtropical fruits	0	0	0	0	0	0	0	0	0	0	0	0
6	123	Growing of citrus fruits	0	0	0	0	0	0	0	0	0	0	0	0
7	124	Growing of pome fruits and stone fruits	0	0	0	0	0	0	0	0	0	0	0	0
8	125	Growing of other tree and bush fruits and nuts	0	0	0	0	0	0	0	0	0	0	0	0
9	126	Growing of oleaginous fruits	0	0	0	0	0	0	0	0	0	0	0	0
10	130	Plant propagation	0	0	0	0	0	0	0	0	5.81	0.06	0	0
11	142	Raising of other cattle and buffaloes	0	0	0	0	0	0	0	0	0	0	0	0
12	143	Raising of horses and other equines	0	0	0	0	0	0	0	0	0	0	0	0
13	145	Raising of sheep and goats	0	0	0	0	0	0	0	0	0	0	0	0
14	146	Raising of swine/pigs	0	0	0	0	0	0	0	0	0	0	0	0
15	147	Raising of poultry	0	0	0	0	0	0	0	0	0	0	0	0
16	149	Raising of other animals	0	0	0	0	0	0	0	0	0	0	0	0
17	150	Mixed farming	0	0	0	0	0	0	0	0	0	0	0	0
18	161	Support activities for crop production	0	0	0	0	0	0	0	0	0	0	0	0
19	162	Support activities for animal production	0	0	0	0	0	0	0	0	0	0	0	0
20	220	Logging	0	0	0	0	0	0	0	0	0	0	0	0
21	311	Marine fishing	0	0	0	0	0	0	0	0	0	0	0	0
22	321	Marine aquaculture	0	0	0	0	0	0	0	0	0	0	0	0
23	322	Freshwater aquaculture	0	0	0	0	0	0	0	0	0	0	0	0
24	510	Mining of hard coal	0	0	0	0	0	0	0	0	0	0	0	0
25	610	Extraction of crude petroleum	0	0	0	0	0	0	0	0	15.57	12.36	0	0
26	891	Mining of chemical and fertiliser minerals	0	0	0	0	0	0	0	0	0	0	0	0
27	893	Extraction of salt	0	0	0	0	0	0	0	0	0	0	0	0
28	899	Other mining and quarrying n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0
29	1011	Processing and preserving of meat	0	0	0	0	0	0	0	0	0	0	0	0
30	1012	Processing and preserving of poultry meat	0	0	0	0	0	0	0	0	0	0	0	0
31	1013	Production of meat and poultry meat products	0	0	0	0	0	0	0	0	0.34	0	0	0
32	1020	Processing and preserving of fish, crustaceans and molluscs	0	0	0	0	0	0	0	0	0	0	0	0
33	1032	Manufacture of fruit and vegetable juice	0	0	0	0	0	0	0	0	0.01	0	0	0
34	1039	Other processing and preserving of fruit and vegetables	0	0	0	0	0	0	0	0	0	0	0	0

			Pollution Prevention and Control (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
35	1041	Manufacture of oils and fats	0	0	0	0	0	0	0	0	0.01	0.01	0	0
36	1042	Manufacture of margarine and similar edible fats	0	0	0	0	0	0	0	0	0	0	0	0
37	1051	Operation of dairies and cheese making	0	0	0	0	0	0	0	0	0.03	0	0	0
38	1052	Manufacture of ice cream	0	0	0	0	0	0	0	0	0	0	0	0
39	1061	Manufacture of grain mill products	0	0	0	0	0	0	0	0	0	0	0	0
40	1071	Manufacture of bread; manufacture of fresh pastry goods and cakes	0	0	0	0	0	0	0	0	0	0	0	0
41	1072	Manufacture of rusks and biscuits; manufacture of preserved pastry goods and cakes	0	0	0	0	0	0	0	0	0	0	0	0
42	1073	Manufacture of macaroni, noodles, couscous and similar farinaceous products	0	0	0	0	0	0	0	0	0	0	0	0
43	1081	Manufacture of sugar	0	0	0	0	0	0	0	0	0	0	0	0
44	1082	Manufacture of cocoa, chocolate and sugar confectionery	0	0	0	0	0	0	0	0	0	0	0	0
45	1084	Manufacture of condiments and seasonings	0	0	0	0	0	0	0	0	0	0	0	0
46	1085	Manufacture of prepared meals and dishes	0	0	0	0	0	0	0	0	0	0	0	0
47	1086	Manufacture of homogenised food preparations and dietetic food	0	0	0	0	0	0	0	0	0.26	0	0	0
48	1091	Manufacture of prepared feeds for farm animals	0	0	0	0	0	0	0	0	0	0	0	0
49	1092	Manufacture of prepared pet foods	0	0	0	0	0	0	0	0	0	0	0	0
50	1101	Distilling, rectifying and blending of spirits	0	0	0	0	0	0	0	0	0	0	0	0
51	1102	Manufacture of wine from grape	0	0	0	0	0	0	0	0	0.32	0.04	0	0
52	1105	Manufacture of beer	0	0	0	0	0	0	0	0	1.18	0	0	0
53	1106	Manufacture of malt	0	0	0	0	0	0	0	0	0	0	0	0
54	1107	Manufacture of soft drinks; production of mineral waters and other bottled waters	0	0	0	0	0	0	0	0	0	0	0	0
55	1200	Manufacture of tobacco products	0	0	0	0	0	0	0	0	0	0	0	0
56	1310	Preparation and spinning of textile fibres	0	0	0	0	0	0	0	0	0	0	0	0
57	1320	Weaving of textiles	0	0	0	0	0	0	0	0	0	0	0	0
58	1330	Finishing of textiles	0	0	0	0	0	0	0	0	0	0	0	0
59	1391	Manufacture of knitted and crocheted fabrics	0	0	0	0	0	0	0	0	0	0	0	0
60	1392	Manufacture of madeup textile articles, except apparel	0	0	0	0	0	0	0	0	0	0	0	0
61	1395	Manufacture of non-wovens and articles made from non-wovens, except apparel	0	0	0	0	0	0	0	0	0	0	0	0
62	1396	Manufacture of other technical and industrial textiles	0	0	0	0	0	0	0	0	0	0	0	0
63	1399	Manufacture of other textiles n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0
64	1412	Manufacture of workwear	0	0	0	0	0	0	0	0	0.01	0	0	0
65	1413	Manufacture of other outerwear	0	0	0	0	0	0	0	0	0.45	0.18	0	0
66	1419	Manufacture of other wearing apparel and accessories	0	0	0	0	0	0	0	0	0	0	0	0
67	1431	Manufacture of knitted and crocheted hosiery	0	0	0	0	0	0	0	0	0	0	0	0
68	1439	Manufacture of other knitted and crocheted apparel	0	0	0	0	0	0	0	0	0	0	0	0
69	1511	Tanning and dressing of leather; dressing and dyeing of fur	0	0	0	0	0	0	0	0	0	0	0	0
70	1520	Manufacture of footwear	0	0	0	0	0	0	0	0	0	0	0	0
71	1610	Sawmilling and planing of wood	0	0	0	0	0	0	0	0	0	0	0	0
72	1621	Manufacture of veneer sheets and woodbased panels	0	0	0	0	0	0	0	0	0	0	0	0
73	1623	Manufacture of other builders' carpentry and joinery	0	0	0	0	0	0	0	0	0	0	0	0
74	1624	Manufacture of wooden containers	0	0	0	0	0	0	0	0	0.46	0.06	0	0
75	1629	Manufacture of other products of wood; manufacture of articles of cork, straw and plaiting materials	0	0	0	0	0	0	0	0	0.06	0	0	0

			Pollution Prevention and Control (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
76	1711	Manufacture of pulp	0	0	0	0	0.06	0	0	0	27.33	16.25	0	0
77	1712	Manufacture of paper and paperboard	0	0	0	0	0	0	0	0	1.41	0	0	0
78	1721	Manufacture of corrugated paper and paperboard and of containers of paper and paperboard	0	0	0	0	0	0	0	0	0	0	0	0
79	1722	Manufacture of household and sanitary goods and of toilet requisites	0	0	0	0	0	0	0	0	0.01	0	0	0
80	1723	Manufacture of paper stationery	0	0	0	0	0	0	0	0	0	0	0	0
81	1729	Manufacture of other articles of paper and paperboard	0	0	0	0	0	0	0	0	0	0	0	0
82	1811	Printing of newspapers	0	0	0	0	0	0	0	0	0	0	0	0
83	1812	Other printing	0	0	0	0	0	0	0	0	0	0	0	0
84	1920	Manufacture of refined petroleum products	0	0	0	0	0	0	0	0	9.91	4.71	0	0
85	2011	Manufacture of industrial gases	0	0	0	0	0	0	0	0	0	0	0	0
86	2012	Manufacture of dyes and pigments	0	0	0	0	0	0	0	0	0	0	0	0
87	2013	Manufacture of other inorganic basic chemicals	0.91	0	0	0	0	0	0	0	4.47	2.05	0	0
88	2014	Manufacture of other organic basic chemicals	0.01	0	0	0	0	0	0	0	2.95	0.27	0	0
89	2015	Manufacture of fertilisers and nitrogen compounds	0	0	0	0	0	0	0	0	2.51	1.95	0	0
90	2016	Manufacture of plastics in primary forms	0	0	0	0	0	0	0	0	0.05	0	0	0
91	2017	Manufacture of synthetic rubber in primary forms	0	0	0	0	0	0	0	0	5	0	0	0
92	2020	Manufacture of pesticides and other agrochemical products	0	0	0	0	0	0	0	0	0	0	0	0
93	2030	Manufacture of paints, varnishes and similar coatings, printing ink and mastics	0	0	0	0	0	0	0	0	0	0	0	0
94	2041	Manufacture of soap and detergents, cleaning and polishing preparations	0	0	0	0	0	0	0	0	0	0	0	0
95	2042	Manufacture of perfumes and toilet preparations	0	0	0	0	0	0	0	0	0.32	0	0	0
96	2051	Manufacture of explosives	0	0	0	0	0	0	0	0	0	0	0	0
97	2052	Manufacture of glues	0	0	0	0	0	0	0	0	0	0	0	0
98	2059	Manufacture of other chemical products n.e.c.	0	0	0	0	0	0	0	0	0.01	0	0	0
99	2060	Manufacture of manmade fibres	0	0	0	0	0	0	0	0	0	0	0	0
100	2110	Manufacture of basic pharmaceutical products	0.01	0	0	0	0	0	0	0	0.01	0	0	0
101	2120	Manufacture of pharmaceutical preparations	24.24	0	0	0	0	0	0	0	30.45	0	0	0
102	2211	Manufacture of rubber tyres and tubes; retreading and rebuilding of rubber tyres	0	0	0	0	0	0	0	0	4.29	0	0	0
103	2219	Manufacture of other rubber products	0	0	0	0	0	0	0	0	0	0	0	0
104	2221	Manufacture of plastic plates, sheets, tubes and profiles	0	0	0	0	0	0	0	0	0	0	0	0
105	2222	Manufacture of plastic packing goods	0	0	0	0	0	0	0	0	4.33	0	0	0
106	2223	Manufacture of builders' ware of plastic	0	0	0	0	0	0	0	0	0	0	0	0
107	2229	Manufacture of other plastic products	0	0	0	0	0	0	0	0	3.87	3.16	0	0
108	2311	Manufacture of flat glass	0	0	0	0	0	0	0	0	0	0	0	0
109	2313	Manufacture of hollow glass	0.06	0.06	0	0	0	0	0	0	3.35	2.91	0	0
110	2314	Manufacture of glass fibres	0	0	0	0	0	0	0	0	0.02	0	0	0
111	2320	Manufacture of refractory products	0	0	0	0	0	0	0	0	0.04	0	0	0
112	2331	Manufacture of ceramic tiles and flags	0	0	0	0	0	0	0	0	0.04	0	0	0
113	2332	Manufacture of bricks, tiles and construction products, in baked clay	0	0	0	0	0	0	0	0	0	0	0	0
114	2342	Manufacture of ceramic sanitary fixtures	0	0	0	0	0	0	0	0	0	0	0	0
115	2344	Manufacture of other technical ceramic products	0	0	0	0	0	0	0	0	0	0	0	0
116	2349	Manufacture of other ceramic products	0	0	0	0	0	0	0	0	0	0	0	0

			Pollution Prevention and Control (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
117	2351	Manufacture of cement	0	0	0	0	0	0	0	0	12.51	1.66	0	0
118	2352	Manufacture of lime and plaster	0	0	0	0	0	0	0	0	2.51	0	0	0
119	2364	Manufacture of mortars	0	0	0	0	0	0	0	0	0	0	0	0
120	2370	Cutting, shaping and finishing of stone	0	0	0	0	0	0	0	0	0	0	0	0
121	2399	Manufacture of other non-metallic mineral products n.e.c.	0	0	0	0	0	0	0	0	1.99	0	0	0
122	2410	Manufacture of basic iron and steel and of ferroalloys	0	0	0	0	0	0	0	0	32.31	8.88	0	0
123	2431	Cold drawing of bars	0	0	0	0	0	0	0	0	0	0	0	0
124	2432	Cold rolling of narrow strip	0	0	0	0	0	0	0	0	0	0	0	0
125	2433	Cold forming or folding	0	0	0	0	0	0	0	0	0	0	0	0
126	2434	Cold drawing of wire	0	0	0	0	0	0	0	0	0	0	0	0
127	2442	Aluminium production	0	0	0	0	0	0	0	0	13.37	0	0	0
128	2443	Lead, zinc and tin production	0	0	0	0	0	0	0	0	0	0	0	0
129	2444	Copper production	0	0	0	0	0	0	0	0	0	0	0	0
130	2445	Other nonferrous metal production	0	0	0	0	0	0	0	0	268.05	255.32	0	0
131	2446	Processing of nuclear fuel	0	0	0	0	0	0	0	0	0	0	0	0
132	2451	Casting of iron	0	0	0	0	0	0	0	0	0	0	0	0
133	2452	Casting of steel	0	0	0	0	0	0	0	0	0	0	0	0
134	2453	Casting of light metals	0	0	0	0	0	0	0	0	0	0	0	0
135	2454	Casting of other nonferrous metals	0	0	0	0	0	0	0	0	0.09	0	0	0
136	2511	Manufacture of metal structures and parts of structures	0	0	0	0	0	0	0	0	0.78	0	0	0
137	2512	Manufacture of doors and windows of metal	0	0	0	0	0	0	0	0	0	0	0	0
138	2521	Manufacture of central heating radiators and boilers	0	0	0	0	0	0	0	0	0	0	0	0
139	2529	Manufacture of other tanks, reservoirs and containers of metal	0	0	0	0	0	0	0	0	0	0	0	0
140	2540	Manufacture of weapons and ammunition	0	0	0	0	0	0	0	0	0	0	0	0
141	2550	Forging, pressing, stamping and rollforming of metal; powder metallurgy	0	0	0	0	0	0	0	0	20.33	5.39	0	0
142	2561	Treatment and coating of metals	0	0	0	0	0	0	0	0	2.98	0	0	0
143	2562	Machining	0	0	0	0	0	0	0	0	0	0	0	0
144	2571	Manufacture of cutlery	0	0	0	0	0	0	0	0	0	0	0	0
145	2572	Manufacture of locks and hinges	0	0	0	0	0	0	0	0	0	0	0	0
146	2573	Manufacture of tools	0	0	0	0	0	0	0	0	0	0	0	0
147	2592	Manufacture of light metal packaging	0	0	0	0	0	0	0	0	0	0	0	0
148	2593	Manufacture of wire products, chain and springs	0	0	0	0	0	0	0	0	1.29	0	0	0
149	2594	Manufacture of fasteners and screw machine products	0	0	0	0	0	0	0	0	0	0	0	0
150	2599	Manufacture of other fabricated metal products n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0
151	2611	Manufacture of electronic components	0	0	0	0	0	0	0	0	0	0	0	0
152	2612	Manufacture of loaded electronic boards	0	0	0	0	0	0	0	0	0.32	0	0	0
153	2620	Repair of computers and peripheral equipment	0	0	0	0	0	0	0	0	0	0	0	0
154	2630	Manufacture of communication equipment	0	0	0	0	0	0	0	0	0.04	0	0	0
155	2651	Manufacture of instruments and appliances for measuring, testing and navigation	0	0	0	0	0	0	0	0	0.11	0	0	0
156	2652	Manufacture of watches and clocks	0	0	0	0	0	0	0	0	0	0	0	0
157	2660	Manufacture of irradiation, electromedical and electrotherapeutic equipment	0	0	0	0	0	0	0	0	0	0	0	0
158	2670	Manufacture of optical instruments and photographic equipment	0	0	0	0	0	0	0	0	0	0	0	0

			Pollution Prevention and Control (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
159	2711	Manufacture of electric motors, generators and transformers	0	0	0	0	0	0	0	0	16.1	0	0	0
160	2720	Manufacture of batteries and accumulators	0	0	0	0	0	0	0	0	0	0	0	0
161	2731	Manufacture of fibre optic cables	0	0	0	0	0	0	0	0	0	0	0	0
162	2733	Manufacture of wiring devices	0	0	0	0	0	0	0	0	0	0	0	0
163	2740	Manufacture of electric lighting equipment	0	0	0	0	0	0	0	0	0.01	0	0	0
164	2751	Manufacture of electric domestic appliances	0	0	0	0	0	0	0	0	0.01	0	0	0
165	2790	Manufacture of other electrical equipment	0	0	0	0	0	0	0	0	9.59	2.48	0	0
166	2811	Manufacture of engines and turbines, except aircraft, vehicle and cycle engines	0	0	0	0	0	0	0	0	0.16	0	0	0
167	2812	Manufacture of fluid power equipment	0	0	0	0	0	0	0	0	0	0	0	0
168	2813	Manufacture of other pumps and compressors	0	0	0	0	0	0	0	0	0	0	0	0
169	2814	Manufacture of other taps and valves	0	0	0	0	0	0	0	0	0	0	0	0
170	2815	Manufacture of bearings, gears, gearing and driving elements	0	0	0	0	0	0	0	0	1.81	0	0	0
171	2821	Manufacture of ovens, furnaces and furnace burners	0	0	0	0	0	0	0	0	0	0	0	0
172	2822	Manufacture of lifting and handling equipment	0	0	0	0	0	0	0	0	10.08	0	0	0
173	2825	Manufacture of nondomestic cooling and ventilation equipment	0	0	0	0	0	0	0	0	0	0	0	0
174	2829	Manufacture of other general purpose machinery n.e.c.	0	0	0	0	0	0	0	0	0.89	0	0	0
175	2830	Manufacture of agricultural and forestry machinery	0	0	0	0	0	0	0	0	0	0	0	0
176	2841	Manufacture of metal forming machinery	0	0	0	0	0	0	0	0	0	0	0	0
177	2849	Manufacture of other machine tools	0	0	0	0	0	0	0	0	0.15	0	0	0
178	2891	Manufacture of machinery for metallurgy	0	0	0	0	0	0	0	0	0	0	0	0
179	2892	Manufacture of machinery for mining, quarrying and construction	0	0	0	0	0	0	0	0	0	0	0	0
180	2893	Manufacture of machinery for food, beverage and tobacco processing	0	0	0	0	0	0	0	0	0	0	0	0
181	2894	Manufacture of machinery for textile, apparel and leather production	0	0	0	0	0	0	0	0	0	0	0	0
182	2895	Manufacture of machinery for paper and paperboard production	0	0	0	0	0	0	0	0	0	0	0	0
183	2896	Manufacture of plastics and rubber machinery	0	0	0	0	0	0	0	0	0	0	0	0
184	2899	Manufacture of other special purpose machinery n.e.c.	0	0	0	0	0	0	0	0	0.04	0	0	0
185	2910	Manufacture of motor vehicles	0	0	0	0	0	0	0	0	80.06	10.48	0	0
186	2920	Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semitrailers	0	0	0	0	0	0	0	0	0	0	0	0
187	2931	Manufacture of electrical and electronic equipment for motor vehicles	0	0	0	0	0	0	0	0	0	0	0	0
188	2932	Manufacture of other parts and accessories for motor vehicles	0	0	0	0	0	0	0	0	125.75	57.98	0	0
189	3011	Building of ships and floating structures	0	0	0	0	0	0	0	0	7.92	4.56	0	0
190	3020	Manufacture of railway locomotives and rolling stock	0	0	0	0	0	0	0	0	19.71	16.29	0	0
191	3030	Manufacture of air and spacecraft and related machinery	0	0	0	0	0	0	0	0	0	0	0	0
192	3040	Manufacture of military fighting vehicles	0	0	0	0	0	0	0	0	0	0	0	0
193	3092	Manufacture of bicycles and invalid carriages	0	0	0	0	0	0	0	0	0	0	0	0
194	3099	Manufacture of other transport equipment n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0
195	3101	Manufacture of office and shop furniture	0	0	0	0	0	0	0	0	0	0	0	0
196	3102	Manufacture of kitchen furniture	0	0	0	0	0	0	0	0	0	0	0	0
197	3103	Manufacture of mattresses	0	0	0	0	0	0	0	0	0	0	0	0
198	3109	Manufacture of other furniture	0	0	0	0	0	0	0	0	0	0	0	0
199	3213	Manufacture of imitation jewellery and related articles	0	0	0	0	0	0	0	0	0	0	0	0

			Pollution Prevention and Control (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
200	3230	Manufacture of sports goods	0	0	0	0	0	0	0	0	0	0	0	0
201	3240	Manufacture of games and toys	0	0	0	0	0	0	0	0	0	0	0	0
202	3250	Manufacture of medical and dental instruments and supplies	0	0	0	0	0	0	0	0	0	0	0	0
203	3291	Manufacture of brooms and brushes	0	0	0	0	0	0	0	0	0	0	0	0
204	3299	Other manufacturing n.e.c.	0.04	0	0	0	0	0	0	0	2.54	0	0	0
205	3312	Repair of machinery	0	0	0	0	0	0	0	0	0.17	0	0	0
206	3314	Repair of electrical equipment	0	0	0	0	0	0	0	0	0	0	0	0
207	3317	Repair and maintenance of other transport equipment	0	0	0	0	0	0	0	0	0.2	0.03	0	0
208	3320	Installation of industrial machinery and equipment	0	0	0	0	0	0	0	0	0	0	0	0
209	3511	Production of electricity	0	0	0	0	0	0	0	0	1047.22	387.38	0	0
210	3512	Transmission of electricity	0	0	0	0	0	0	0	0	11.6	0	0	0
211	3513	Distribution of electricity	0	0	0	0	0	0	0	0	269.96	175.75	0	0
212	3514	Trade of electricity	0	0	0	0	0	0	0	0	118.11	0.24	0	0
213	3521	Manufacture of gas	0	0	0	0	0	0	0	0	30.83	28.19	0	0
214	3522	Distribution of gaseous fuels through mains	0	0	0	0	0	0	0	0	264.38	241.39	0	0
215	3523	Trade of gas through mains	0	0	0	0	0	0	0	0	136.22	123.97	0	0
216	3600	Water collection, treatment and supply	0.39	0.31	0	0	0	0	0	0	185.91	155.4	0	0
217	3811	Collection of non-hazardous waste	0	0	0	0	0	0	0	0	10.87	0.29	0	0
218	3821	Treatment and disposal of non-hazardous waste	0	0	0	0	0	0	0	0	1.58	0	0	0
219	3822	Treatment and disposal of hazardous waste	0	0	0	0	0	0	0	0	0.04	0	0	0
220	3831	Dismantling of wrecks	0	0	0	0	0	0	0	0	4.25	0	0	0
221	3832	Recovery of sorted materials	0	0	0	0	0	0	0	0	16.68	15.23	0	0
222	3900	Remediation activities and other waste management services	0	0	0	0	0	0	0	0	0	0	0	0
223	4110	Development of building projects	0	0	0	0	34.1	0	0	0	111.36	0	0	0
224	4120	Construction of residential and non-residential buildings	0	0	0	0	0	0	0	0	11.74	0	0	0
225	4211	Construction of roads and motorways	0	0	0	0	0	0	0	0	14.3	1.38	0	0
226	4212	Construction of railways and underground railways	0	0	0	0	0	0	0	0	342.58	213.37	0	0
227	4213	Construction of bridges and tunnels	0	0	0	0	0	0	0	0	10.9	0	0	0
228	4221	Construction of utility projects for fluids	0	0	0	0	0	0	0	0	0	0	0	0
229	4222	Construction of utility projects for electricity and telecommunications	0	0	0	0	0.01	0	0	0	19.45	6.97	0	0
230	4291	Construction of water projects	0	0	0	0	0	0	0	0	0.06	0	0	0
231	4299	Construction of other civil engineering projects n.e.c.	0	0	0	0	0	0	0	0	67.94	4.33	0	0
232	4311	Demolition	0	0	0	0	0	0	0	0	0	0	0	0
233	4312	Site preparation	0	0	0	0	0	0	0	0	0	0	0	0
234	4322	Plumbing, heat and airconditioning installation	0	0	0	0	0	0	0	0	0.06	0	0	0
235	4329	Other construction installation	0	0	0	0	0	0	0	0	0	0	0	0
236	4333	Floor and wall covering	0	0	0	0	0	0	0	0	0	0	0	0
237	4334	Painting and glazing	0	0	0	0	0	0	0	0	0	0	0	0
238	4339	Other building completion and finishing	0	0	0	0	0	0	0	0	0	0	0	0
239	4391	Roofing activities	0	0	0	0	0	0	0	0	0	0	0	0
240	4399	Other specialised construction activities n.e.c.	0	0	0	0	0	0	0	0	35.97	0.55	0	0
241	4511	Sale of cars and light motor vehicles	0	0	0	0	0	0	0	0	13.85	0	0	0

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242	4520	Maintenance and repair of motor vehicles	0	0	0	0	0	0	0	0	0	0	0	0
243	4531	Wholesale trade of motor vehicle parts and accessories	0	0	0	0	0	0	0	0	2.09	0	0	0
244	4532	Retail trade of motor vehicle parts and accessories	0	0	0	0	0	0	0	0	0	0	0	0
245	4612	Agents involved in the sale of fuels, ores, metals and industrial chemicals	0	0	0	0	0	0	0	0	11.98	0.08	0	0
246	4613	Agents involved in the sale of timber and building materials	0	0	0	0	0	0	0	0	0	0	0	0
247	4615	Agents involved in the sale of furniture, household goods, hardware and ironmongery	0	0	0	0	0	0	0	0	0	0	0	0
248	4616	Agents involved in the sale of textiles, clothing, fur, footwear and leather goods	0	0	0	0	0	0	0	0	0	0	0	0
249	4617	Agents involved in the sale of food, beverages and tobacco	0	0	0	0	0	0	0	0	0.31	0	0	0
250	4618	Agents specialised in the sale of other particular products	0	0	0	0	0	0	0	0	0	0	0	0
251	4619	Agents involved in the sale of a variety of goods	0	0	0	0	0	0	0	0	0	0	0	0
252	4621	Wholesale of grain, unmanufactured tobacco, seeds and animal feeds	0	0	0	0	0	0	0	0	0	0	0	0
253	4622	Wholesale of flowers and plants	0	0	0	0	0	0	0	0	0	0	0	0
254	4623	Wholesale of live animals	0	0	0	0	0	0	0	0	0	0	0	0
255	4624	Wholesale of hides, skins and leather	0	0	0	0	0	0	0	0	0	0	0	0
256	4631	Wholesale of fruit and vegetables	0	0	0	0	0	0	0	0	0.84	0	0	0
257	4632	Wholesale of meat and meat products	0	0	0	0	0	0	0	0	0	0	0	0
258	4633	Wholesale of dairy products, eggs and edible oils and fats	0	0	0	0	0	0	0	0	0	0	0	0
259	4634	Wholesale of beverages	0	0	0	0	0	0	0	0	0	0	0	0
260	4635	Wholesale of tobacco products	0	0	0	0	0	0	0	0	0.03	0	0	0
261	4636	Wholesale of sugar and chocolate and sugar confectionery	0	0	0	0	0	0	0	0	0	0	0	0
262	4637	Wholesale of coffee, tea, cocoa and spices	0	0	0	0	0	0	0	0	0	0	0	0
263	4638	Wholesale of other food, including fish, crustaceans and molluscs	0	0	0	0	0	0	0	0	2.81	0	0	0
264	4639	Nonspecialised wholesale of food, beverages and tobacco	0	0	0	0	0	0	0	0	0.63	0	0	0
265	4641	Wholesale of textiles	0	0	0	0	0	0	0	0	0	0	0	0
266	4642	Wholesale of clothing and footwear	0	0	0	0	0	0	0	0	0.58	0	0	0
267	4644	Wholesale of china and glassware and cleaning materials	0	0	0	0	0	0	0	0	0	0	0	0
268	4645	Wholesale of perfume and cosmetics	0	0	0	0	0	0	0	0	2.17	0	0	0
269	4646	Wholesale of pharmaceutical goods	0	0	0	0	0	0	0	0	0	0	0	0
270	4647	Wholesale of furniture, carpets and lighting equipment	0	0	0	0	0	0	0	0	0	0	0	0
271	4648	Wholesale of watches and jewellery	0	0	0	0	0	0	0	0	0.17	0	0	0
272	4649	Wholesale of other household goods	0	0	0	0	0	0	0	0	0	0	0	0
273	4651	Wholesale of computers, computer peripheral equipment and software	0	0	0	0	0	0	0	0	2.15	0	0	0
274	4652	Wholesale of electronic and telecommunications equipment and parts	0	0	0	0	0	0	0	0	0.01	0	0	0
275	4661	Wholesale of agricultural machinery, equipment and supplies	0	0	0	0	0	0	0	0	0	0	0	0
276	4662	Wholesale of machine tools	0	0	0	0	0	0	0	0	0	0	0	0
277	4663	Wholesale of mining, construction and civil engineering machinery	0	0	0	0	0	0	0	0	0	0	0	0
278	4664	Wholesale of machinery for the textile industry and of sewing and knitting machines	0	0	0	0	0	0	0	0	0	0	0	0
279	4665	Wholesale of office furniture	0	0	0	0	0	0	0	0	0	0	0	0
280	4666	Wholesale of other office machinery and equipment	0	0	0	0	0	0	0	0	0	0	0	0
281	4669	Wholesale of other machinery and equipment	0	0	0	0	0	0	0	0	0.41	0	0	0
282	4671	Wholesale of solid, liquid and gaseous fuels and related products	0	0	0	0	0	0	0	0	2.04	0.02	0	0

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283	4672	Wholesale of metals and metal ores	0	0	0	0	0	0	0	0	30.94	1.83	0	0
284	4673	Wholesale of wood, construction materials and sanitary equipment	0	0	0	0	0	0	0	0	1	0	0	0
285	4674	Wholesale of hardware, plumbing and heating equipment and supplies	0	0	0	0	0	0	0	0	0	0	0	0
286	4675	Wholesale of chemical products	0	0	0	0	0	0	0	0	0	0	0	0
287	4676	Wholesale of other intermediate products	0	0	0	0	0	0	0	0	18.42	9.21	0	0
288	4677	Wholesale of waste and scrap	0	0	0	0	0	0	0	0	0.03	0	0	0
289	4690	Nonspecialised wholesale trade	0	0	0	0	0	0	0	0	0	0	0	0
290	4711	Retail sale in nonspecialised stores with food, beverages or tobacco predominating	0	0	0	0	0.04	0	0	0	181.31	22.81	0	0
291	4719	Other retail sale in nonspecialised stores	0	0	0	0	0	0	0	0	11.36	0.93	0	0
292	4721	Retail sale of fruit and vegetables in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0
293	4722	Retail sale of meat and meat products in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0
294	4723	Retail sale of fish, crustaceans and molluscs in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0
295	4724	Retail sale of bread, cakes, flour confectionery and sugar confectionery in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0
296	4726	Retail sale of tobacco products in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0
297	4729	Other retail sale of food in specialised stores	0	0	0	0	0	0	0	0	0.32	0	0	0
298	4730	Retail sale of automotive fuel in specialised stores	0	0	0	0	0	0	0	0	20.38	0	0	0
299	4741	Retail sale of computers, peripheral units and software in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0
300	4742	Retail sale of telecommunications equipment in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0
301	4751	Retail sale of textiles in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0
302	4752	Retail sale of hardware, paints and glass in specialised stores	0	0	0	0	0	0	0	0	6.2	0	0	0
303	4759	Retail sale of furniture, lighting equipment and other household articles in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0
304	4761	Retail sale of books in specialised stores	0	0	0	0	0	0	0	0	0.3	0	0	0
305	4762	Retail sale of newspapers and stationery in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0
306	4764	Retail sale of sporting equipment in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0
307	4765	Retail sale of games and toys in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0
308	4771	Retail sale of clothing in specialised stores	0	0	0	0	0	0	0	0	3.46	1.01	0	0
309	4772	Retail sale of footwear and leather goods in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0
310	4774	Retail sale of medical and orthopaedic goods in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0
311	4775	Retail sale of cosmetic and toilet articles in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0
312	4777	Retail sale of watches and jewellery in specialised stores	0	0	0	0	0	0	0	0	0	0	0	0
313	4778	Other retail sale of new goods in specialised stores	0	0	0	0	0	0	0	0	0.34	0	0	0
314	4781	Retail sale via stalls and markets of food, beverages and tobacco products	0	0	0	0	0	0	0	0	0	0	0	0
315	4782	Retail sale via stalls and markets of textiles, clothing and footwear	0	0	0	0	0	0	0	0	0	0	0	0
316	4791	Retail sale via mail order houses or via Internet	0	0	0	0	0	0	0	0	0.17	0.07	0	0
317	4799	Other retail sale not in stores, stalls or markets	0	0	0	0	0	0	0	0	0.02	0	0	0
318	4910	Passenger rail transport, interurban	0	0	0	0	0	0	0	0	553.71	477.09	0	0
319	4920	Freight rail transport	0	0	0	0	0	0	0	0	0	0	0	0
320	4931	Urban and suburban passenger land transport	0	0	0	0	0	0	0	0	178.9	155.7	0	0
321	4932	Taxi operation	0	0	0	0	0	0	0	0	0	0	0	0
322	4939	Other passenger land transport n.e.c.	0	0	0	0	0	0	0	0	0.39	0	0	0
323	4941	Freight transport by road	0	0	0	0	0	0	0	0	3	0	0	0

			Pollution Prevention and Control (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
324	4950	Transport via pipeline	0	0	0	0	0	0	0	0	0	0	0	0
325	5010	Sea and coastal passenger water transport	0	0	0	0	0	0	0	0	8.55	0	0	0
326	5020	Sea and coastal freight water transport	0	0	0	0	0	0	0	0	0	0	0	0
327	5040	Inland freight water transport	0	0	0	0	0	0	0	0	0	0	0	0
328	5110	Passenger air transport	0	0	0	0	0	0	0	0	0.77	0	0	0
329	5122	Space transport	0	0	0	0	0	0	0	0	0.08	0	0	0
330	5210	Warehousing and storage	0	0	0	0	0	0	0	0	0.08	0	0	0
331	5221	Service activities incidental to land transportation	0	0	0	0	0.05	0	0	0	47.44	3.66	0	0
332	5222	Service activities incidental to water transportation	0	0	0	0	0	0	0	0	0.01	0	0	0
333	5223	Service activities incidental to air transportation	0	0	0	0	0	0	0	0	89.96	62.32	0	0
334	5224	Cargo handling	0	0	0	0	0	0	0	0	0	0	0	0
335	5229	Other transportation support activities	0	0	0	0	0	0	0	0	0.07	0	0	0
336	5320	Other postal and courier activities	0	0	0	0	0	0	0	0	0	0	0	0
337	5510	Hotels and similar accommodation	0	0	0	0	80.25	0	0	0	280.58	0.83	0	0
338	5520	Holiday and other short-stay accommodation	0	0	0	0	0	0	0	0	0	0	0	0
339	5530	Camping grounds, recreational vehicle parks and trailer parks	0	0	0	0	0	0	0	0	0	0	0	0
340	5590	Other accommodation	0	0	0	0	0	0	0	0	0	0	0	0
341	5610	Restaurants and mobile food service activities	0	0	0	0	0	0	0	0	1.51	0	0	0
342	5621	Event catering activities	0	0	0	0	0	0	0	0	0	0	0	0
343	5629	Other food service activities	0	0	0	0	0	0	0	0	0	0	0	0
344	5630	Beverage serving activities	0	0	0	0	0	0	0	0	0	0	0	0
345	5811	Book publishing	0	0	0	0	0	0	0	0	1.08	0	0	0
346	5813	Publishing of newspapers	0	0	0	0	0	0	0	0	0	0	0	0
347	5819	Other publishing activities	0	0	0	0	0	0	0	0	0.08	0	0	0
348	5821	Publishing of computer games	0	0	0	0	0	0	0	0	0	0	0	0
349	5829	Other software publishing	0	0	0	0	0	0	0	0	0.05	0	0	0
350	5912	Motion picture, video and television programme postproduction activities	0	0	0	0	0	0	0	0	0.3	0	0	0
351	6010	Radio broadcasting	0	0	0	0	0	0	0	0	0	0	0	0
352	6020	Television programming and broadcasting activities	0	0	0	0	0	0	0	0	64.77	0.43	0	0
353	6110	Wired telecommunications activities	0	0	0	0	0	0	0	0	24.24	7.44	0	0
354	6120	Wireless telecommunications activities	0	0	0	0	0	0	0	0	0	0	0	0
355	6130	Satellite telecommunications activities	0	0	0	0	0	0	0	0	0.02	0	0	0
356	6201	Computer programming activities	0	0	0	0	0	0	0	0	31.75	18.18	0	0
357	6202	Computer consultancy activities	0	0	0	0	0	0	0	0	0.74	0	0	0
358	6203	Computer facilities management activities	0	0	0	0	0	0	0	0	0.09	0	0	0
359	6209	Other information technology and computer service activities	0	0	0	0	0	0	0	0	0.07	0	0	0
360	6311	Data processing, hosting and related activities	0	0	0	0	0	0	0	0	0	0	0	0
361	6312	Web portals	0	0	0	0	0	0	0	0	0	0	0	0
362	6391	News agency activities	0	0	0	0	0	0	0	0	0	0	0	0
363	6399	Other information service activities n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0
364	6419	Other monetary intermediation	0	0	0	0	0	0	0	0	0	0	0	0
365	6420	Activities of holding companies	0	0	0	0	8.61	0	0	0	782.22	644.55	0	0

			Pollution Prevention and Control (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
366	6430	Trusts, funds and similar financial entities	0	0	0	0	0	0	0	0	0	0	0	0
367	6619	Other activities auxiliary to financial services, except insurance and pension funding	0	0	0	0	0	0	0	0	420.46	419.31	0	0
368	6622	Activities of insurance agents and brokers	0	0	0	0	0	0	0	0	0.02	0	0	0
369	6810	Buying and selling of own real estate	0.03	0	0	0	0	0	0	0	7.87	0	0	0
370	6820	Renting and operating of own or leased real estate	0.2	0	0	0	0	0	0	0	110.7	4.79	0	0
371	6831	Real estate agencies	0	0	0	0	0	0	0	0	0.61	0.61	0	0
372	6920	Accounting, bookkeeping and auditing activities; tax consultancy	0	0	0	0	0	0	0	0	28.46	0.18	0	0
373	7010	Activities of head offices	0	0	0	0	0	0	0	0	31.21	3.86	0	0
374	7021	Public relations and communication activities	0	0	0	0	0	0	0	0	0	0	0	0
375	7022	Business and other management consultancy activities	0	0	0	0	0	0	0	0	15.97	1.46	0	0
376	7111	Architectural activities	0	0	0	0	0	0	0	0	0	0	0	0
377	7112	Engineering activities and related technical consultancy	0.37	0.29	0	0	0	0	0	0	54.2	2.16	0	0
378	7120	Technical testing and analysis	2.82	2.72	0	0	0	0	0	0	2.82	2.72	0	0
379	7219	Other research and experimental development on natural sciences and engineering	0	0	0	0	0	0	0	0	0.11	0	0	0
380	7220	Research and experimental development on social sciences and humanities	0.08	0	0	0	0	0	0	0	0.08	0	0	0
381	7311	Advertising agencies	0	0	0	0	0	0	0	0	0.01	0	0	0
382	7410	Specialised design activities	0	0	0	0	0	0	0	0	0	0	0	0
383	7420	Photographic activities	0	0	0	0	0	0	0	0	0	0	0	0
384	7490	Other professional, scientific and technical activities n.e.c.	0	0	0	0	0	0	0	0	14.05	0.49	0	0
385	7500	Veterinary activities	0	0	0	0	0	0	0	0	0	0	0	0
386	7711	Renting and leasing of cars and light motor vehicles	0	0	0	0	0	0	0	0	15.04	0.7	0	0
387	7712	Renting and leasing of trucks	0	0	0	0	0	0	0	0	0.03	0	0	0
388	7732	Renting and leasing of construction and civil engineering machinery and equipment	0	0	0	0	0	0	0	0	4.57	0	0	0
389	7733	Renting and leasing of office machinery and equipment (including computers)	0	0	0	0	0	0	0	0	0	0	0	0
390	7734	Renting and leasing of water transport equipment	0	0	0	0	0	0	0	0	0	0	0	0
391	7735	Renting and leasing of air transport equipment	0	0	0	0	0	0	0	0	4.09	0.4	0	0
392	7739	Renting and leasing of other machinery, equipment and tangible goods n.e.c.	0	0	0	0	0	0	0	0	12.99	0.47	0	0
393	7740	Leasing of intellectual property and similar products, except copyrighted works	0	0	0	0	0	0	0	0	0	0	0	0
394	7810	Activities of employment placement agencies	0	0	0	0	0	0	0	0	0	0	0	0
395	7830	Other human resources provision	0	0	0	0	0	0	0	0	0	0	0	0
396	7911	Travel agency activities	0	0	0	0	0	0	0	0	0.34	0	0	0
397	7912	Tour operator activities	0	0	0	0	0	0	0	0	0	0	0	0
398	7990	Other reservation service and related activities	0	0	0	0	0	0	0	0	0	0	0	0
399	8010	Private security activities	0	0	0	0	0	0	0	0	0.35	0	0	0
400	8020	Security systems service activities	0.28	0.26	0	0	0	0	0	0	3.68	0.87	0	0
401	8110	Combined facilities support activities	0	0	0	0	0	0	0	0	0.07	0	0	0
402	8121	General cleaning of buildings	0	0	0	0	0	0	0	0	0.11	0.08	0	0
403	8122	Other building and industrial cleaning activities	0	0	0	0	0	0	0	0	2.44	0	0	0
404	8130	Landscape service activities	0	0	0	0	0	0	0	0	0	0	0	0
405	8211	Combined office administrative service activities	0	0	0	0	0	0	0	0	0	0	0	0
406	8219	Photocopying, document preparation and other specialised office support activities	0	0	0	0	0	0	0	0	0	0	0	0
407	8220	Activities of call centres	0	0	0	0	0	0	0	0	0	0	0	0

			Pollution Prevention and Control (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
408	8230	Organisation of conventions and trade shows	0	0	0	0	0	0	0	0	0	0	0	0
409	8291	Activities of collection agencies and credit bureaus	0	0	0	0	0	0	0	0	0	0	0	0
410	8292	Packaging activities	0	0	0	0	0	0	0	0	0	0	0	0
411	8299	Other business support service activities n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0
412	8412	Regulation of the activities of providing health care, education, cultural services and other social services, excluding social security	0	0	0	0	0	0	0	0	0	0	0	0
413	8424	Public order and safety activities	0	0	0	0	0	0	0	0	0	0	0	0
414	8520	Primary education	0	0	0	0	0	0	0	0	0	0	0	0
415	8531	General secondary education	0	0	0	0	0	0	0	0	0	0	0	0
416	8532	Technical and vocational secondary education	0	0	0	0	0	0	0	0	0	0	0	0
417	8541	Post-secondary non-tertiary education	0	0	0	0	0	0	0	0	0.01	0	0	0
418	8552	Cultural education	0	0	0	0	0	0	0	0	0	0	0	0
419	8559	Other education n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0
420	8560	Educational support activities	0	0	0	0	0	0	0	0	0	0	0	0
421	8610	Hospital activities	0	0	0	0	0	0	0	0	14.08	0	0	0
422	8621	General medical practice activities	0	0	0	0	0	0	0	0	0	0	0	0
423	8622	Specialist medical practice activities	0	0	0	0	0	0	0	0	0	0	0	0
424	8623	Dental practice activities	0	0	0	0	0	0	0	0	0	0	0	0
425	8690	Other human health activities	0.01	0	0	0	0	0	0	0	0.01	0	0	0
426	8710	Residential nursing care activities	0	0	0	0	0	0	0	0	0	0	0	0
427	8720	Residential care activities for mental retardation, mental health and substance abuse	0	0	0	0	0	0	0	0	0.02	0.01	0	0
428	8730	Residential care activities for the elderly and disabled	0	0	0	0	0	0	0	0	3.33	0.04	0	0
429	8790	Other residential care activities	0	0	0	0	0	0	0	0	4.7	0	0	0
430	8810	Social work activities without accommodation for the elderly and disabled	0	0	0	0	0	0	0	0	0	0	0	0
431	8891	Child daycare activities	0	0	0	0	0	0	0	0	0	0	0	0
432	8899	Other social work activities without accommodation n.e.c.	0	0	0	0	0	0	0	0	0	0	0	0
433	9001	Performing arts	0	0	0	0	0	0	0	0	0	0	0	0
434	9003	Artistic creation	0	0	0	0	0	0	0	0	0	0	0	0
435	9004	Operation of arts facilities	0	0	0	0	0	0	0	0	0	0	0	0
436	9200	Gambling and betting activities	0	0	0	0	0	0	0	0	0	0	0	0
437	9311	Operation of sports facilities	0	0	0	0	0	0	0	0	0	0	0	0
438	9312	Activities of sport clubs	0	0	0	0	0	0	0	0	0	0	0	0
439	9313	Fitness facilities	0	0	0	0	0	0	0	0	0	0	0	0
440	9319	Other sports activities	0	0	0	0	0	0	0	0	0	0	0	0
441	9321	Activities of amusement parks and theme parks	0	0	0	0	0	0	0	0	0	0	0	0
442	9329	Other amusement and recreation activities	0	0	0	0	0	0	0	0	0	0	0	0
443	9499	Activities of other membership organisations n.e.c.	0	0	0	0	0	0	0	0	1.67	0	0	0
444	9512	Repair of communication equipment	0	0	0	0	0	0	0	0	0	0	0	0
445	9521	Repair of consumer electronics	0	0	0	0	0	0	0	0	0	0	0	0
446	9601	Washing and (dry)cleaning of textile and fur products	0	0	0	0	0	0	0	0	4.9	3.3	0	0
447	9602	Hairdressing and other beauty treatment	0	0	0	0	0	0	0	0	0	0	0	0
448	9603	Funeral and related activities	0	0	0	0	0	0	0	0	1.93	0.14	0	0

			Pollution Prevention and Control (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
449	9604	Physical wellbeing activities	0	0	0	0	0	0	0	0	0.01	0	0	0
450	9700	Activities of households as employers of domestic personnel	0	0	0	0	0	0	0	0	0	0	0	0
451	9820	Undifferentiated service-producing activities of private households for own use	0	0	0	0	0	0	0	0	0	0	0	0
452	9900	Activities of extraterritorial organisations and bodies	0	0	0	0	0	0	0	0	0	0	0	0



3. GAR KPI stock - Turnover and CapEx based

GAR KPI stock - Turnover based

		Disclosure reference date 31/12/2025													
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	Proportion of total assets covered
% (compared to total covered assets in the denominator)															
GAR - Covered assets in both numerator and denominator															
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	55.06%	4.77%	2.69%	0.46%	0.69%	0.04%	0.01%	—%	—%	0.01%	—%	—%	—%	37.11%
2	Financial corporations	13.82%	1.31%	—%	0.14%	0.16%	0.04%	—%	—%	—%	—%	—%	—%	—%	6.15%
3	Credit institutions	13.22%	1.37%	—%	0.13%	0.15%	0.05%	—%	—%	—%	—%	—%	—%	—%	5.51%
4	Loans and advances	14.81%	1.57%	—%	0.14%	0.16%	0.05%	—%	—%	—%	—%	—%	—%	—%	4.53%
5	Debt securities, including UoP	5.70%	0.42%	—%	0.07%	0.07%	0.02%	—%	—%	—%	0.01%	—%	—%	—%	0.96%
6	Equity instruments	16.80%	0.86%	—%	0.05%	0.34%	0.11%	0.08%	—%	0.08%	—%	—%	—%	—%	0.01%
7	Other financial corporations	18.93%	0.84%	0.01%	0.18%	0.25%	0.02%	—%	—%	—%	—%	—%	—%	—%	0.64%
8	of which investment firms	18.65%	0.76%	0.01%	0.19%	0.26%	0.01%	—%	—%	—%	—%	—%	—%	—%	0.61%
9	Loans and advances	21.44%	0.73%	0.01%	0.23%	0.31%	—%	—%	—%	—%	—%	—%	—%	—%	0.50%
10	Debt securities, including UoP	8.24%	1.41%	—%	0.01%	0.04%	0.08%	—%	—%	—%	—%	—%	—%	—%	0.06%
11	Equity instruments	1.77%	0.17%	—%	0.01%	0.03%	0.01%	—%	—%	—%	—%	—%	—%	—%	0.05%
12	of which management companies	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
13	Loans and advances	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
14	Debt securities, including UoP	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
15	Equity instruments	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
16	of which insurance undertakings	23.79%	2.20%	—%	0.09%	0.09%	0.15%	0.04%	—%	0.04%	—%	—%	—%	—%	0.04%
17	Loans and advances	39.47%	3.65%	—%	0.15%	0.16%	0.25%	0.06%	—%	0.06%	—%	—%	—%	—%	0.02%
18	Debt securities, including UoP	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
19	Equity instruments	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.01%
20	Non-financial corporations (subject to NFRD disclosure obligations)	22.05%	10.47%	3.36%	1.68%	2.55%	0.14%	0.02%	—%	0.02%	0.02%	0.01%	—%	—%	9.71%
21	Loans and advances	21.52%	10.18%	3.39%	1.70%	2.18%	0.14%	0.02%	—%	0.02%	0.02%	0.01%	—%	—%	9.61%
22	Debt securities, including UoP	71.39%	37.15%	—%	—%	37.15%	—%	—%	—%	—%	—%	—%	—%	—%	0.10%
23	Equity instruments	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
24	Households	84.03%	3.24%	3.24%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	20.75%
25	of which loans collateralised by residential immovable property	100.00%	4.24%	4.24%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	15.86%
26	of which building renovation loans	100.00%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.53%
27	of which motor vehicle loans	100.00%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	1.04%
28	Local government financing	1.60%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.50%
29	Housing financing	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
30	Other local government financing	1.60%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.50%
31	Collateral obtained by taking possession: residential and commercial immovable properties	100.00%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.30%
32	Total GAR assets	26.34%	2.25%	1.27%	0.22%	0.33%	0.02%	—%	—%	—%	—%	—%	—%	—%	78.74%

		Disclosure reference date 31/12/2025												Proportion of total assets covered
		Circular Economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
% (compared to total covered assets in the denominator)				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
GAR - Covered assets in both numerator and denominator														
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0.09%	0.01%	—%	—%	0.05%	—%	—%	—%	0.12%	—%	—%	—%	37.11%
2	Financial corporations	0.05%	—%	—%	—%	0.02%	—%	—%	—%	—%	—%	—%	—%	6.15%
3	Credit institutions	0.06%	—%	—%	—%	0.02%	—%	—%	—%	—%	—%	—%	—%	5.51%
4	Loans and advances	0.06%	—%	—%	—%	0.02%	—%	—%	—%	0.01%	—%	—%	—%	4.53%
5	Debt securities, including UoP	0.04%	—%	—%	—%	0.01%	—%	—%	—%	—%	—%	—%	—%	0.96%
6	Equity instruments	0.03%	—%	—%	—%	—%	—%	—%	—%	0.04%	—%	—%	—%	0.01%
7	Other financial corporations	0.01%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.64%
8	of which investment firms	0.01%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.61%
9	Loans and advances	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.50%
10	Debt securities, including UoP	0.05%	—%	—%	—%	0.01%	—%	—%	—%	—%	—%	—%	—%	0.06%
11	Equity instruments	0.01%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.05%
12	of which management companies	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
13	Loans and advances	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
14	Debt securities, including UoP	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
15	Equity instruments	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
16	of which insurance undertakings	—%	—%	—%	—%	0.01%	—%	—%	—%	0.02%	—%	—%	—%	0.04%
17	Loans and advances	0.01%	—%	—%	—%	0.02%	—%	—%	—%	0.04%	—%	—%	—%	0.02%
18	Debt securities, including UoP	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
19	Equity instruments	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.01%
20	Non-financial corporations (subject to NFRD disclosure obligations)	0.30%	0.02%	—%	0.01%	0.19%	0.01%	—%	0.01%	0.44%	—%	—%	—%	9.71%
21	Loans and advances	0.30%	0.02%	—%	0.01%	0.19%	0.01%	—%	0.01%	0.45%	—%	—%	—%	9.61%
22	Debt securities, including UoP	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.10%
23	Equity instruments	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
24	Households	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	20.75%
25	of which loans collateralised by residential immovable property	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	15.86%
26	of which building renovation loans	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.53%
27	of which motor vehicle loans	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	1.04%
28	Local government financing	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.50%
29	Housing financing	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
30	Other local government financing	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.50%
31	Collateral obtained by taking possession: residential and commercial immovable properties	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.30%
32	Total GAR assets	0.04%	—%	—%	—%	0.03%	—%	—%	—%	0.05%	—%	—%	—%	78.74%

		Disclosure reference date 31/12/2025					Proportion of total assets covered
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
% (compared to total covered assets in the denominator)				Of which Use of Proceeds	Of which transitional	Of which enabling	
GAR - Covered assets in both numerator and denominator							
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	55.37%	4.79%	2.69%	0.46%	0.70%	37.11%
2	Financial corporations	13.94%	1.32%	—%	0.14%	0.16%	6.15%
3	Credit institutions	13.35%	1.37%	—%	0.13%	0.15%	5.51%
4	Loans and advances	14.96%	1.57%	—%	0.14%	0.16%	4.53%
5	Debt securities, including UoP	5.79%	0.42%	—%	0.07%	0.07%	0.96%
6	Equity instruments	16.99%	0.94%	—%	0.05%	0.42%	0.01%
7	Other financial corporations	18.97%	0.84%	0.01%	0.18%	0.26%	0.64%
8	of which investment firms	18.68%	0.76%	0.01%	0.19%	0.26%	0.61%
9	Loans and advances	21.46%	0.74%	0.01%	0.23%	0.31%	0.50%
10	Debt securities, including UoP	8.38%	1.41%	—%	0.01%	0.05%	0.06%
11	Equity instruments	1.80%	0.18%	—%	0.01%	0.03%	0.05%
12	of which management companies	—%	—%	—%	—%	—%	—%
13	Loans and advances	—%	—%	—%	—%	—%	—%
14	Debt securities, including UoP	—%	—%	—%	—%	—%	—%
15	Equity instruments	—%	—%	—%	—%	—%	—%
16	of which insurance undertakings	23.99%	2.24%	—%	0.09%	0.13%	0.04%
17	Loans and advances	39.80%	3.71%	—%	0.15%	0.22%	0.02%
18	Debt securities, including UoP	—%	—%	—%	—%	—%	—%
19	Equity instruments	—%	—%	—%	—%	—%	0.01%
20	Non-financial corporations (subject to NFRD disclosure obligations)	23.15%	10.53%	3.36%	1.68%	2.59%	9.71%
21	Loans and advances	22.63%	10.24%	3.39%	1.70%	2.22%	9.61%
22	Debt securities, including UoP	71.39%	37.15%	—%	—%	37.15%	0.10%
23	Equity instruments	—%	—%	—%	—%	—%	—%
24	Households	84.03%	3.24%	3.24%	—%	—%	20.75%
25	of which loans collateralised by residential immovable property	100.00%	4.24%	4.24%	—%	—%	15.86%
26	of which building renovation loans	100.00%	—%	—%	—%	—%	0.53%
27	of which motor vehicle loans	100.00%	—%	—%	—%	—%	1.04%
28	Local government financing	1.60%	—%	—%	—%	—%	0.50%
29	Housing financing	—%	—%	—%	—%	—%	—%
30	Other local government financing	1.60%	—%	—%	—%	—%	0.50%
31	Collateral obtained by taking possession: residential and commercial immovable properties	100.00%	—%	—%	—%	—%	0.30%
32	Total GAR assets	26.48%	2.26%	1.27%	0.22%	0.33%	78.74%

		Disclosure reference date 31/12/2024													
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)				Proportion of total assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
% (compared to total covered assets in the denominator)				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
GAR - Covered assets in both numerator and denominator															
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	70.50%	6.68%	5.88%	0.27%	0.28%	0.02%	—%	—%	—%	—%			51.09%	
2	Financial corporations	16.65%	1.20%	—%	0.14%	0.23%	0.05%	0.01%	—%	—%	—%			6.04%	
3	Credit institutions	16.81%	1.15%	—%	0.16%	0.11%	0.05%	0.01%	—%	—%	—%			5.48%	
4	Loans and advances	18.85%	1.29%	—%	0.17%	0.12%	0.06%	0.01%	—%	—%	—%			4.56%	
5	Debt securities, including UoP	6.62%	0.45%	—%	0.09%	0.07%	0.01%	—%	—%	—%	—%			0.92%	
6	Equity instruments	15.90%	1.67%		0.02%	0.14%	0.04%	0.02%		0.02%	—%			—%	
7	Other financial corporations	15.13%	1.72%	0.01%	0.03%	1.41%	0.02%	0.01%	—%	—%	—%			0.57%	
8	of which investment firms	14.65%	1.70%	0.01%	0.03%	1.48%	0.01%	—%	—%	—%	—%			0.54%	
9	Loans and advances	16.51%	1.93%	0.01%	0.03%	1.68%	0.01%	—%	—%	—%	—%			0.47%	
10	Debt securities, including UoP	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%			0.02%	
11	Equity instruments	1.50%	0.09%	—%		0.02%	0.01%	—%	—%		—%			0.05%	
12	of which management companies	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%			—%	
13	Loans and advances	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%			—%	
14	Debt securities, including UoP	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%			—%	
15	Equity instruments	—%	—%	—%		—%	—%	—%	—%		—%			—%	
16	of which insurance undertakings	24.45%	2.12%	—%	0.03%	0.06%	0.20%	0.05%	—%	0.02%	—%			0.03%	
17	Loans and advances	38.59%	3.35%	—%	0.05%	0.10%	0.32%	0.08%	—%	0.04%	—%			0.02%	
18	Debt securities, including UoP	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%			—%	
19	Equity instruments	—%	—%	—%		—%	—%	—%	—%		—%			0.01%	
20	Non-financial corporations (subject to NFRD disclosure obligations)	20.68%	7.72%	2.40%	1.80%	2.07%	0.16%	0.03%	—%	0.02%	0.01%			6.28%	
21	Loans and advances	20.01%	7.45%	2.44%	1.83%	1.71%	0.16%	0.03%	—%	0.02%	0.01%			6.18%	
22	Debt securities, including UoP	59.36%	23.27%	—%	0.02%	23.11%	—%	—%	—%	—%	—%			0.11%	
23	Equity instruments	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%			—%	
24	Households	88.39%	7.49%	7.49%	0.04%	—%	—%	—%	—%	—%	—%			38.14%	
25	of which loans collateralised by residential immovable property	100.00%	8.78%	8.78%	—%	—%	—%	—%	—%	—%	—%			32.32%	
26	of which building renovation loans	100.00%	—%	—%	—%	—%	—%	—%	—%	—%	—%			0.50%	
27	of which motor vehicle loans	100.00%	1.88%	1.88%	1.88%	—%	—%							0.89%	
28	Local government financing	0.08%	—%	—%	—%	—%	—%	—%	—%	—%	—%			0.62%	
29	Housing financing	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%			—%	
30	Other local government financing	0.08%	—%	—%	—%	—%	—%	—%	—%	—%	—%			0.62%	
31	Collateral obtained by taking possession: residential and commercial immovable properties	100.00%	—%	—%	—%	—%	—%	—%	—%	—%	—%			0.38%	
32	Total GAR assets	47.15%	4.42%	3.89%	0.18%	0.19%	0.02%	—%	—%	—%	—%			77.19%	

		Disclosure reference date 31/12/2024											Proportion of total assets covered
		Circular Economy (CE)			Pollution (PPC)				Biodiversity and Ecosystems (BIO)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Of which Use of Proceeds	
% (compared to total covered assets in the denominator)													
GAR - Covered assets in both numerator and denominator													
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0.01%			0.05%				0.08%				51.09%
2	Financial corporations	—%			—%				—%				6.04%
3	Credit institutions	—%			—%				—%				5.48%
4	Loans and advances	—%			—%				—%				4.56%
5	Debt securities, including UoP	—%			—%				—%				0.92%
6	Equity instruments	—%			—%				—%				—%
7	Other financial corporations	—%			—%				—%				0.57%
8	of which investment firms	—%			—%				—%				0.54%
9	Loans and advances	—%			—%				—%				0.47%
10	Debt securities, including UoP	—%			—%				—%				0.02%
11	Equity instruments	—%			—%				—%				0.05%
12	of which management companies	—%			—%				—%				—%
13	Loans and advances	—%			—%				—%				—%
14	Debt securities, including UoP	—%			—%				—%				—%
15	Equity instruments	—%			—%				—%				—%
16	of which insurance undertakings	—%			—%				—%				0.03%
17	Loans and advances	—%			—%				—%				0.02%
18	Debt securities, including UoP	—%			—%				—%				—%
19	Equity instruments	—%			—%				—%				0.01%
20	Non-financial corporations (subject to NFRD disclosure obligations)	0.08%			0.40%				0.61%				6.28%
21	Loans and advances	0.08%			0.19%				0.62%				6.18%
22	Debt securities, including UoP	—%			12.38%				—%				0.11%
23	Equity instruments	—%			—%				—%				—%
24	Households	—%			—%				—%				38.14%
25	of which loans collateralised by residential immovable property	—%			—%				—%				32.32%
26	of which building renovation loans	—%			—%				—%				0.50%
27	of which motor vehicle loans	—%			—%				—%				0.89%
28	Local government financing	—%			—%				—%				0.62%
29	Housing financing	—%			—%				—%				—%
30	Other local government financing	—%			—%				—%				0.62%
31	Collateral obtained by taking possession: residential and commercial immovable properties	—%			—%				—%				0.38%
32	Total GAR assets	0.01%			0.03%				0.05%				77.19%

		Disclosure reference date 31/12/2024					
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total assets covered	
		Of which Use of Proceeds	Of which transitional	Of which enabling			
% (compared to total covered assets in the denominator)							
GAR - Covered assets in both numerator and denominator							
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	70.66%	6.69%	5.88%	0.27%	0.28%	51.09%
2	Financial corporations	16.69%	1.21%	—%	0.14%	0.23%	6.04%
3	Credit institutions	16.85%	1.16%	—%	0.16%	0.11%	5.48%
4	Loans and advances	18.91%	1.30%	—%	0.17%	0.12%	4.56%
5	Debt securities, including UoP	6.63%	0.46%	—%	0.09%	0.07%	0.92%
6	Equity instruments	15.94%	1.69%		0.02%	0.16%	—%
7	Other financial corporations	15.15%	1.73%	0.01%	0.03%	1.41%	0.57%
8	of which investment firms	14.65%	1.71%	0.01%	0.03%	1.48%	0.54%
9	Loans and advances	16.52%	1.93%	0.01%	0.03%	1.68%	0.47%
10	Debt securities, including UoP	—%	—%	—%	—%	—%	0.02%
11	Equity instruments	1.51%	0.09%	—%		0.02%	0.05%
12	of which management companies	—%	—%	—%	—%	—%	—%
13	Loans and advances	—%	—%	—%	—%	—%	—%
14	Debt securities, including UoP	—%	—%	—%	—%	—%	—%
15	Equity instruments	—%	—%	—%		—%	—%
16	of which insurance undertakings	24.65%	2.17%	—%	0.03%	0.09%	0.03%
17	Loans and advances	38.90%	3.43%	—%	0.05%	0.14%	0.02%
18	Debt securities, including UoP	—%	—%	—%	—%	—%	—%
19	Equity instruments	—%	—%	—%		—%	0.01%
20	Non-financial corporations (subject to NFRD disclosure obligations)	21.94%	7.75%	2.40%	1.80%	2.09%	6.28%
21	Loans and advances	21.08%	7.49%	2.44%	1.83%	1.73%	6.18%
22	Debt securities, including UoP	71.74%	23.27%	—%	0.02%	23.11%	0.11%
23	Equity instruments	—%	—%	—%	—%	—%	—%
24	Households	88.39%	7.49%	7.49%	0.04%	—%	38.14%
25	of which loans collateralised by residential immovable property	100.00%	8.78%	8.78%	—%	—%	32.32%
26	of which building renovation loans	100.00%	—%	—%	—%	—%	0.50%
27	of which motor vehicle loans	100.00%	1.88%	1.88%	1.88%	—%	0.89%
28	Local government financing	0.08%	—%	—%	—%	—%	0.62%
29	Housing financing	—%	—%	—%	—%	—%	—%
30	Other local government financing	0.08%	—%	—%	—%	—%	0.62%
31	Collateral obtained by taking possession: residential and commercial immovable properties	100.00%	—%	—%	—%	—%	0.38%
32	Total GAR assets	47.26%	4.43%	3.89%	0.18%	0.19%	77.19%

GAR KPI stock - CapEx based

		Disclosure reference date 31/12/2025												
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	Proportion of total assets covered
%		(compared to total covered assets in the denominator)												
GAR - Covered assets in both numerator and denominator														
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	56.22%	5.99%	2.69%	0.50%	0.91%	0.14%	0.01%	—%	—%	0.01%	—%	—%	37.11%
2	Financial corporations	14.96%	1.76%	—%	0.17%	0.22%	0.06%	0.01%	—%	—%	—%	—%	—%	6.15%
3	Credit institutions	14.72%	1.88%	—%	0.16%	0.24%	0.07%	0.01%	—%	—%	—%	—%	—%	5.51%
4	Loans and advances	16.61%	2.17%	—%	0.18%	0.27%	0.08%	0.01%	—%	—%	—%	—%	—%	4.53%
5	Debt securities, including UoP	5.79%	0.50%	—%	0.07%	0.10%	0.03%	—%	—%	—%	0.01%	—%	—%	0.96%
6	Equity instruments	16.78%	0.97%	—%	0.06%	0.11%	0.10%	0.07%	—%	—%	—%	—%	—%	0.01%
7	Other financial corporations	17.02%	0.74%	0.01%	0.29%	0.10%	0.03%	—%	—%	—%	—%	—%	—%	0.64%
8	of which investment firms	16.56%	0.64%	0.01%	0.30%	0.10%	0.02%	—%	—%	—%	—%	—%	—%	0.61%
9	Loans and advances	18.85%	0.59%	0.01%	0.36%	0.11%	—%	—%	—%	—%	—%	—%	—%	0.50%
10	Debt securities, including UoP	8.31%	1.45%	—%	0.01%	0.05%	0.09%	0.01%	—%	0.01%	—%	—%	—%	0.06%
11	Equity instruments	2.31%	0.22%	—%	0.01%	0.04%	0.06%	—%	—%	—%	—%	—%	—%	0.05%
12	of which management companies	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
13	Loans and advances	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
14	Debt securities, including UoP	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
15	Equity instruments	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
16	of which insurance undertakings	25.07%	2.32%	—%	0.10%	0.13%	0.26%	0.04%	—%	0.04%	—%	—%	—%	0.04%
17	Loans and advances	41.59%	3.85%	—%	0.17%	0.22%	0.44%	0.06%	—%	0.06%	—%	—%	—%	0.02%
18	Debt securities, including UoP	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
19	Equity instruments	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.01%
20	Non-financial corporations (subject to NFRD disclosure obligations)	25.76%	14.87%	3.36%	1.78%	3.32%	0.49%	0.02%	—%	0.01%	0.02%	0.01%	—%	9.71%
21	Loans and advances	25.25%	14.61%	3.39%	1.80%	2.94%	0.50%	0.02%	—%	0.01%	0.02%	0.01%	—%	9.61%
22	Debt securities, including UoP	72.92%	38.68%	—%	—%	38.68%	—%	—%	—%	—%	—%	—%	—%	0.10%
23	Equity instruments	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
24	Households	84.03%	3.24%	3.24%	—%	—%	—%	—%	—%	—%	—%	—%	—%	20.75%
25	of which loans collateralised by residential immovable property	100.00%	4.24%	4.24%	—%	—%	—%	—%	—%	—%	—%	—%	—%	15.86%
26	of which building renovation loans	100.00%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.53%
27	of which motor vehicle loans	100.00%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	1.04%
28	Local government financing	1.60%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.50%
29	Housing financing	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
30	Other local government financing	1.60%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.50%
31	Collateral obtained by taking possession: residential and commercial immovable properties	100.00%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.30%
32	Total GAR assets	26.88%	2.82%	1.27%	0.23%	0.43%	0.07%	—%	—%	—%	—%	—%	—%	78.74%

		Disclosure reference date 31/12/2025												
		Circular Economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				Proportion of total assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Of which Use of Proceeds		Of which enabling		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Of which Use of Proceeds		Of which enabling		
% (compared to total covered assets in the denominator)														
GAR - Covered assets in both numerator and denominator														
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0.15%	0.02%	—%	—%	0.03%	—%	—%	—%	0.13%	—%	—%	—%	37.11%
2	Financial corporations	0.05%	—%	—%	—%	0.01%	—%	—%	—%	—%	—%	—%	—%	6.15%
3	Credit institutions	0.06%	—%	—%	—%	0.01%	—%	—%	—%	—%	—%	—%	—%	5.51%
4	Loans and advances	0.07%	—%	—%	—%	0.01%	—%	—%	—%	0.01%	—%	—%	—%	4.53%
5	Debt securities, including UoP	0.03%	—%	—%	—%	0.01%	—%	—%	—%	—%	—%	—%	—%	0.96%
6	Equity instruments	0.04%	—%	—%	—%	—%	—%	—%	—%	0.05%	—%	—%	—%	0.01%
7	Other financial corporations	0.01%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.64%
8	of which investment firms	0.01%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.61%
9	Loans and advances	0.01%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.50%
10	Debt securities, including UoP	0.01%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.06%
11	Equity instruments	0.01%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.05%
12	of which management companies	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
13	Loans and advances	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
14	Debt securities, including UoP	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
15	Equity instruments	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
16	of which insurance undertakings	0.01%	—%	—%	—%	0.01%	—%	—%	—%	0.02%	—%	—%	—%	0.04%
17	Loans and advances	0.02%	—%	—%	—%	0.02%	—%	—%	—%	0.04%	—%	—%	—%	0.02%
18	Debt securities, including UoP	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
19	Equity instruments	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.01%
20	Non-financial corporations (subject to NFRD disclosure obligations)	0.53%	0.06%	—%	—%	0.12%	0.02%	—%	0.01%	0.51%	—%	—%	—%	9.71%
21	Loans and advances	0.53%	0.06%	—%	—%	0.12%	0.02%	—%	0.01%	0.52%	—%	—%	—%	9.61%
22	Debt securities, including UoP	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.10%
23	Equity instruments	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
24	Households	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	20.75%
25	of which loans collateralised by residential immovable property	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	15.86%
26	of which building renovation loans	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.53%
27	of which motor vehicle loans	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	1.04%
28	Local government financing	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.50%
29	Housing financing	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
30	Other local government financing	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.50%
31	Collateral obtained by taking possession: residential and commercial immovable properties	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.30%
32	Total GAR assets	0.07%	0.01%	—%	—%	0.02%	—%	—%	—%	0.06%	—%	—%	—%	78.74%

		Disclosure reference date 31/12/2025					
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total assets covered	
		Of which Use of Proceeds	Of which transitional	Of which enabling			
% (compared to total covered assets in the denominator)							
GAR - Covered assets in both numerator and denominator							
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	56.68%	6.02%	2.69%	0.50%	0.91%	37.11%
2	Financial corporations	15.10%	1.77%	—%	0.17%	0.23%	6.15%
3	Credit institutions	14.87%	1.89%	—%	0.16%	0.24%	5.51%
4	Loans and advances	16.77%	2.18%	—%	0.18%	0.27%	4.53%
5	Debt securities, including UoP	5.87%	0.51%	—%	0.07%	0.10%	0.96%
6	Equity instruments	16.97%	1.04%	—%	0.06%	0.11%	0.01%
7	Other financial corporations	17.07%	0.74%	0.01%	0.29%	0.11%	0.64%
8	of which investment firms	16.59%	0.65%	0.01%	0.30%	0.10%	0.61%
9	Loans and advances	18.86%	0.59%	0.01%	0.36%	0.11%	0.50%
10	Debt securities, including UoP	8.42%	1.46%	—%	0.01%	0.06%	0.06%
11	Equity instruments	2.39%	0.23%	—%	0.01%	0.04%	0.05%
12	of which management companies	—%	—%	—%	—%	—%	—%
13	Loans and advances	—%	—%	—%	—%	—%	—%
14	Debt securities, including UoP	—%	—%	—%	—%	—%	—%
15	Equity instruments	—%	—%	—%	—%	—%	—%
16	of which insurance undertakings	25.38%	2.36%	—%	0.10%	0.17%	0.04%
17	Loans and advances	42.10%	3.92%	—%	0.17%	0.29%	0.02%
18	Debt securities, including UoP	—%	—%	—%	—%	—%	—%
19	Equity instruments	—%	—%	—%	—%	—%	0.01%
20	Non-financial corporations (subject to NFRD disclosure obligations)	27.43%	14.97%	3.36%	1.78%	3.34%	9.71%
21	Loans and advances	26.94%	14.71%	3.39%	1.80%	2.96%	9.61%
22	Debt securities, including UoP	72.92%	38.68%	—%	—%	38.68%	0.10%
23	Equity instruments	—%	—%	—%	—%	—%	—%
24	Households	84.03%	3.24%	3.24%	—%	—%	20.75%
25	of which loans collateralised by residential immovable property	100.00%	4.24%	4.24%	—%	—%	15.86%
26	of which building renovation loans	100.00%	—%	—%	—%	—%	0.53%
27	of which motor vehicle loans	100.00%	—%	—%	—%	—%	1.04%
28	Local government financing	1.60%	—%	—%	—%	—%	0.50%
29	Housing financing	—%	—%	—%	—%	—%	—%
30	Other local government financing	1.60%	—%	—%	—%	—%	0.50%
31	Collateral obtained by taking possession: residential and commercial immovable properties	100.00%	—%	—%	—%	—%	0.30%
32	Total GAR assets	27.10%	2.84%	1.27%	0.23%	0.43%	78.74%

		Disclosure reference date 31/12/2024												Proportion of total assets covered
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
% (compared to total covered assets in the denominator)				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
GAR - Covered assets in both numerator and denominator														
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	71.21%	7.06%	5.88%	0.30%	0.41%	0.05%	0.01%	—%	—%	—%			51.09%
2	Financial corporations	16.66%	1.40%	—%	0.19%	0.29%	0.04%	0.01%	—%	—%	—%			6.04%
3	Credit institutions	16.89%	1.39%	—%	0.21%	0.19%	0.04%	0.01%	—%	—%	—%			5.48%
4	Loans and advances	18.92%	1.55%	—%	0.23%	0.20%	0.05%	0.01%	—%	—%	—%			4.56%
5	Debt securities, including UoP	6.80%	0.58%	—%	0.12%	0.11%	0.03%	0.01%	—%	—%	—%			0.92%
6	Equity instruments	15.83%	1.76%		0.02%	0.07%	0.04%	0.02%		0.01%	—%			—%
7	Other financial corporations	14.47%	1.51%	0.01%	0.01%	1.32%	0.01%	—%	—%	—%	—%			0.57%
8	of which investment firms	13.88%	1.48%	0.01%	—%	1.38%	—%	—%	—%	—%	—%			0.54%
9	Loans and advances	15.18%	1.68%	0.01%	—%	1.56%	—%	—%	—%	—%	—%			0.47%
10	Debt securities, including UoP	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%			0.02%
11	Equity instruments	6.33%	0.12%		—%	0.04%	0.01%	—%		—%	—%			0.05%
12	of which management companies	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%			—%
13	Loans and advances	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%			—%
14	Debt securities, including UoP	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%			—%
15	Equity instruments	—%	—%		—%	—%	—%	—%		—%	—%			—%
16	of which insurance undertakings	25.83%	2.10%	—%	0.03%	0.11%	0.20%	0.05%	—%	0.02%	—%			0.03%
17	Loans and advances	40.77%	3.32%	—%	0.05%	0.17%	0.31%	0.08%	—%	0.03%	—%			0.02%
18	Debt securities, including UoP	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%			—%
19	Equity instruments	—%	—%		—%	—%	—%	—%		—%	—%			0.01%
20	Non-financial corporations (subject to NFRD disclosure obligations)	26.45%	10.60%	2.40%	1.95%	3.04%	0.37%	0.04%	—%	0.01%	0.02%			6.28%
21	Loans and advances	25.87%	10.32%	2.44%	1.99%	2.62%	0.38%	0.04%	—%	0.01%	0.02%			6.18%
22	Debt securities, including UoP	59.89%	27.05%	—%	—%	27.02%	—%	—%	—%	—%	—%			0.11%
23	Equity instruments	—%	—%		—%	—%	—%	—%		—%	—%			—%
24	Households	88.39%	7.49%	7.49%	0.04%	—%	—%	—%	—%	—%	—%			38.14%
25	of which loans collateralised by residential immovable property	100.00%	8.78%	8.78%	—%	—%	—%	—%	—%	—%	—%			32.32%
26	of which building renovation loans	100.00%	—%	—%	—%	—%	—%	—%	—%	—%	—%			0.50%
27	of which motor vehicle loans	100.00%	1.88%	1.88%	1.88%	—%	—%	—%	—%	—%	—%			0.89%
28	Local government financing	0.08%	—%	—%	—%	—%	—%	—%	—%	—%	—%			0.62%
29	Housing financing	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%			—%
30	Other local government financing	0.08%	—%	—%	—%	—%	—%	—%	—%	—%	—%			0.62%
31	Collateral obtained by taking possession: residential and commercial immovable properties	100.00%	—%	—%	—%	—%	—%	—%	—%	—%	—%			0.38%
32	Total GAR assets	47.62%	4.67%	3.89%	0.20%	0.27%	0.03%	—%	—%	—%	—%			77.19%

		Disclosure reference date 31/12/2024											Proportion of total assets covered	
		Circular Economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Of which enabling
% (compared to total covered assets in the denominator)														
GAR - Covered assets in both numerator and denominator														
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0.03%				0.02%					0.08%			51.09%
2	Financial corporations	—%				—%					—%			6.04%
3	Credit institutions	—%				—%					—%			5.48%
4	Loans and advances	—%				—%					—%			4.56%
5	Debt securities, including UoP	—%				—%					—%			0.92%
6	Equity instruments	—%				—%					—%			—%
7	Other financial corporations	—%				—%					—%			0.57%
8	of which investment firms	—%				—%					—%			0.54%
9	Loans and advances	—%				—%					—%			0.47%
10	Debt securities, including UoP	—%				—%					—%			0.02%
11	Equity instruments	—%				—%					—%			0.05%
12	of which management companies	—%				—%					—%			—%
13	Loans and advances	—%				—%					—%			—%
14	Debt securities, including UoP	—%				—%					—%			—%
15	Equity instruments	—%				—%					—%			—%
16	of which insurance undertakings	—%				—%					—%			0.03%
17	Loans and advances	—%				—%					—%			0.02%
18	Debt securities, including UoP	—%				—%					—%			—%
19	Equity instruments	—%				—%					—%			0.01%
20	Non-financial corporations (subject to NFRD disclosure obligations)	0.28%				0.19%					0.66%			6.28%
21	Loans and advances	0.28%				0.16%					0.67%			6.18%
22	Debt securities, including UoP	—%				1.70%					—%			0.11%
23	Equity instruments	—%				—%					—%			—%
24	Households	—%				—%					—%			38.14%
25	of which loans collateralised by residential immovable property	—%				—%					—%			32.32%
26	of which building renovation loans	—%				—%					—%			0.50%
27	of which motor vehicle loans	—%				—%					—%			0.89%
28	Local government financing	—%				—%					—%			0.62%
29	Housing financing	—%				—%					—%			—%
30	Other local government financing	—%				—%					—%			0.62%
31	Collateral obtained by taking possession: residential and commercial immovable properties	—%				—%					—%			0.38%
32	Total GAR assets	0.02%				0.02%					0.05%			77.19%

		Disclosure reference date 31/12/2024					
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total assets covered	
		Of which Use of Proceeds	Of which transitional	Of which enabling			
% (compared to total covered assets in the denominator)							
GAR - Covered assets in both numerator and denominator							
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	71.40%	7.06%	5.88%	0.30%	0.41%	51.09%
2	Financial corporations	16.70%	1.41%	—%	0.19%	0.29%	6.04%
3	Credit institutions	16.93%	1.40%	—%	0.21%	0.19%	5.48%
4	Loans and advances	18.97%	1.56%	—%	0.23%	0.20%	4.56%
5	Debt securities, including UoP	6.83%	0.59%	—%	0.12%	0.11%	0.92%
6	Equity instruments	15.87%	1.78%		0.02%	0.08%	—%
7	Other financial corporations	14.49%	1.52%	0.01%	0.01%	1.32%	0.57%
8	of which investment firms	13.89%	1.49%	0.01%	—%	1.38%	0.54%
9	Loans and advances	15.19%	1.68%	0.01%	—%	1.57%	0.47%
10	Debt securities, including UoP	—%	—%	—%	—%	—%	0.02%
11	Equity instruments	6.34%	0.12%		—%	0.04%	0.05%
12	of which management companies	—%	—%	—%	—%	—%	—%
13	Loans and advances	—%	—%	—%	—%	—%	—%
14	Debt securities, including UoP	—%	—%	—%	—%	—%	—%
15	Equity instruments	—%	—%		—%	—%	—%
16	of which insurance undertakings	26.03%	2.16%	—%	0.03%	0.13%	0.03%
17	Loans and advances	41.08%	3.40%	—%	0.05%	0.20%	0.02%
18	Debt securities, including UoP	—%	—%	—%	—%	—%	—%
19	Equity instruments	—%	—%		—%	—%	0.01%
20	Non-financial corporations (subject to NFRD disclosure obligations)	27.97%	10.64%	2.40%	1.95%	3.04%	6.28%
21	Loans and advances	27.39%	10.36%	2.44%	1.99%	2.63%	6.18%
22	Debt securities, including UoP	61.59%	27.05%	—%	—%	27.02%	0.11%
23	Equity instruments	—%	—%	—%	—%	—%	—%
24	Households	88.39%	7.49%	7.49%	0.04%	—%	38.14%
25	of which loans collateralised by residential immovable property	100.00%	8.78%	8.78%	—%	—%	32.32%
26	of which building renovation loans	100.00%	—%	—%	—%	—%	0.50%
27	of which motor vehicle loans	100.00%	1.88%	1.88%	1.88%	—%	0.89%
28	Local government financing	0.08%	—%	—%	—%	—%	0.62%
29	Housing financing	—%	—%	—%	—%	—%	—%
30	Other local government financing	0.08%	—%	—%	—%	—%	0.62%
31	Collateral obtained by taking possession: residential and commercial immovable properties	100.00%	—%	—%	—%	—%	0.38%
32	Total GAR assets	47.75%	4.68%	3.89%	0.20%	0.27%	77.19%



4. GAR KPI flow - Turnover and CapEx based

GAR KPI flow - Turnover based

		Disclosure reference date 31/12/2025													
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)				Proportion of total assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Of which UoP			Of which transitional	Of which enabling	Of which UoP			Of which enabling	Of which UoP			Of which enabling	
% (compared to flow of eligible assets)															
GAR - Covered assets in both numerator and denominator															
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	33.06%	3.92%	2.31%	0.19%	0.52%	0.08%	0.01%	—%	0.01%	0.01%	—%	—%	—%	46.41%
2	Financial corporations	14.42%	1.54%	—%	0.13%	0.16%	0.05%	0.01%	—%	—%	—%	—%	—%	—%	14.62%
3	Credit institutions	14.35%	1.59%	—%	0.13%	0.16%	0.05%	0.01%	—%	—%	—%	—%	—%	—%	14.10%
4	Loans and advances	14.35%	1.59%	—%	0.13%	0.16%	0.05%	0.01%	—%	—%	—%	—%	—%	—%	14.10%
5	Debt securities, including UoP	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
6	Equity instruments	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
7	Other financial corporations	16.18%	0.07%	—%	—%	0.01%	—%	—%	—%	—%	—%	—%	—%	—%	0.52%
8	of which investment firms	16.19%	0.07%	—%	—%	0.01%	—%	—%	—%	—%	—%	—%	—%	—%	0.52%
9	Loans and advances	16.19%	0.07%	—%	—%	0.01%	—%	—%	—%	—%	—%	—%	—%	—%	0.52%
10	Debt securities, including UoP	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
11	Equity instruments	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
12	of which management companies	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
13	Loans and advances	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
14	Debt securities, including UoP	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
15	Equity instruments	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
16	of which insurance undertakings	0.01%	—%	—%	—%	—%	10.86%	—%	—%	—%	—%	—%	—%	—%	—%
17	Loans and advances	0.01%	—%	—%	—%	—%	10.86%	—%	—%	—%	—%	—%	—%	—%	—%
18	Debt securities, including UoP	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
19	Equity instruments	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
20	Non-financial corporations (subject to NFRD disclosure obligations)	14.62%	5.92%	2.97%	0.40%	1.23%	0.16%	0.02%	—%	0.02%	0.02%	—%	—%	—%	17.75%
21	Loans and advances	14.62%	5.92%	2.97%	0.40%	1.23%	0.16%	0.02%	—%	0.02%	0.02%	—%	—%	—%	17.75%
22	Debt securities, including UoP	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
23	Equity instruments	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
24	Households	77.04%	3.94%	3.94%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	13.77%
25	of which loans collateralised by residential immovable property	100.00%	6.09%	6.09%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	8.91%
26	of which building renovation loans	100.00%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.22%
27	of which motor vehicle loans	100.00%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	1.48%
28	Local government financing	10.65%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.27%
29	Housing financing	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
30	Other local government financing	10.65%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.27%
31	Collateral obtained by taking possession: residential and commercial immovable properties	100.00%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.03%
32	Total GAR assets	18.80%	2.22%	1.31%	0.11%	0.29%	0.04%	0.01%	—%	—%	—%	—%	—%	—%	81.77%

		Disclosure reference date 31/12/2025												Proportion of total assets covered
		Circular Economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)						
Of which UoP	Of which enabling									Of which UoP	Of which enabling	Of which UoP	Of which enabling	
% (compared to flow of eligible assets)														
GAR - Covered assets in both numerator and denominator														
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	0.15%	0.01%	—%	0.01%	0.15%	0.01%	—%	0.01%	0.10%	—%	—%	—%	46.41%
2	Financial corporations	0.06%	—%	—%	—%	0.02%	—%	—%	—%	—%	—%	—%	—%	14.62%
3	Credit institutions	0.07%	—%	—%	—%	0.02%	—%	—%	—%	0.01%	—%	—%	—%	14.10%
4	Loans and advances	0.07%	—%	—%	—%	0.02%	—%	—%	—%	0.01%	—%	—%	—%	14.10%
5	Debt securities, including UoP	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
6	Equity instruments	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
7	Other financial corporations	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.52%
8	of which investment firms	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.52%
9	Loans and advances	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.52%
10	Debt securities, including UoP	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
11	Equity instruments	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
12	of which management companies	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
13	Loans and advances	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
14	Debt securities, including UoP	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
15	Equity instruments	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
16	of which insurance undertakings	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
17	Loans and advances	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
18	Debt securities, including UoP	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
19	Equity instruments	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
20	Non-financial corporations (subject to NFRD disclosure obligations)	0.33%	0.03%	—%	0.02%	0.36%	0.02%	—%	0.02%	0.26%	—%	—%	—%	17.75%
21	Loans and advances	0.33%	0.03%	—%	0.02%	0.36%	0.02%	—%	0.02%	0.26%	—%	—%	—%	17.75%
22	Debt securities, including UoP	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
23	Equity instruments	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
24	Households	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	13.77%
25	of which loans collateralised by residential immovable property	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	8.91%
26	of which building renovation loans	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.22%
27	of which motor vehicle loans	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	1.48%
28	Local government financing	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.27%
29	Housing financing	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
30	Other local government financing	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.27%
31	Collateral obtained by taking possession: residential and commercial immovable properties	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.03%
32	Total GAR assets	0.08%	0.01%	—%	—%	0.08%	0.01%	—%	0.01%	0.06%	—%	—%	—%	81.77%

		Disclosure reference date 31/12/2025					Proportion of total assets covered
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
% (compared to flow of eligible assets)				Of which Use of Proceeds	Of which transitional	Of which enabling	
GAR - Covered assets in both numerator and denominator							
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	33.54%	3.95%	2.31%	0.19%	0.54%	46.41%
2	Financial corporations	14.56%	1.54%	—%	0.13%	0.16%	14.62%
3	Credit institutions	14.50%	1.60%	—%	0.13%	0.16%	14.10%
4	Loans and advances	14.50%	1.60%	—%	0.13%	0.16%	14.10%
5	Debt securities, including UoP	—%	—%	—%	—%	—%	—%
6	Equity instruments	—%	—%	—%	—%	—%	—%
7	Other financial corporations	16.19%	0.07%	—%	—%	0.01%	0.52%
8	of which investment firms	16.19%	0.07%	—%	—%	0.01%	0.52%
9	Loans and advances	16.19%	0.07%	—%	—%	0.01%	0.52%
10	Debt securities, including UoP	—%	—%	—%	—%	—%	—%
11	Equity instruments	—%	—%	—%	—%	—%	—%
12	of which management companies	—%	—%	—%	—%	—%	—%
13	Loans and advances	—%	—%	—%	—%	—%	—%
14	Debt securities, including UoP	—%	—%	—%	—%	—%	—%
15	Equity instruments	—%	—%	—%	—%	—%	—%
16	of which insurance undertakings	10.87%	—%	—%	—%	—%	—%
17	Loans and advances	10.87%	—%	—%	—%	—%	—%
18	Debt securities, including UoP	—%	—%	—%	—%	—%	—%
19	Equity instruments	—%	—%	—%	—%	—%	—%
20	Non-financial corporations (subject to NFRD disclosure obligations)	15.76%	6.00%	2.97%	0.40%	1.29%	17.75%
21	Loans and advances	15.76%	6.00%	2.97%	0.40%	1.29%	17.75%
22	Debt securities, including UoP	—%	—%	—%	—%	—%	—%
23	Equity instruments	—%	—%	—%	—%	—%	—%
24	Households	77.04%	3.94%	3.94%	—%	—%	13.77%
25	of which loans collateralised by residential immovable property	100.00%	6.09%	6.09%	—%	—%	8.91%
26	of which building renovation loans	100.00%	—%	—%	—%	—%	0.22%
27	of which motor vehicle loans	100.00%	—%	—%	—%	—%	1.48%
28	Local government financing	10.65%	—%	—%	—%	—%	0.27%
29	Housing financing	—%	—%	—%	—%	—%	—%
30	Other local government financing	10.65%	—%	—%	—%	—%	0.27%
31	Collateral obtained by taking possession: residential and commercial immovable properties	100.00%	—%	—%	—%	—%	0.03%
32	Total GAR assets	19.07%	2.24%	1.31%	0.11%	0.31%	81.77%

Consolidated Non-Financial Disclosures and Sustainability Disclosures Report

		Disclosure reference date 31/12/2024										Proportion of total assets covered			
		Circular Economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
% (compared to flow of eligible assets)				Of which UoP	Of which enabling			Of which UoP	Of which enabling			Of which UoP	Of which enabling		
GAR - Covered assets in both numerator and denominator															
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	0.02%				0.08%					0.02%				50.17%
2	Financial corporations	—%				—%					—%				15.21%
3	Credit institutions	—%				—%					—%				14.70%
4	Loans and advances	—%				—%					—%				14.63%
5	Debt securities, including UoP	—%				—%					—%				0.08%
6	Equity instruments	—%				—%					—%				—%
7	Other financial corporations	—%				—%					—%				0.50%
8	of which investment firms	—%				—%					—%				0.50%
9	Loans and advances	—%				—%					—%				0.50%
10	Debt securities, including UoP	—%				—%					—%				—%
11	Equity instruments	—%				—%					—%				—%
12	of which management companies	—%				—%					—%				—%
13	Loans and advances	—%				—%					—%				—%
14	Debt securities, including UoP	—%				—%					—%				—%
15	Equity instruments	—%				—%					—%				—%
16	of which insurance undertakings	—%				—%					—%				—%
17	Loans and advances	—%				—%					—%				—%
18	Debt securities, including UoP	—%				—%					—%				—%
19	Equity instruments	—%				—%					—%				—%
20	Non-financial corporations (subject to NFRD disclosure obligations)	0.09%				0.34%					0.10%				11.26%
21	Loans and advances	0.09%				0.34%					0.10%				11.26%
22	Debt securities, including UoP	—%				—%					—%				—%
23	Equity instruments	—%				—%					—%				—%
24	Households	—%				—%					—%				23.46%
25	of which loans collateralised by residential immovable property	—%				—%					—%				17.26%
26	of which building renovation loans	—%				—%					—%				0.12%
27	of which motor vehicle loans	—%				—%					—%				1.33%
28	Local government financing	—%				—%					—%				0.24%
29	Housing financing	—%				—%					—%				—%
30	Other local government financing	—%				—%					—%				0.24%
31	Collateral obtained by taking possession: residential and commercial immovable properties	—%				—%					—%				0.03%
32	Total GAR assets	0.01%				0.05%					0.01%				82.05%

		Disclosure reference date 31/12/2024					Proportion of total assets covered
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
% (compared to flow of eligible assets)				Of which Use of Proceeds	Of which transitional	Of which enabling	
GAR - Covered assets in both numerator and denominator							
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	47.30%	5.86%	4.11%	0.62%	0.52%	50.17%
2	Financial corporations	16.65%	1.23%	—%	0.12%	0.10%	15.21%
3	Credit institutions	17.01%	1.27%	—%	0.12%	0.10%	14.70%
4	Loans and advances	17.10%	1.27%	—%	0.12%	0.10%	14.63%
5	Debt securities, including UoP	—%	—%	—%	—%	—%	0.08%
6	Equity instruments	—%	—%		—%	—%	—%
7	Other financial corporations	6.16%	0.06%	0.01%	—%	0.01%	0.50%
8	of which investment firms	6.17%	0.06%	0.01%	—%	0.01%	0.50%
9	Loans and advances	6.17%	0.06%	0.01%	—%	0.01%	0.50%
10	Debt securities, including UoP	—%	—%	—%	—%	—%	—%
11	Equity instruments	—%	—%		—%	—%	—%
12	of which management companies	—%	—%	—%	—%	—%	—%
13	Loans and advances	—%	—%	—%	—%	—%	—%
14	Debt securities, including UoP	—%	—%	—%	—%	—%	—%
15	Equity instruments	—%	—%		—%	—%	—%
16	of which insurance undertakings	0.45%	0.04%	—%	—%	—%	—%
17	Loans and advances	0.45%	0.04%	—%	—%	—%	—%
18	Debt securities, including UoP	—%	—%	—%	—%	—%	—%
19	Equity instruments	—%	—%		—%	—%	—%
20	Non-financial corporations (subject to NFRD disclosure obligations)	22.11%	10.67%	4.51%	2.41%	2.17%	11.26%
21	Loans and advances	22.11%	10.67%	4.51%	2.41%	2.17%	11.26%
22	Debt securities, including UoP	—%	—%	—%	—%	—%	—%
23	Equity instruments	—%	—%	—%	—%	—%	—%
24	Households	79.76%	6.62%	6.62%	0.09%	—%	23.46%
25	of which loans collateralised by residential immovable property	100.00%	8.87%	8.87%	—%	—%	17.26%
26	of which building renovation loans	100.00%	—%	—%	—%	—%	0.12%
27	of which motor vehicle loans	100.00%	1.65%	1.65%	1.65%	—%	1.33%
28	Local government financing	—%	—%	—%	—%	—%	0.24%
29	Housing financing	—%	—%	—%	—%	—%	—%
30	Other local government financing	—%	—%	—%	—%	—%	0.24%
31	Collateral obtained by taking possession: residential and commercial immovable properties	100.00%	—%	—%	—%	—%	0.03%
32	Total GAR assets	28.96%	3.59%	2.51%	0.38%	0.32%	82.05%

GAR KPI flow - CapEx based

		Disclosure reference date 31/12/2025														
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
% (compared to flow of eligible assets)				Of which UoP	Of which transitional	Of which enabling			Of which UoP	Of which enabling			Of which UoP	Of which enabling		
GAR - Covered assets in both numerator and denominator																
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	34.91%	5.35%	2.31%	0.22%	0.68%	0.29%	0.01%	—%	—%	0.01%	—%	—%	—%	46.41%	
2	Financial corporations	16.37%	2.16%	—%	0.15%	0.25%	0.07%	0.01%	—%	—%	—%	—%	—%	—%	14.62%	
3	Credit institutions	16.37%	2.23%	—%	0.16%	0.26%	0.08%	0.01%	—%	—%	—%	—%	—%	—%	14.10%	
4	Loans and advances	16.37%	2.23%	—%	0.16%	0.26%	0.08%	0.01%	—%	—%	—%	—%	—%	—%	14.10%	
5	Debt securities, including UoP	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	
6	Equity instruments	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	
7	Other financial corporations	16.24%	0.09%	—%	—%	0.02%	—%	—%	—%	—%	—%	—%	—%	—%	0.52%	
8	of which investment firms	16.25%	0.09%	—%	—%	0.02%	—%	—%	—%	—%	—%	—%	—%	—%	0.52%	
9	Loans and advances	16.25%	0.09%	—%	—%	0.02%	—%	—%	—%	—%	—%	—%	—%	—%	0.52%	
10	Debt securities, including UoP	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	
11	Equity instruments	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	
12	of which management companies	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	
13	Loans and advances	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	
14	Debt securities, including UoP	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	
15	Equity instruments	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	
16	of which insurance undertakings	0.01%	—%	—%	—%	—%	10.86%	—%	—%	—%	—%	—%	—%	—%	—%	
17	Loans and advances	0.01%	—%	—%	—%	—%	10.86%	—%	—%	—%	—%	—%	—%	—%	—%	
18	Debt securities, including UoP	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	
19	Equity instruments	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	
20	Non-financial corporations (subject to NFRD disclosure obligations)	17.87%	9.15%	2.97%	0.45%	1.58%	0.69%	0.02%	—%	0.01%	0.01%	—%	—%	—%	17.75%	
21	Loans and advances	17.87%	9.15%	2.97%	0.45%	1.58%	0.69%	0.02%	—%	0.01%	0.01%	—%	—%	—%	17.75%	
22	Debt securities, including UoP	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	
23	Equity instruments	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	
24	Households	77.04%	3.94%	3.94%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	13.77%	
25	of which loans collateralised by residential immovable property	100.00%	6.09%	6.09%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	8.91%	
26	of which building renovation loans	100.00%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.22%	
27	of which motor vehicle loans	100.00%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	1.48%	
28	Local government financing	10.65%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.27%	
29	Housing financing	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	
30	Other local government financing	10.65%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.27%	
31	Collateral obtained by taking possession: residential and commercial immovable properties	100.00%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.03%	
32	Total GAR assets	19.85%	3.03%	1.31%	0.12%	0.39%	0.16%	0.01%	—%	—%	—%	—%	—%	—%	81.77%	

		Disclosure reference date 31/12/2025												Proportion of total assets covered
		Circular Economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)								
Of which UoP	Of which enabling							Of which UoP	Of which enabling	Of which UoP	Of which enabling			
% (compared to flow of eligible assets)														
GAR - Covered assets in both numerator and denominator														
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0.20%	0.02%	—%	—%	0.09%	0.01%	—%	0.01%	0.11%	—%	—%	—%	46.41%
2	Financial corporations	0.07%	—%	—%	—%	0.01%	—%	—%	—%	—%	—%	—%	—%	14.62%
3	Credit institutions	0.07%	—%	—%	—%	0.01%	—%	—%	—%	0.01%	—%	—%	—%	14.10%
4	Loans and advances	0.07%	—%	—%	—%	0.01%	—%	—%	—%	0.01%	—%	—%	—%	14.10%
5	Debt securities, including UoP	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
6	Equity instruments	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
7	Other financial corporations	0.01%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.52%
8	of which investment firms	0.01%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.52%
9	Loans and advances	0.01%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.52%
10	Debt securities, including UoP	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
11	Equity instruments	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
12	of which management companies	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
13	Loans and advances	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
14	Debt securities, including UoP	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
15	Equity instruments	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
16	of which insurance undertakings	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
17	Loans and advances	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
18	Debt securities, including UoP	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
19	Equity instruments	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
20	Non-financial corporations (subject to NFRD disclosure obligations)	0.47%	0.05%	—%	—%	0.23%	0.02%	—%	0.02%	0.30%	—%	—%	—%	17.75%
21	Loans and advances	0.47%	0.05%	—%	—%	0.23%	0.02%	—%	0.02%	0.30%	—%	—%	—%	17.75%
22	Debt securities, including UoP	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
23	Equity instruments	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
24	Households	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	13.77%
25	of which loans collateralised by residential immovable property	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	8.91%
26	of which building renovation loans	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.22%
27	of which motor vehicle loans	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	1.48%
28	Local government financing	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.27%
29	Housing financing	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%
30	Other local government financing	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.27%
31	Collateral obtained by taking possession: residential and commercial immovable properties	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	—%	0.03%
32	Total GAR assets	0.11%	0.01%	—%	—%	0.05%	0.01%	—%	—%	0.07%	—%	—%	—%	81.77%

		Disclosure reference date 31/12/2025					
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total assets covered	
		Of which Use of Proceeds	Of which transitional	Of which enabling			
% (compared to flow of eligible assets)							
GAR - Covered assets in both numerator and denominator							
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	35.61%	5.39%	2.31%	0.22%	0.70%	46.41%
2	Financial corporations	16.52%	2.17%	—%	0.15%	0.25%	14.62%
3	Credit institutions	16.53%	2.24%	—%	0.16%	0.26%	14.10%
4	Loans and advances	16.53%	2.24%	—%	0.16%	0.26%	14.10%
5	Debt securities, including UoP	—%	—%	—%	—%	—%	—%
6	Equity instruments	—%	—%	—%	—%	—%	—%
7	Other financial corporations	16.27%	0.09%	—%	—%	0.02%	0.52%
8	of which investment firms	16.27%	0.09%	—%	—%	0.02%	0.52%
9	Loans and advances	16.27%	0.09%	—%	—%	0.02%	0.52%
10	Debt securities, including UoP	—%	—%	—%	—%	—%	—%
11	Equity instruments	—%	—%	—%	—%	—%	—%
12	of which management companies	—%	—%	—%	—%	—%	—%
13	Loans and advances	—%	—%	—%	—%	—%	—%
14	Debt securities, including UoP	—%	—%	—%	—%	—%	—%
15	Equity instruments	—%	—%	—%	—%	—%	—%
16	of which insurance undertakings	10.87%	—%	—%	—%	—%	—%
17	Loans and advances	10.87%	—%	—%	—%	—%	—%
18	Debt securities, including UoP	—%	—%	—%	—%	—%	—%
19	Equity instruments	—%	—%	—%	—%	—%	—%
20	Non-financial corporations (subject to NFRD disclosure obligations)	19.57%	9.25%	2.97%	0.45%	1.61%	17.75%
21	Loans and advances	19.57%	9.25%	2.97%	0.45%	1.61%	17.75%
22	Debt securities, including UoP	—%	—%	—%	—%	—%	—%
23	Equity instruments	—%	—%	—%	—%	—%	—%
24	Households	77.04%	3.94%	3.94%	—%	—%	13.77%
25	of which loans collateralised by residential immovable property	100.00%	6.09%	6.09%	—%	—%	8.91%
26	of which building renovation loans	100.00%	—%	—%	—%	—%	0.22%
27	of which motor vehicle loans	100.00%	—%	—%	—%	—%	1.48%
28	Local government financing	10.65%	—%	—%	—%	—%	0.27%
29	Housing financing	—%	—%	—%	—%	—%	—%
30	Other local government financing	10.65%	—%	—%	—%	—%	0.27%
31	Collateral obtained by taking possession: residential and commercial immovable properties	100.00%	—%	—%	—%	—%	0.03%
32	Total GAR assets	20.25%	3.06%	1.31%	0.12%	0.39%	81.77%

Consolidated Non-Financial Disclosures and Sustainability Disclosures Report

		Disclosure reference date 31/12/2024										Proportion of total assets covered		
		Circular Economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
	Of which UoP	Of which enabling		Of which UoP		Of which enabling		Of which UoP		Of which enabling				
% (compared to flow of eligible assets)														
GAR - Covered assets in both numerator and denominator														
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	0.07%			0.06%				0.02%			50.17%		
2	Financial corporations	—%			—%				—%			15.21%		
3	Credit institutions	—%			—%				—%			14.70%		
4	Loans and advances	—%			—%				—%			14.63%		
5	Debt securities, including UoP	—%			—%				—%			0.08%		
6	Equity instruments	—%			—%				—%			—%		
7	Other financial corporations	—%			—%				—%			0.50%		
8	of which investment firms	—%			—%				—%			0.50%		
9	Loans and advances	—%			—%				—%			0.50%		
10	Debt securities, including UoP	—%			—%				—%			—%		
11	Equity instruments	—%			—%				—%			—%		
12	of which management companies	—%			—%				—%			—%		
13	Loans and advances	—%			—%				—%			—%		
14	Debt securities, including UoP	—%			—%				—%			—%		
15	Equity instruments	—%			—%				—%			—%		
16	of which insurance undertakings	—%			—%				—%			—%		
17	Loans and advances	—%			—%				—%			—%		
18	Debt securities, including UoP	—%			—%				—%			—%		
19	Equity instruments	—%			—%				—%			—%		
20	Non-financial corporations (subject to NFRD disclosure obligations)	0.31%			0.29%				0.10%			11.26%		
21	Loans and advances	0.31%			0.29%				0.10%			11.26%		
22	Debt securities, including UoP	—%			—%				—%			—%		
23	Equity instruments	—%			—%				—%			—%		
24	Households	—%			—%				—%			23.46%		
25	of which loans collateralised by residential immovable property	—%			—%				—%			17.26%		
26	of which building renovation loans	—%			—%				—%			0.12%		
27	of which motor vehicle loans	—%			—%				—%			1.33%		
28	Local government financing	—%			—%				—%			0.24%		
29	Housing financing	—%			—%				—%			—%		
30	Other local government financing	—%			—%				—%			0.24%		
31	Collateral obtained by taking possession: residential and commercial immovable properties	—%			—%				—%			0.03%		
32	Total GAR assets	0.04%			0.04%				0.01%			82.05%		

		Disclosure reference date 31/12/2024					Proportion of total assets covered
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
% (compared to flow of eligible assets)				Of which Use of Proceeds	Of which transitional	Of which enabling	
GAR - Covered assets in both numerator and denominator							
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	48.02%	6.12%	4.11%	0.67%	0.56%	50.17%
2	Financial corporations	16.55%	1.40%	—%	0.14%	0.16%	15.21%
3	Credit institutions	16.91%	1.44%	—%	0.14%	0.17%	14.70%
4	Loans and advances	17.00%	1.45%	—%	0.14%	0.17%	14.63%
5	Debt securities, including UoP	—%	—%	—%	—%	—%	0.08%
6	Equity instruments	—%	—%		—%	—%	—%
7	Other financial corporations	6.21%	0.08%	0.01%	—%	0.02%	0.50%
8	of which investment firms	6.21%	0.08%	0.01%	—%	0.02%	0.50%
9	Loans and advances	6.21%	0.08%	0.01%	—%	0.02%	0.50%
10	Debt securities, including UoP	—%	—%	—%	—%	—%	—%
11	Equity instruments	—%	—%		—%	—%	—%
12	of which management companies	—%	—%	—%	—%	—%	—%
13	Loans and advances	—%	—%	—%	—%	—%	—%
14	Debt securities, including UoP	—%	—%	—%	—%	—%	—%
15	Equity instruments	—%	—%		—%	—%	—%
16	of which insurance undertakings	0.45%	0.04%	—%	—%	—%	—%
17	Loans and advances	0.45%	0.04%	—%	—%	—%	—%
18	Debt securities, including UoP	—%	—%	—%	—%	—%	—%
19	Equity instruments	—%	—%		—%	—%	—%
20	Non-financial corporations (subject to NFRD disclosure obligations)	25.45%	11.60%	4.51%	2.60%	2.26%	11.26%
21	Loans and advances	25.45%	11.60%	4.51%	2.60%	2.26%	11.26%
22	Debt securities, including UoP	—%	—%	—%	—%	—%	—%
23	Equity instruments	—%	—%	—%	—%	—%	—%
24	Households	79.76%	6.62%	6.62%	0.09%	—%	23.46%
25	of which loans collateralised by residential immovable property	100.00%	8.87%	8.87%	—%	—%	17.26%
26	of which building renovation loans	100.00%	—%	—%	—%	—%	0.12%
27	of which motor vehicle loans	100.00%	1.65%	1.65%	1.65%	—%	1.33%
28	Local government financing	—%	—%	—%	—%	—%	0.24%
29	Housing financing	—%	—%	—%	—%	—%	—%
30	Other local government financing	—%	—%	—%	—%	—%	0.24%
31	Collateral obtained by taking possession: residential and commercial immovable properties	100.00%	—%	—%	—%	—%	0.03%
32	Total GAR assets	29.40%	3.75%	2.51%	0.41%	0.34%	82.05%



5. Ratio of Taxonomy-aligned off-balance sheet exposures in relation to turnover and CapEx KPIs

Ratio of Taxonomy-aligned off-balance sheet exposures in relation to **turnover** KPIs

		Disclosure reference date 31/12/2025												
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
% (compared to total eligible off-balance sheet assets)														
1	Financial guarantees (FinGuar KPI)	19.33%	1.08%	0.91%	0.01%	0.25%	0.27%	0.02%	— %	— %	0.09 %	— %	— %	— %
2	Assets under management (AuM KPI)	35.02%	11.59%	—%	1.24%	6.75%	2.16%	0.34%	— %	0.09 %	0.34 %	0.32 %	— %	— %

		Disclosure reference date 31/12/2025												
		Circular Economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
% (compared to total eligible off-balance sheet assets)				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
1	Financial guarantees (FinGuar KPI)	0.62 %	— %	— %	— %	0.30 %	— %	— %	— %	1.43 %	— %	— %	— %	— %
2	Assets under management (AuM KPI)	10.99 %	0.71 %	— %	0.38 %	6.79 %	0.14 %	— %	0.03 %	0.03 %	— %	— %	— %	— %

		Disclosure reference date 31/12/2025			
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which transitional	Of which enabling
% (compared to total eligible off-balance sheet assets)					
1	Financial guarantees (FinGuar KPI)	22.04%	1.10%	0.91%	0.01%
2	Assets under management (AuM KPI)	55.33%	13.10%	—%	1.24%
					7.26%

Ratio of Taxonomy-aligned off-balance sheet exposures in relation to turnover KPIs (flow)

		Disclosure reference date 31/12/2025												
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling			
% (compared to total eligible off-balance sheet assets)														
1	Financial guarantees (FinGuar KPI)	21.62%	0.81%	0.51%	0.01%	0.74%	0.34%	0.01%	—%	0.01%	0.05%	—%	—%	—%
2	Assets under management (AuM KPI)	38.78%	12.84%	—%	1.37%	7.47%	2.40%	0.37%	—%	0.10%	0.37%	0.35%	—%	—%

Disclosure reference date 31/12/2025													
		Circular Economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
% (compared to total eligible off-balance sheet assets)													
1	Financial guarantees (FinGuar KPI)	0.36%	—%	—%	—%	—%	—%	—%	—%	0.88%	—%	—%	—%
2	Assets under management (AuM KPI)	12.16%	0.79%	—%	0.42%	7.52%	0.15%	—%	0.04%	0.03%	—%	—%	—%

Disclosure reference date 31/12/2025					
TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
			Of which Use of Proceeds	Of which transitional	Of which enabling
% (compared to total eligible off-balance sheet assets)					
1	Financial guarantees (FinGuar KPI)	23.25%	0.82%	0.51%	0.75%
2	Assets under management (AuM KPI)	61.26%	14.51%	—%	8.03%

Ratio of Taxonomy-aligned off-balance sheet exposures in relation to CapEx KPIs

		Disclosure reference date 31/12/2025												
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		
% (compared to total eligible off-balance sheet assets)														
1	Financial guarantees (FinGuar KPI)	27.30 %	1.04 %	0.91 %	— %	0.17 %	0.67 %	— %	— %	— %	0.08 %	— %	— %	— %
2	Assets under management (AuM KPI)	46.47 %	18.30 %	— %	1.81 %	10.28 %	5.11 %	0.91 %	— %	0.55 %	0.46 %	0.35 %	— %	— %

		Disclosure reference date 31/12/2025											
		Circular Economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
% (compared to total eligible off-balance sheet assets)													
1	Financial guarantees (FinGuar KPI)	0.79 %	— %	— %	— %	0.29 %	— %	— %	— %	1.65 %	— %	— %	— %
2	Assets under management (AuM KPI)	7.39 %	1.04 %	— %	0.78 %	4.50 %	0.16 %	— %	0.03 %	0.03 %	— %	— %	— %

		Disclosure reference date 31/12/2025				
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which transitional	Of which enabling
% (compared to total eligible off-balance sheet assets)						
1	Financial guarantees (FinGuar KPI)	30.78 %	1.05 %	0.91 %	— %	0.18 %
2	Assets under management (AuM KPI)	63.96 %	20.76 %	— %	1.81 %	11.64 %

Ratio of Taxonomy-aligned off-balance sheet exposures in relation to CapEx KPIs (flow)

Disclosure reference date 31/12/2025													
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and Marine Resources (WTR)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
% (compared to total eligible off-balance sheet assets)													
1	Financial guarantees (FinGuar KPI)	28.06 %	0.83 %	0.51 %	— %	0.56 %	1.33 %	— %	— %	— %	0.03 %	— %	— %
2	Assets under management (AuM KPI)	51.45 %	20.26 %	— %	2.01 %	11.38 %	5.65 %	1.01 %	— %	0.61 %	0.51 %	0.39 %	— %

Disclosure reference date 31/12/2025													
		Circular Economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
% (compared to total eligible off-balance sheet assets)													
1	Financial guarantees (FinGuar KPI)	0.88 %	— %	— %	— %	— %	— %	— %	— %	1.03 %	— %	— %	— %
2	Assets under management (AuM KPI)	8.18 %	1.15 %	— %	0.86 %	4.99 %	0.18 %	— %	0.03 %	0.04 %	— %	— %	— %

		Disclosure reference date 31/12/2025				
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
			Of which Use of Proceeds	Of which transitional	Of which enabling	
% (compared to total eligible off-balance sheet assets)						
1	Financial guarantees (FinGuar KPI)	31.33 %	0.83 %	0.51 %	— %	0.57 %
2	Assets under management (AuM KPI)	70.81 %	22.99 %	— %	2.01 %	12.89 %

Amount and proportion of Taxonomy-aligned exposures reported in the GAR's denominator and numerator for nuclear and gas activities, mainly, in terms of both CapEx and turnover for each environmental objective.

Nuclear energy and fossil gas related activities in terms of turnover

Row Nuclear energy related activities		
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	YES
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	YES
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	YES
Fossil gas related activities		
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	YES
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	YES
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	YES

Nuclear energy and fossil gas related activities in terms of CapEx

Row Nuclear energy related activities		
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	YES
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	YES
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	YES
Fossil gas related activities		
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	YES
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	YES
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	YES

Taxonomy-aligned economic activities (denominator) in terms of turnover

Row	Economic activities	Amount and proportion (amounts presented in million euros)					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.1	0.02%	0.1	0.02%	—	—%
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.3	0.09%	0.3	0.09%	—	—%
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	7.4	2.20%	7.4	2.21%	—	—%
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1.1	0.31%	1.1	0.32%	—	—%
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.4	0.12%	0.4	0.12%	—	0.26%
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.2	0.05%	0.2	0.05%	—	—%
7	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	326.3	97.21%	324.6	97.20%	1.7	99.74%
8	Total applicable KPI	335.7	100.00%	333.9	100.00%	1.7	100.00%

Taxonomy-aligned economic activities (denominator) in terms of CapEx

Row	Economic activities	Amount and proportion (amounts presented in million euros)					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	—	—%	—	—%	—	—%
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.2	0.03%	0.2	0.03%	—	—%
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	5.0	0.92%	5.0	0.92%	—	—%
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	—	—%	—	—%	—	—%
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.3	0.06%	0.3	0.06%	—	—%
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.1	0.01%	0.1	0.01%	—	—%
7	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	542.8	98.98%	541.2	98.98%	1.6	100.00%
8	Total applicable KPI	548.4	100.00%	546.8	100.00%	1.6	100.00%

Taxonomy-aligned economic activities (numerator) in terms of turnover

Row	Economic activities	Amount and proportion (amounts presented in million euros)					
		(CCM + CCA)		Climate change mitigation		Climate change adaptation	
		Amount	%	Amount	%	Amount	%
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.3	—%	0.3	—%	—	—%
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	2.3	0.03%	2.3	0.03%	—	—%
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	181.2	1.95%	181.2	1.97%	—	—%
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	4.9	0.05%	4.9	0.05%	—	—%
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	1.9	0.02%	1.8	0.02%	0.1	0.07%
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.7	0.01%	0.7	0.01%	—	—%
7	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	9,103.6	97.94%	9,004.0	97.92%	99.6	99.93%
8	Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI	9,294.9	100.00%	9,195.2	100.00%	99.7	100.00%

Taxonomy-aligned economic activities (numerator) in terms of CapEx

Row	Economic activities	Amount and proportion (amounts presented in million euros)					
		(CCM + CCA)		Climate change mitigation		Climate change adaptation	
		Amount	%	Amount	%	Amount	%
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.2	—%	0.2	—%	—	—%
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	5.4	0.06%	5.4	0.06%	—	—%
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	110.0	1.19%	110.0	1.21%	—	—%
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	1.3	0.01%	1.3	0.01%	—	—%
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	1.4	0.02%	1.4	0.02%	—	—%
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.3	—%	0.3	—%	—	—%
7	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	9,153.8	98.72%	9,010.5	98.70%	143.3	100.00%
8	Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI	9,272.4	100.00%	9,129.1	100.00%	143.3	100.00%

Taxonomy-eligible but not Taxonomy-aligned economic activities in terms of turnover

Row	Economic activities	Proportion (amounts presented in million euros)					
		(CCM + CCA)		Climate change mitigation		Climate change adaptation	
		Amount	%	Amount	%	Amount	%
1	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	—	—%	—	—%	—	—%
2	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.1	—%	0.1	—%	—	—%
3	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.7	0.04%	0.7	0.04%	—	—%
4	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	40.4	2.42%	40.3	2.46%	—	0.07%
5	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	3.3	0.20%	2.9	0.18%	0.3	1.14%
6	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	—	—%	—	—%	—	—%
7	Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	1,620.6	97.33%	1,592.4	97.31%	28.1	98.79%
8	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI	1,665.0	100.00%	1,636.5	100.00%	28.5	100.00%

Taxonomy-eligible but not Taxonomy-aligned economic activities in terms of CapEx

Row	Economic activities	Proportion (amounts presented in million euros)					
		(CCM + CCA)		Climate change mitigation		Climate change adaptation	
		Amount	%	Amount	%	Amount	%
1	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	—	—%	—	—%	—	—%
2	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	—	—%	—	—%	—	—%
3	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.3	0.02%	0.3	0.02%	—	—%
4	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	15.9	0.96%	13.5	0.83%	2.3	7.18%
5	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2.2	0.13%	1.9	0.12%	0.3	0.92%
6	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	—	—%	—	—%	—	—%
7	Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	1,640.9	98.89%	1,611.0	99.03%	30.0	91.90%
8	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI	1,659.3	100.00%	1,626.7	100.00%	32.6	100.00%

Taxonomy non-eligible economic activities in terms of turnover

Row	Economic activities	Amount	Percentage
1	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	—	—%
2	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.2	—%
3	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	29.4	0.61%
4	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1.6	0.03%
5	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.8	0.02%
6	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.4	0.01%
7	Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	4,744.4	99.32%
8	Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI	4,776.7	100.00%

Taxonomy non-eligible economic activities in terms of CapEx

Row	Economic activities	Amount	Percentage
1	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	—	—%
2	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.7	0.02%
3	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	8.1	0.18%
4	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1.5	0.03%
5	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.7	0.02%
6	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.4	0.01%
7	Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	4,418.8	99.74%
8	Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI	4,430.3	100.00%



2.1 Climate change

Through its ESG action framework, Banco Sabadell has fully embedded aspects related to climate change into its governance model, its strategy, and into the management of the impacts, risks and opportunities linked to its business model and environment.

The Bank takes on the management of impacts, risks and opportunities, taking into account the concept of double materiality (financial and impact) as well as the various phases of the value chain in which they can emerge:

- In terms of impact, it is worth noting the efforts made by the Bank to reduce the environmental effects produced by the carbon footprint of its own operations, as well as its management of the carbon footprint of the financed portfolio.
- In terms of climate risk²⁶, the Bank has created the ESG credit risk guidelines, which are the framework that consolidates the ESG commitments and standards currently applied when authorising the Bank's credit transactions. Specifically, the ESG credit risk guidelines comprise the Environmental and Social Risk Framework, the advanced IRCA and decarbonisation pathways.
- Lastly, the Bank embraces the opportunities offered by the transition, supporting its customers as they face the challenges of climate change adaptation and mitigation. To that end, it offers Green and Social Loans (GSLs) and Sustainability-Linked Loans (SLLs), it offers advice and investment opportunities to its customers, and it frequently obtains funding by issuing green, social and sustainability bonds, in line with the Framework for the issuance of bonds linked to Sustainable Development Goals (SDGs).

As a financial institution, Banco Sabadell Group plays a fundamental role in building an inclusive and decarbonised economy. On one hand, mobilising resources, identifying technologies and generating opportunities and, on the other hand, incorporating new capabilities along with internal transformation efforts to embed sustainability into all of its agendas.

In this context, and to continue making progress with its goal of accelerating economic and social transformations that contribute to sustainable development, the Bank already reinforced the ESG dimensions applicable to its strategy, governance and business model back in 2022, with the launch of its ESG framework, *Sabadell's Commitment to Sustainability*, which establishes levers with transformation and promotion actions, notably including the following:

- Progress as a sustainable institution, focusing, among other things, on greenhouse gas (GHG) emissions neutrality.
- Support customers in the transition to a sustainable economy, laying down decarbonisation pathways, supporting customers in the transition with specialised solutions for renewable energy, energy efficiency and sustainable mobility, and defining sectoral rules that limit controversial activities and/or activities with negative impacts on environmental and social development.
- Offer investment opportunities that contribute to sustainability, where it is particularly worth mentioning the wide range of sustainability funds, green bonds and sustainability bonds that the Bank offers, both its own and those of third parties.

²⁶ Environmental risk is understood to be the risk of incurring losses as a result of the impacts, both those existing at present and those that may exist in the future, of environmental risk factors on counterparties or invested assets. Environmental risks can generate impacts through two factors: 'physical factors' and 'transition factors'.

2.1.1 Transition plan for climate change mitigation

Banco Sabadell continues to move ahead with its Decarbonisation Strategy, whilst at the same time moving closer to achieving global climate targets, as it is a signatory of the Collective Commitment to Climate Action (CCCA) and it is aligned with the voluntary framework of reference of the Net-Zero Banking Alliance (NZBA), in order to attain emissions neutrality in its investment and lending portfolios by 2050.

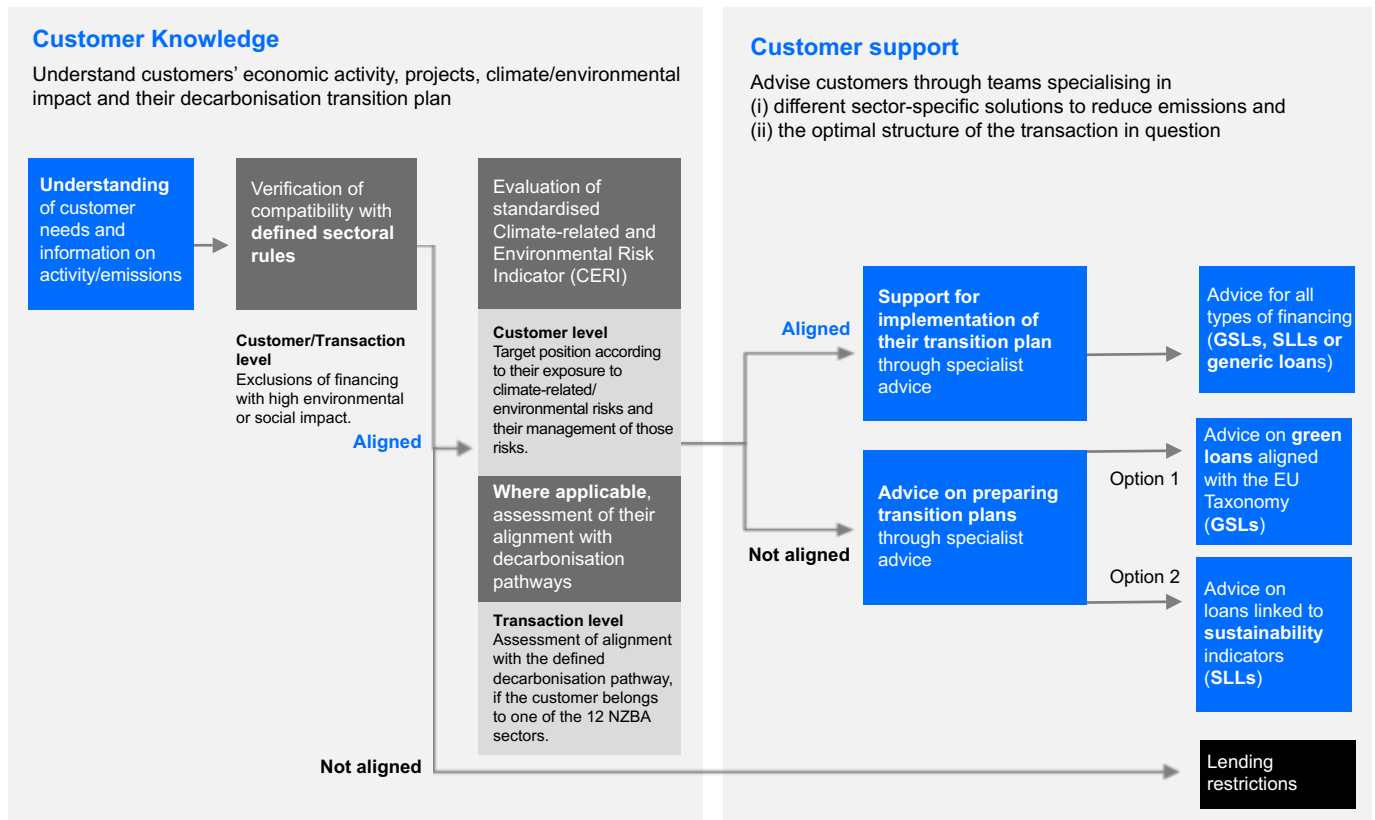
The Bank's commitment to decarbonisation covers all of its activities. It has therefore identified three main pillars, from which cross-cutting and sector-specific levers are activated:

- **Strategic action framework:** Banco Sabadell believes it is important to ensure that the financed portfolio is aligned with its decarbonisation targets and, to that end, it has introduced elements linked to decarbonisation in its Risk Appetite Framework, in its policies and in its sectoral planning processes, and it has set decarbonisation pathways to achieve those targets. The Bank also has an Environmental and Social Risk Framework, details of which are provided in section 2.1.2 Managing and monitoring the risks associated with climate change.
- **Support in the transition:** in its business activity and to support customers in the transition, the Institution is taking further action to raise awareness and offer advice across all sectors of the business fabric, offering solutions to finance the investments required for this transition. To that end, it is making all of its capabilities available through specialised teams and a Sustainable Financing Framework.
- **Risk management:** with regard to credit risk management, the Bank has introduced guidelines on managing ESG credit risk during the process of authorising credit transactions and during its portfolio monitoring, including ongoing monitoring of decarbonisation pathways.

Against this backdrop, and with the dual goal of activating its decarbonisation strategy in parallel to supporting customers by offering them financing for their projects, Banco Sabadell follows a process that consists of two stages to achieve customer engagement:

- **Know Your Customer (KYC) phase:** to understand customers' economic activity, projects, climate/environmental impact and their decarbonisation transition plan.
- **Customer support phase:** to advise customers through teams specialising in (i) different sector-specific solutions to reduce emissions and (ii) the optimal structure of the transaction in question.

The Institution does not have a CapEx plan for the transition since, as a financial institution, the transition plans focus primarily on providing support for customers' transition through the Bank's products and services.



Aligned/ Not aligned with the Bank appetite for ESG

- Specialist advice for customers
- In-house risk origination process

Banco Sabadell aligns its strategy with the Sustainable Development Goals (SDGs) and the Paris Agreement, together with regulatory and supervisory requirements, steering the organisation and helping customers and society in the transition towards a sustainable economy.

In 2020, the Group launched its Sustainable Finance Plan, which incorporates sustainability into the business model, risk management arrangements and the relationship with stakeholders, in addition to strengthening its governance with milestones such as the creation of a Sustainability Committee in 2020 and the creation of the Board Strategy and Sustainability Committee in 2021, the latter being a new Board Committee set up to define, promote and monitor all matters related to sustainability. The Sustainable Finance Plan is regularly approved, reviewed and updated by the Sustainability Committee to adapt it to environmental and regulatory changes and to the expectations of the various stakeholders. In addition, the pertinent governing bodies are informed of the most noteworthy developments.

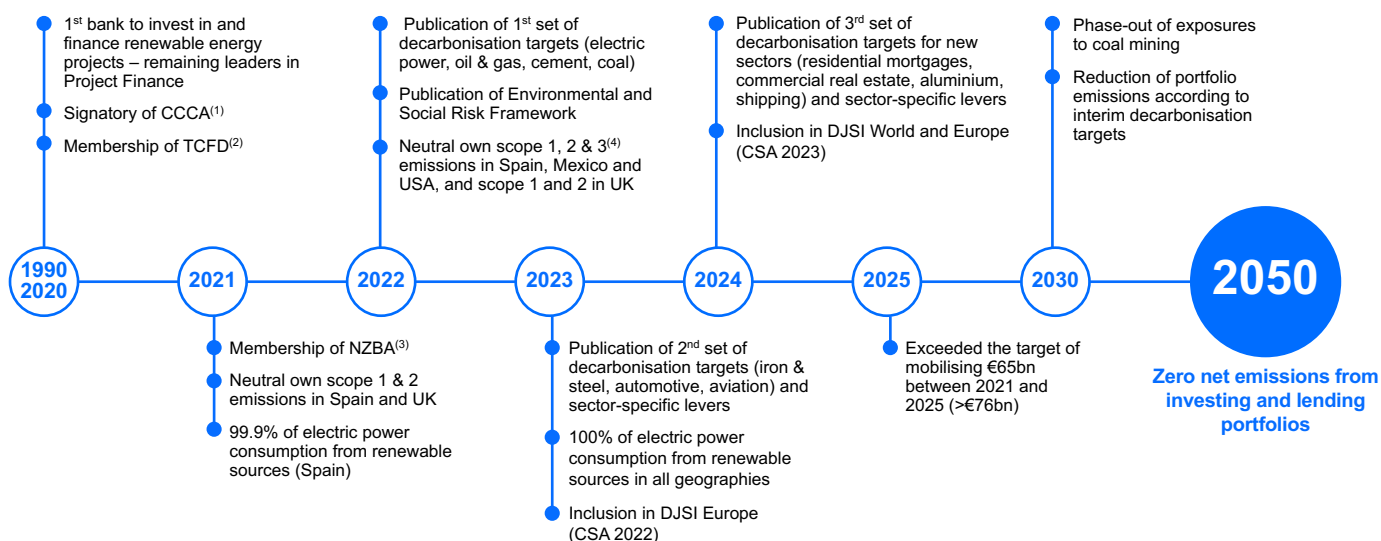
To complement this, the document *Sabadell's Commitment to Sustainability* was published in 2022. This action framework aims to embed ESG considerations sequentially across all of the Group's activities.

In December 2025, as part of this commitment, the Institution published its decarbonisation strategy for 2030 and a status report, as at the end of 2024, on the pathways disclosed previously and the main levers to ensure transition, along with its ambition to provide support, advice and sustainable financing to individuals and above all to companies, focusing specifically on those that belong to the world's most CO₂ emissions-intensive sectors.

The established targets are approved by Banco Sabadell's Board of Directors. In addition, regular monitoring reports are sent to governing bodies on the evolution of decarbonisation pathways.

In addition, in reference to the locked-in GHG emissions originated from the company's key assets and products, it is worth noting that, given the activity carried out by the Institution, these emissions are not material for the Bank's operations and they therefore do not have a significant impact on its environmental sustainability or on its financial statements.

Main milestones towards net zero by 2050



⁽¹⁾ Collective Commitment to Climate Action (2018).

⁽²⁾ Task Force on Climate-related Financial Disclosures (2020).

⁽³⁾ Net-Zero Banking Alliance.

⁽⁴⁾ Scope 3 emissions to be offset include supplies (water, paper and plastic), waste and business travel in Spain, Mexico and USA. This offsetting does not include emissions associated with the financed portfolio (category 15).

Portfolio alignment

Banco Sabadell Group considers that portfolio alignment and decarbonisation targets offer valuable information for risk management, on an ex-ante basis, as a portfolio that is aligned with a particular transition pathway and has decarbonisation targets will tend to be less impacted than one that is not aligned and has no targets (assuming the selected reference scenarios remain close to the actual trajectory).

In 2021, Banco Sabadell Group joined the Net-Zero Banking Alliance (NZBA), undertaking to align its lending and investment portfolios with net-zero emissions of greenhouse gases (GHGs) by 2050 at the latest, in line with the targets of the Paris Agreement. After the NZBA changed into a voluntary reference framework in 2025, Banco Sabadell maintains its commitments and follows the recommendations of the NZBA in order to foster the transition of its customers.

In turn, these commitments involve setting targets for 2030, with interim targets to be set every five years thereafter for the most GHG-intensive sectors, based on the analysis of customers' carbon footprints and on sectoral decarbonisation pathways, which are based on scientific criteria defined by recognised international bodies.

Information about exclusions applicable to EU benchmarks

Based on the activity criteria that establish exclusions applicable to the EU Paris-aligned benchmarks set out in Commission Delegated Regulation (EU) 2020/1818, it has been determined that the Bank is not excluded from those benchmarks on the grounds of the activity that it performs.

The Institution remains committed to attaining greenhouse gas emissions neutrality and it does this through two main courses of action. On one hand, the Institution is committed to neutralising the carbon footprint originated by its own operations, by reducing the scope 1, 2 and 3²⁷ emissions through the decarbonisation levers described next in this section. On the other hand, the Institution remains committed to decarbonising its balance sheet by reducing the carbon footprint of the credit portfolio.

Emission reduction targets of the loan book

In line with the commitments established by the NZBA guidelines, in December 2025, Banco Sabadell continued to move forward with its strategy to fight against climate change, by tracking the established decarbonisation targets.

As a result of its ongoing efforts, the Bank covered 11 sectors as at the end of 2025, which are the most emissions-intensive and for which a target-setting methodology exists.

Specifically, in December 2022, the Bank published the first four decarbonisation targets for the Electricity, Oil & Gas, Cement, and Coal mining industries; in December 2023, it disclosed further targets for the Aviation, Automotive, and Iron & Steel industries, and in December 2024 it did the same for the Residential mortgages, Commercial real estate, Aluminium, and Shipping industries.

In the farming sector, the lack of robust methodologies and comparable data means that quantitative targets cannot be established. However, the Institution continues to assess its farming portfolio, focusing on customer engagement, and it will set decarbonisation targets once uniform data and suitable methodologies are available to carry out a sound assessment.

The activities covered by the aforesaid targets centre on the stage of each sector's production chain where transition is most likely to reduce the overall volume of greenhouse gas emissions.

With this goal in mind, commitments have been determined taking into account the Net Zero Emissions by 2050 (NZE2050) scenario published by the International Energy Agency (IEA), which establishes decarbonisation pathways for different sectors that are consistent with limiting the global temperature rise to 1.5°C above pre-industrial levels. The commitments have been set based on the methodology of the Science-Based Targets initiative (SBTi) for all sectors except for electricity, residential mortgages and shipping (Alignment Delta). The affected customer segment is that of large corporates.

²⁷ Excluding category 15: Investments.

Targets published as at December 2024

Sector	Value chain stage	Emissions scope	Reference scenario	Metric	Base year	Base year metric	Target 2030	% reduction
Electricity	Electricity generation	1 & 2	IEA Net Zero 2050	Physical intensity Kg CO ₂ e / MWh	2020	61	45 - 85	-
Oil & Gas	Upstream & Downstream ⁽¹⁾	1, 2 & 3	IEA Net Zero 2050	Absolute emissions Kt CO ₂ e	2020	6,300	4,851	-23% vs 2020
Cement	Manufacture	1 & 2	IEA Net Zero 2050	Physical intensity Kg CO ₂ e / tonne cement	2020	660	510	-23% vs 2020
Coal	Mining activity	Not applicable	IEA Net Zero 2050	Exposure Mn euros	2020	3	~0	-100% vs 2020
Iron & Steel	Manufacture	1 & 2	IEA Net Zero 2050	Physical intensity KgCO ₂ e / tonne steel	2022	1,593	1,172	-26% vs 2022
Automotive	Manufacture / OEMs ⁽²⁾	3	IEA Net Zero 2050	Physical intensity gCO ₂ e / vkm ⁽³⁾	2022	211	124	-41% vs 2022
Aviation	Airlines	1 & 2	IEA Net Zero 2050 ⁽⁴⁾	Physical intensity gCO ₂ e / rpk ⁽⁵⁾	2022	94	65	-31% vs 2022
Residential mortgages	Owner	1 & 2	CRREM 1.5°C ⁽⁶⁾	Physical intensity Kg CO ₂ e/m ²	2023	20.9	16.8	-20% vs 2023
Commercial real estate	Owner	1 & 2	CRREM 1.5°C ⁽⁶⁾	Physical intensity Kg CO ₂ e/m ²	2023	25.7	12.6	-51% vs 2023
Aluminium	Production	1 & 2	IAI 1.5°C ⁽⁷⁾	Physical intensity Kg CO ₂ e/tonne aluminium	2023	645	549	-15% vs 2023
Shipping	Operator	1 & 3	IMO ⁽⁸⁾	Alignment Delta (AD%) ⁽⁹⁾ Delta gCO ₂ e / tnm ⁽¹⁰⁾	2023	Delta +25%	Delta 0%	-
Farming	(Analysis in progress: focus on customer engagement)							

Notes about methodology applied: Base year (2020) data and 2030 targets are based on the large corporations segment. To determine industry commitments based on the reduction of emissions intensity (electricity and cement), average emissions intensity has been calculated based on emissions and attributed output according to the amount of financing granted. The commitments have been determined based on the methodology of the Science-Based Targets initiative (SBTi) and the pathway indicated in the reference scenario for the oil & gas, cement and coal industries.

⁽¹⁾ Includes refining.

⁽²⁾ OEM: Original Equipment Manufacturer. Scope 3 emissions are those linked to the use of sold vehicles (category 11 - Use of sold products).

⁽³⁾ vkm: vehicle kilometre.

⁽⁴⁾ A correction factor has been added to the scenario to remove the distortion caused by Covid-19 in the forecast data for the 2019-2030 period, due to the reduced aircraft occupancy rate during the pandemic.

⁽⁵⁾ rpk: revenue passenger kilometre.

⁽⁶⁾ CRREM: Carbon Risk Real Estate Monitor for Spain and Portugal, specific to the residential real estate sector for the EU.

⁽⁷⁾ Decarbonisation trajectory determined by the International Aluminium Institute (IAI) for recycled aluminium.

⁽⁸⁾ International Maritime Organization.

⁽⁹⁾ Annual Efficiency Ratio (AER), which measures the efficiency of a vessel's carbon emissions associated with its transport work over a one-year period, representing the grams of CO₂ emitted per tonne-nautical mile (gCO₂/tnm) and per tonne of cargo transported (gCO₂/t). Alignment Delta (AD%), a metric that measures the extent to which the carbon emissions intensity of a vessel or portfolio of vessels is aligned with the underlying decarbonisation trajectory for each type of asset that meets the target of the International Maritime Organization.

⁽¹⁰⁾ tnm: tonne-nautical mile.

Sector	Value chain stage	Emissions scope	Reference scenario	Metric	Base year	Base year metric	Target 2030	% reduction vs base year
Residential mortgages (TSB)	Owners	1 & 2	IEA ETP B2DS ⁽¹⁾	Emission intensity kg CO ₂ e/m ²	2022	20.14	11.75	-42% vs 2022

⁽¹⁾ International Energy Agency's Below 2 Degrees Scenario.

Monitoring of decarbonisation targets

Sector	Metric	2020	2021	2022	2023	2024	Change vs base year - 2024	Target 2030
Electricity	Physical intensity KKg CO ₂ e / MWh	61	77	68	63	40	Below target range	45 - 85
Oil & Gas	Absolute emissions KKt CO ₂ e	6,300	5,466	4,923	4,820	5,277	-16.2%	4,851
Cement	Physical intensity Kg CO ₂ e / tonne cement	660	651	645	609	574	-13.0%	510
Coal	Exposure KMn euros	2.9	2.2	3.3	0.1	1.7	Remains at values close to target	~0
Iron & Steel	Physical intensity KKg CO ₂ e / tonne steel	-	-	1,593	1,497	1,403	-11.9%	1,172
Automotive	Physical intensity gCO ₂ e / vkm(1)	-	-	211	220	183	-13.3%	124
Aviation	Physical intensity gCO ₂ e / rpk(2)	-	-	94	90	91	-3.2%	65
Residential mortgages	Physical intensity Kg CO ₂ e/m ²	-	-	-	20.9	20.7	-1.0%	16.8
Commercial real estate	Physical intensity Kg CO ₂ e/m ²	-	-	-	25.7	22.4	-12.8%	12.6
Aluminium	Physical intensity Kg CO ₂ e/tonne aluminium	-	-	-	645	708	9.8%	549
Shipping	Alignment Delta (AD%)(3) Delta gCO ₂ e/tnm(4)	-	-	-	Delta +25%	Delta +28%	+3 p.p.	Delta 0%

Notes about methodology applied: Pathway evolution calculated based on customer exposure as at year-end and on counterparties' most recent data available in the last quarter of 2024.

(1) vkm: vehicle kilometre.

(2) rpk: revenue passenger kilometre.

(3) Annual Efficiency Ratio (AER), which measures the efficiency of a vessel's carbon emissions associated with its transport work over a one-year period, representing the grams of CO₂ emitted per tonne-nautical mile (gCO₂/tnm) and per tonne of cargo transported (gCO₂t). Alignment Delta (AD%), a metric that measures the extent to which the carbon emissions intensity of a vessel or portfolio of vessels is aligned with the underlying decarbonisation trajectory for each type of asset that meets the target of the International Maritime Organization.

(4) tnm: tonne-nautical mile.

Sector	Metric	2020	2021	2022	2023	Change vs base year - 2023	Target 2030
Residential mortgages (TSB)	Emission intensity kgCO ₂ e/m ²	-	-	20.1	19.6	-2.6%	11.75

In relation to the achievement of the established targets, where a significant transaction is identified that meets the requirements that make it subject to the pathway, an *ad hoc* analysis is carried out to quantify its impact on the pathway and to ensure that the stipulated limits are observed and that achievement of the 2030 target is not jeopardised. Specifically, a team of specialists reviews (i) the physical intensity of the customer's emissions (absolute emissions, if applicable) to analyse their existing situation, and (ii) the customer's future commitments, to determine their transition efforts.

In addition, the Bank applies its decarbonisation strategy ensuring various levers depending on the circumstances of the sector and of the customers themselves.

Electricity

Context

A decarbonised electricity sector is the foundation for a carbon-neutral energy system, as it plays a key role both as a direct source of emissions and due to its part in driving forward the necessary electrification of the economy in order to decarbonise end-use industries.

The electricity generation industry was one of the priority sectors for Banco Sabadell when the Group set its first climate targets for sectors' decarbonisation. As at the end of 2024, it represented around 7.2% of the risk originated in its business portfolio.

Targets

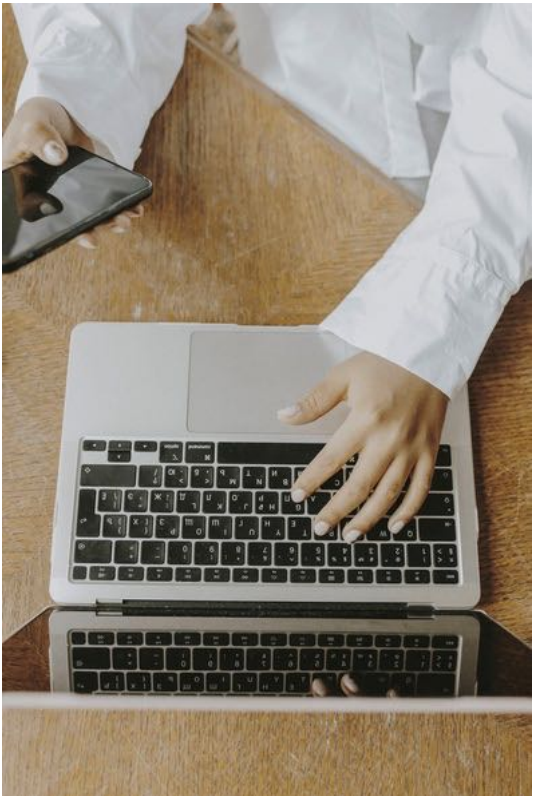
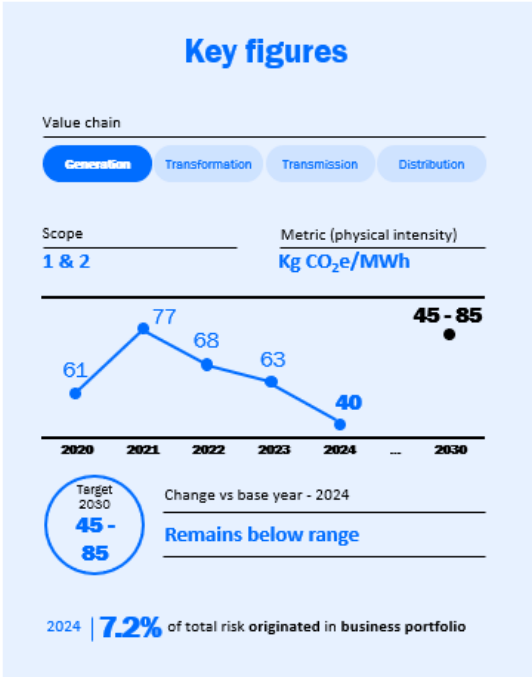
The Bank's baseline was 61 kg CO₂e/MWh, a value far below that of the reference scenario (IEA NZE2050) and below the values of most of its peers for both the base year and the 2030 target. In fact, it was already at the level that the industry is expected to attain between 2036 and 2037, mainly due to the Bank's specialisation in renewable energy.

For this reason, Banco Sabadell's aim is to keep its physical intensity at a range of between 45 and 85 kgCO₂e/MWh in 2030, with the top end of the established range being far below the industry's emissions intensity considered in the IEA NZE2050 pathway and in the commitments undertaken by the sector. This range fulfils the internal goal of ensuring that all customers are supported in their transition process, aligning it with both the REPowerEU plan and the European Union's ambitious renewable energy targets.

Evolution

Between setting the targets and 2024, the sector's emission intensity remained below the established reduction target, thanks to the contribution of renewables project finance and the improved emission intensity of corporate customers. The pathway's evolution shows the expected trend, with fluctuations caused by loans and support given to corporate customers with plans and ambitions to transition in the sector, as well as natural movements caused by write-downs and maturities in the project finance portfolio.

In terms of the attainment of targets, in this sector, in addition to the cross-cutting levers, additional sector-specific levers have been defined to complement these in terms of both origination and the existing pipeline. In terms of origination, it is worth noting that the Group's Environmental and Social Risk Framework establishes specific restrictions in this sector, relating to both the types of customers and their projects.



Oil & Gas

Context

The Oil & Gas sector is responsible for around 15% of annual emissions related to energy on a global scale and for a further 40% due to the use of its products.

Historically, the Bank has typically had only limited exposure to GHG emissions-intensive sectors. Specifically, as at the end of 2024, the oil and gas activities subject to pathways represented less than 2.0% of the total amount drawn down in the business portfolio¹.

(1) As this target concerns the reduction of absolute emissions, it is measured in terms of the amount drawn down.

Targets

The commitment undertaken by the Institution is to reduce total financed emissions (scope 1, 2 and 3) by 23% by 2030 compared to 2020.

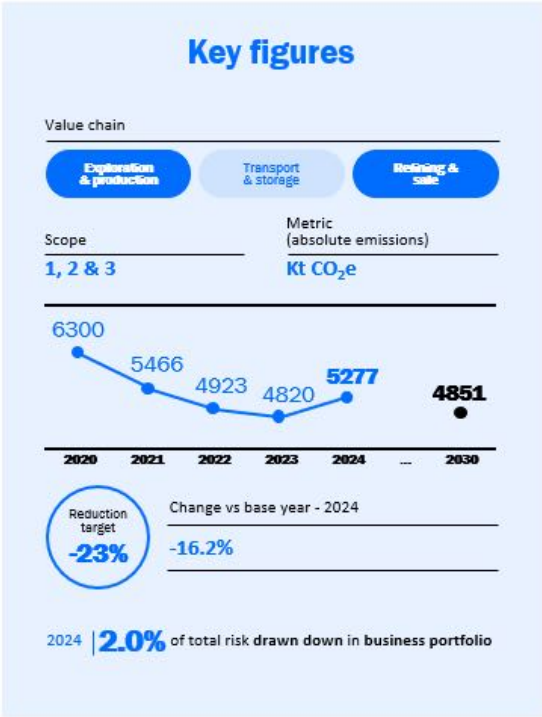
To set this target, the Bank analysed the commitments undertaken by its main customers.

Evolution

The pathway between the base year and 2024 shows that financed emissions have been reduced by 16.2%. This decline in emissions is due both to a reduced emission intensity of companies in this portfolio and to the reduction of exposures to companies with the highest emissions.

In 2024, emissions rose slightly due to new provisions in companies in the sector, although the portfolio's emission levels remain below the established pathway.

To ensure attainment of the targets, in this sector, additional sector-specific levers have been defined in the origination process, notably the Group's Environmental and Social Risk Framework, which sets out restrictions specific to this sector to avoid taking on credit risk for projects where there is sufficient evidence of involvement in activities such as hydraulic fracturing extraction (fracking), Arctic oil & gas exploration and production, or oil sands exploration and production.



Cement

Context

This sector is responsible for close to 7% of global emissions, with two-thirds of emissions generated by the raw materials and fossil fuels (mainly coal and, to a lesser extent, petroleum coke) used in the production process.

It is worth noting that, historically, the Bank’s exposure to carbon-intensive sectors has typically been small. As at the end of 2024, activities subject to the cement industry’s pathways accounted for around 0.2% of the total risk granted in the business portfolio.

Targets

The aim of the Bank is for its emission intensity to be 23% lower in 2030 than in 2020, which is in line with the commitments undertaken by other peers in the sector.

To set this target, the Bank analysed the commitments undertaken by its main customers.

Evolution

The pathway between the base year and 2024 shows that the average emission intensity of the cement portfolio has fallen by 13.0%. This decline in emissions is due both to a reduced emission intensity of companies in this portfolio and to the reduction of exposures to companies with the highest emission intensity.

Lastly, it ought to be taken into account that the reduction targets set by companies in this portfolio might increase in the future, once further advances are made in the emissions reduction technologies that the sector needs and which are not currently available.



Coal

Context

The use of coal as a source of thermal energy for the generation of electricity and heat is thought to be responsible for around 40% of the world's total energy-related emissions.

Historically, the Bank has typically had only limited exposure to GHG emissions-intensive sectors and in general, and to the thermal coal mining industry in particular, accounting for less than 2 million euros¹ of the total risk originated in its credit portfolio.

(1) As this is a phase-out target, it is measured in terms of risk originated.

Targets

The Bank's aim, in line with the expectations of the NZBA and the reference scenarios, is to have zero exposure to thermal coal mining activities by 2030.

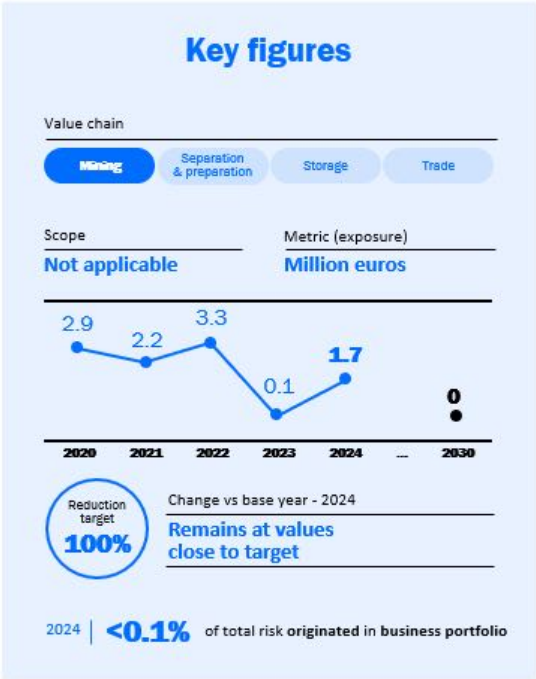
Evolution

In terms of how the pathway has developed since it was first established, as can be seen in the table above, the Bank's exposure in this sector is residual and smaller than it was in the base year, remaining at values close to the phase-out target. It expects to reach this target once its currently outstanding positions have matured, and the restrictions applicable to the origination of new transactions will also help it on its way.

In 2024, there was a slight increase due to fluctuations in the amounts drawn from a factoring facility maturing before 2030, meaning that the commitment associated with the pathway was ultimately not met.

The Bank nevertheless remains firmly committed to reducing its exposure to companies in that sector and expects to reach its 2030 target.

It is worth noting that the Bank applies customer-specific and project-specific restrictions.



Iron & Steel

Context

This sector accounts for around 7% of annual GHG emissions on a global scale, having increased in the past decade, in large part due to increased demand for steel, which is expected to continue rising throughout this decade.

Historically, the Bank has typically had only limited exposure to GHG emissions-intensive sectors. Specifically, the activities in the iron and steel sector affected by pathways represented, as at the end of 2024, around 0.8% of the total amount of risk originated in the business portfolio.

Targets

The Bank has set itself the target of reducing the emission intensity per tonne of steel and/or iron produced by 26%, in line with the reference scenario (NZE2050).

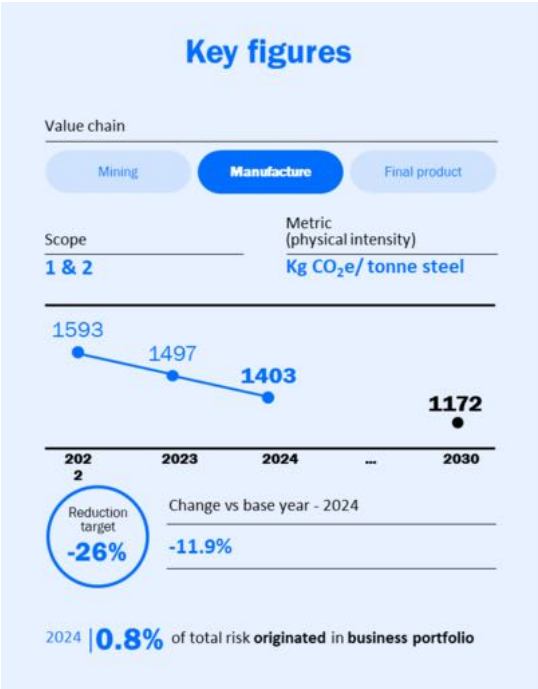
To set this target, the Bank analysed the commitments undertaken by its main customers. Information about the commitments undertaken is available for 82% of the portfolio in this sector in terms of exposure.

Evolution

As at the end of 2024, the average emission intensity was around 11.9% lower than in the base year. This decline in emissions is due both to a reduced emission intensity of companies in this portfolio and to the reduction of exposures to companies with the highest emission intensity.

In terms of the business outlook and the assistance provided to customers as they transition, the Bank will continue to support the investment plans of customers linked to, for example, initiatives for the use of renewable energy sources in manufacturing processes, the improved energy efficiency of the furnaces and kilns used in the process, or actions to build circularity into the raw materials used through increased recycling of scrap, thereby promoting more sustainable manufacturing systems.

In order to significantly reduce the intensity of emissions, it will be vital to implement and develop new technologies, such as the use of green hydrogen to cut the carbon intensity of the steel manufacturing process, or the capture and storage of carbon released during manufacturing.



Automotive

Context

The use of vehicles and the emissions linked to the fuel used to power their engines were estimated to be responsible for around 10% of global emissions associated with energy consumption in 2022.

Historically, the Bank's exposure to carbon-intensive sectors has typically been small. Specifically, the activities in the automotive sector affected by pathways represented, as at the end of 2024, around 0.2% of the amount of risk originated in the business portfolio.

Targets

The Bank has set itself the target of reducing the emission intensity per kilometre travelled per vehicle by 41%, in line with the reference scenario (IEA Net Zero 2050).

To set this target, the Bank analysed the commitments undertaken by its main customers.

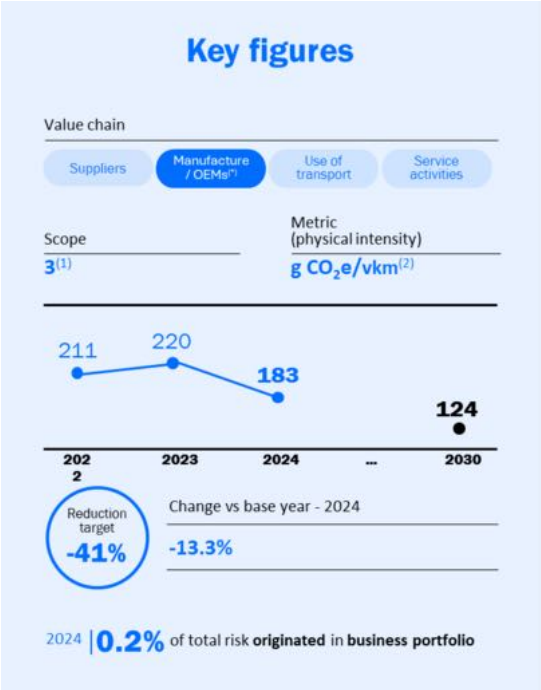
However, it is worth noting that European regulations governing vehicle manufacture could potentially be eased, which could result in vehicle manufacturers altering their commitments.

Evolution

As at the end of 2024, the average emission intensity of the automotive portfolio had fallen by 13.3% compared to the base year, on track to meet the 2030 target. This reduction was driven by the increased exposure to groups with emission intensities and targets for 2030 that are aligned with the decarbonisation pathway set by the Institution.

In terms of the business outlook and the assistance provided to customers, the Bank will continue to support the investment plans of its customers linked to, for example, initiatives involving the use of renewable energy in the manufacturing process, the improved energy efficiency of the manufacturing plants, the adaptation of production lines for the gradual adaptation of the product portfolio, favouring vehicles that use sustainable fuels and which are more efficient and smaller in size, or the use of sustainable raw materials.

Thus, the boost provided by the electrification of the economy, the rollout on a massive scale of the electric vehicle charging infrastructure, the marketing and sale of synthetic fuels and the capacity to generate renewable energy to power the infrastructure will also play a role in supporting the sector's transition and they will have a domino effect on the value chain.



(1) Scope 3 emissions are those linked to the use of sold vehicles (category 11 - Use of sold products).

(2) vkm: vehicle kilometre.

Aviation industry

Context

Air transportation accounts for a relatively small share of global GHG emissions, although the intensity of those emissions in proportion to the volume transported is considerable, and it is important to note that in recent decades air transport has seen a proportionally higher increase in GHG emissions than other similar sectors, such as railway, land and maritime transport.

Historically, the Bank’s exposure to carbon-intensive sectors has typically been small. Specifically, activities subject to pathways in the aviation sector represented less than 0.3% of the total risk originated in the business as at the end of 2024.

Targets

The Bank has set itself the target of reducing the emission intensity per revenue passenger kilometre (rpk) by 31%, in line with the reference scenario.

Activities subject to pathways in the aviation sector represented less than 0.3% of the total risk originated in the business portfolio as at the end of 2024.

On this point, it is important to mention that, to set this target, the Bank analysed the commitments undertaken by its main customers.

Evolution

In 2024, the average emission intensity of the aviation portfolio was 3.2% lower than in the base year. The reduction in the emission intensity is in fact due to a combination of lower risk levels with the most carbon-intensive counterparties and the improved performance of borrowers included in the Institution’s credit portfolio.

In terms of the business outlook and the assistance provided to customers as they transition, the Bank will continue to support the investment plans of its customers linked to, for example, key initiatives such as the modernisation of fleets by including aircraft with improvements in the design and/or the propulsion system, faster uptake of low-carbon sustainable aviation fuels, or the optimisation of operations.

In this respect, the boost provided by the promotion of disruptive technology in new propulsion systems, such as electric, hybrid and hydrogen engines, will have a catalyst effect on the sector’s decarbonisation.



(1) rpk: revenue passenger kilometre.



Residential real estate mortgages (Spain)

Context

The real estate sector, which includes residential real estate, is a sizeable producer of CO₂ emissions. According to the United Nations Environment Programme, emissions generated by the construction sector and buildings account for more than 37% of global CO₂ emissions.

In terms of the perimeter, this includes loans granted to retail customers for home purchase, which as at December 2024 represented around 20% of the total amount originated in the credit book¹.

(1) Includes TSB mortgages and excludes fixed income and derivatives.

Targets

The Bank has undertaken to reduce the emission intensity of its retail mortgages portfolio in Spain by 20% between 2023 and 2030.

Applying the SBTi methodology and the CRREM scenario to the perimeter considered (loans and credit granted to retail customers for home purchase), the value of the metric as at the end of 2023 gives a final physical energy emission intensity of 20.9 kgCO₂e/m².

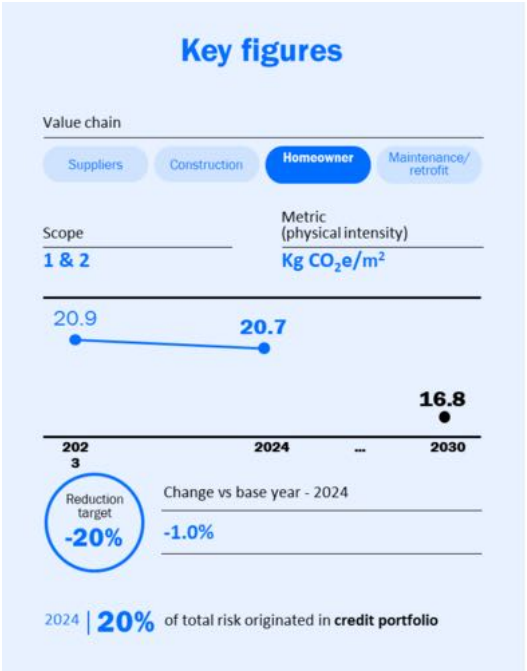
The Institution undertakes to reach an emission intensity of 16.6 KgCO₂ /m² by 2030.

Evolution

In terms of how the pathway has evolved up to the end of 2024, the average emission intensity of the portfolio has been reduced by 1.0% compared to the end of 2023, going from 20.9 to 20.68 kgCO₂e/m².

It should be mentioned that, to achieve this target, the Bank has incorporated specific metrics into its Risk Appetite Framework to (i) boost the granting of new lending items for properties that have good Energy Performance Certificate (EPC) ratings and low emission intensity (A/B/C), and (ii) limit the granting of new lending items for properties with poor ratings and emission intensities.

In the long term, achievement of that target will also largely depend on external factors, such as the evolution of the energy mix (grid), the implementation of effective public policies, and the large-scale reform of already existing properties.



Commercial real estate (Spain)

Context

The National Integrated Energy and Climate Plan (Plan Nacional Integrado de Energía y Clima, or PNIEC) for 2023-2030 highlights the importance of the commercial real estate sector for Spain’s decarbonisation, as 39% of direct emissions stemming from the use of fossil fuels in the real estate sector can be attributed to institutional and commercial buildings.

In terms of the perimeter, this includes loans granted to legal persons for business use to acquire commercial real estate (all non-residential uses), which as at December 2024 represented around 1.4% of the total amount originated in the business portfolio.

Targets

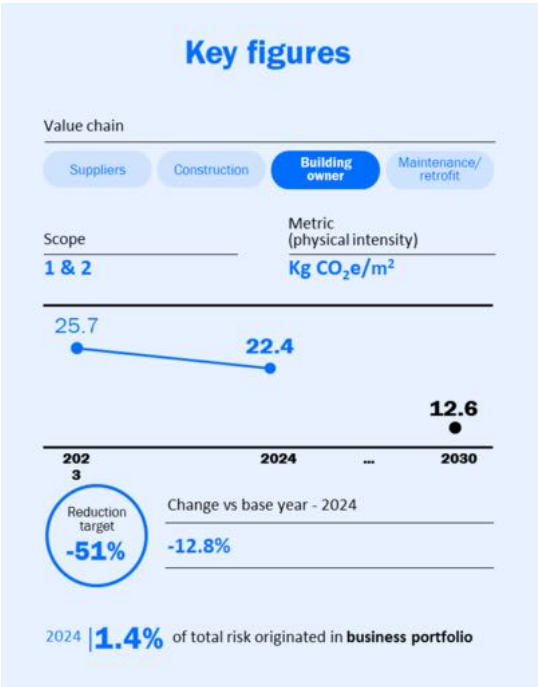
The Bank has undertaken to reduce the emission intensity of its Spanish portfolio of commercial real estate (mortgages granted for business premises) by 51% between 2023 and 2030.

The value of the metric as at the end of 2023 gives a final physical emission intensity associated with the consumption of energy of 25.66 (kgCO₂e/m²). The Institution has undertaken to reach an intensity of 12.58 KgCO₂/m²/year by 2030.

Evolution

In terms of how the pathway has evolved up to the end of 2024, the average emission intensity of the portfolio has fallen by 12.8% compared to the end of 2023, going from 25.7 to 22.4 kgCO₂e/m², meaning that it is on track to meet the 2030 target.

This improvement is partly due to the improved data quality in portfolios with EPC rating data.



Aluminium

Context

Aluminium is a key material in the transition to a low-carbon economy, as its lightweight, strong and rust-resistant properties make it a metal with multiple uses, from electric vehicles to renewable energies.

As for the application perimeter, this includes loans for business purposes granted to counterparties¹ with significant involvement in the production of aluminium (whether primary or recycled), which as at December 2024 accounted for around 0.1% of the total risk originated in the business portfolio.

(1) It does not include counterparties that are currently only involved in other stages of the value chain (i.e. companies that transform aluminium into an end product).

Targets

The Bank has set itself the target of reducing the emission intensity of its entire aluminium portfolio by 15% between 2023 and 2030. Thus, using a baseline of 645 kgCO₂e/tonne aluminium, the Bank projects a 15% reduction in the portfolio's emissions intensity by 2030, to reach 549 kgCO₂e/tonne aluminium.

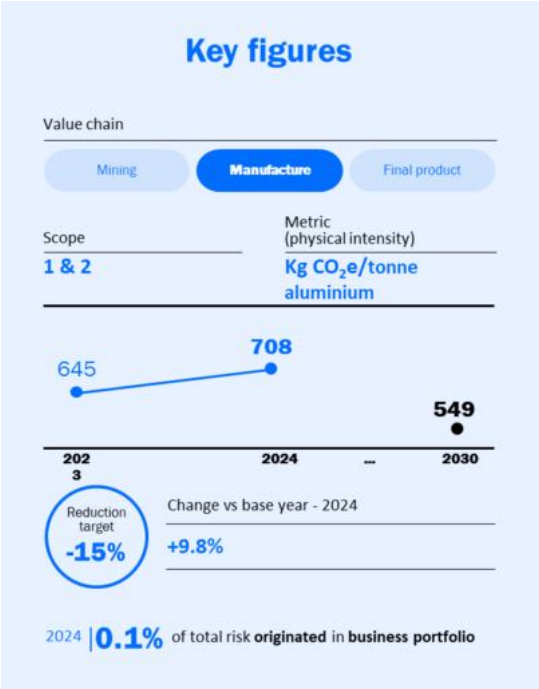
On one hand, this target reflects an approach aligned with international best practice but, on the other hand, it has been fully adapted to the characteristics of the Institution's portfolio.

To set this target, the Bank analysed the commitments undertaken by its main customers. No information about the commitments undertaken is available for the portfolio in this sector in terms of exposure.

Evolution

In terms of how the pathway has evolved up to the end of 2024, there has been a slight increase (of 9.8%) in the average emission intensity of the portfolio compared to the end of 2023.

This increase is mainly due to changes in the portfolio composition, which is heavily concentrated in a small number of borrowers in the sector; however, this one-off development in 2024 does not put the Institution at risk of failing to deliver on its commitment for 2030.



Maritime transport (shipping)

Context

The shipping sector is vital for global decarbonisation, as it transports approximately 90% of internationally traded goods and is responsible for between 2% and 3% of greenhouse gas (GHG) emissions. Its transformation is essential to the achievement of climate targets and climate change mitigation.

As for the perimeter, this includes risk exposures associated with credit items granted to finance vessels' operational phase (Owner/Operator transporting the cargo from port to port), as the 'usage' accounts for the majority of the emissions (>70%) of the value chain. As at December 2024, these accounted for less than 0.1% of the total amount originated in the business portfolio.

Targets

In 2024, the Institution set itself the goal of aligning the overall emission intensity of its shipping (maritime transport) portfolio in Spain with the reduction targets set by the IMO for the period between 2023 and 2030.

To set this target, the Bank analysed the commitments undertaken by its main customers.

Evolution

In terms of the evolution of the decarbonisation pathway, as at the end of 2024, the emission intensity of financed vessels was, on average, 28% above the decarbonisation trajectory provided by the IMO, standing at +3p.p. compared to the base year.

This rise in the alignment delta is explained by the fact that the target delta was calculated in the base year, 2024, but at the time of the estimate, no up-to-date data was available for the vessels in the portfolio, so the data for 2023 was used.



(1) Annual Efficiency Ratio (AER), which measures the efficiency of a vessel's carbon emissions associated with its transport work over a one-year period, representing the grams of CO₂ emitted per tonne-nautical mile (gCO₂/tnm) and per tonne of cargo transported (gCO₂t). Alignment Delta (AD%), a metric that measures the extent to which the carbon emission intensity of a vessel or portfolio of vessels is aligned with the underlying decarbonisation trajectory for each asset class that meets the target of the International Maritime Organization.

(2) tnm: tonne-nautical mile.

The Institution's decarbonisation targets

Spain

With a firm resolve to support and accelerate economic and environmental transformations, in 2025 Banco Sabadell took on new commitments to reduce the carbon footprint of its scope 1 and 2 emissions by 9% by 2030, taking 2024 as the base year.

The following table shows the targets for Spain and the changes that have taken place since the base year 2024:

CO ₂ emissions reduction targets in Spain	Base year 2024	
	Target 2030	% change in 2025
Scope 1 & 2, market-based	-9%	+53%

The increase in emissions compared to 2024 was mainly associated with refrigerant gas leaks in 2025. As detailed later on, the Institution is determined to make progress in preventing CO₂e emissions associated with refrigerant gases, and to that end it is upgrading the climate control equipment across its network of branches.

In terms of the business travelling and employee commuting categories, in 2025, a Workplace Travel Plan was established for the two corporate buildings with the most staff, both of which are located in Catalonia, namely the corporate building in Sant Cugat del Vallés and the corporate building in Sabadell, thereby complying with the regulations currently in force in that autonomous community. In the Travel Plan, new targets were set for 2030, which concern the use of private vehicles (cars and motorbikes), with a proposal to reduce emissions by -3.45% per year, as well as GHG emissions, with a proposal to reduce annual CO₂e emissions by -2.69%.

To achieve those targets in relation to mobility, the Bank identified thirty schemes in relation to different areas of activity, ranging from organisational measures, campaigns and initiatives to raise awareness about sustainable mobility, and including several measures related to encouraging the use of public transport over the use of private vehicles.

In relation to the reduction targets for the operational footprint of scope 1 and 2 emissions, several key levers were also identified, such as the continued acquisition of electric power from renewable sources and plans to upgrade the existing HVAC systems, gradually replacing installations that use high Global Warming Potential (GWP) refrigerant gases with HVAC systems that use less polluting refrigerant gases.

The emissions target for 2025, on a like-for-like basis with the types of emissions calculated in 2019, is 5,576 tCO₂e, corresponding to a reduction of -36.2%.

If we include emissions from employee commuting, calculated as from 2023, the emissions target for 2025 rises to 7,739 tCO₂e.

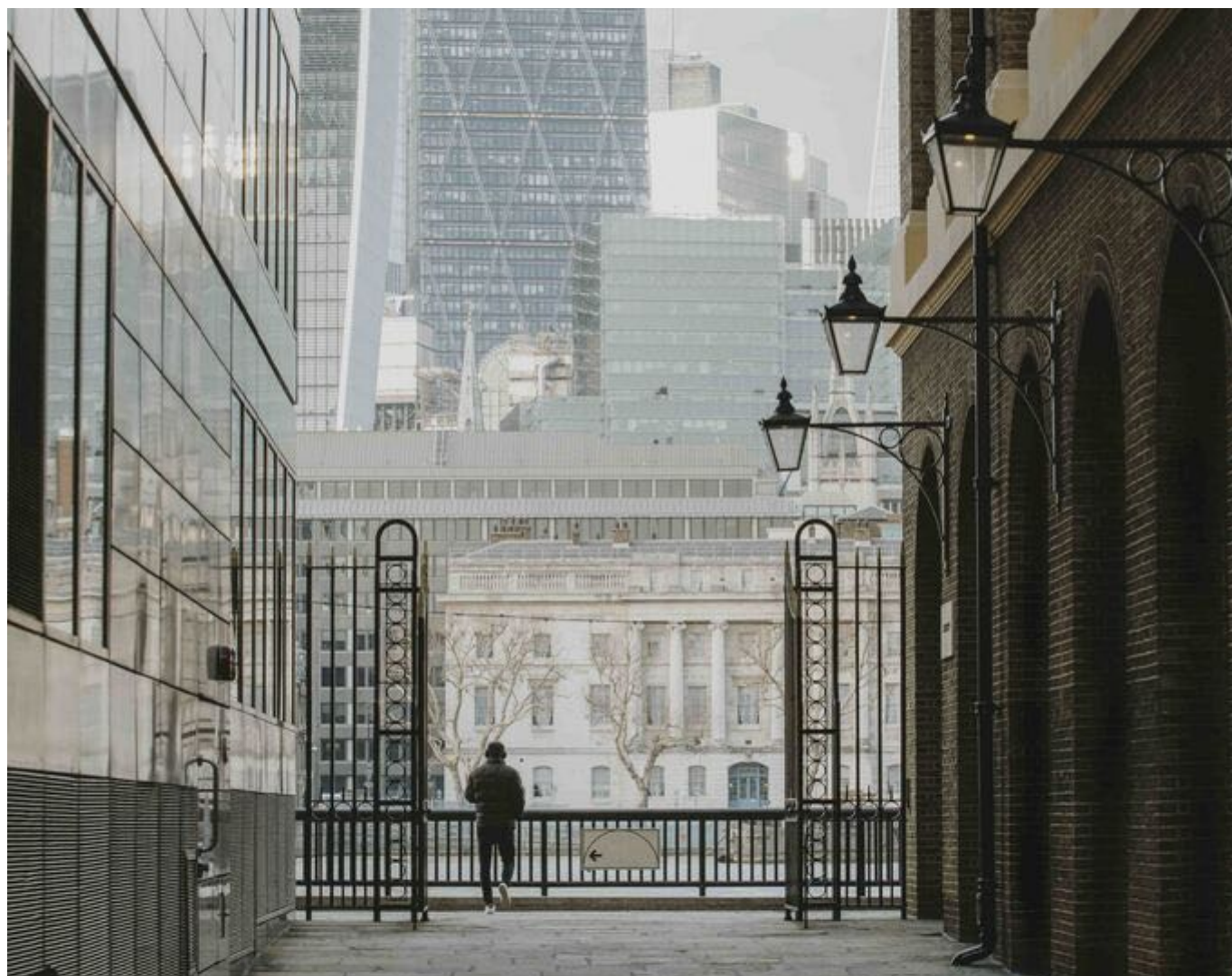
TSB (United Kingdom)

The following table shows the 2030 targets for TSB (UK) in relation to the base year 2023:

CO ₂ emissions reduction targets in UK	Base year 2023		
	Target 2025	% achieved 2025	2030 science-based targets
Scope 1	-21.3%	-37.6%	-65%
Scope 3 (paper), market-based	-	-	-42%
Scope 3 (business travelling, commuting and teleworking), market-based	-	-	-42%

To achieve the stated targets, TSB has identified certain key actions that form part of the plan to reduce its most significant scope 1 emissions (gases, refrigerant gas leaks, and travel using Bank-owned vehicles) and scope 3 emissions (paper consumption, business travelling, and employee commuting to the work centre).

As part of the progress made by Banco Sabadell Group towards GHG emissions neutrality, key actions are being taken in its facilities aimed at reducing emissions in each scope (1, 2 and 3), such as:



Scope 1 - Direct emissions

Actions relating to this scope include those aimed at reducing emissions generated by the consumption of gases and leaks of refrigerant gases in the Group's facilities, as well as by the use of company vehicles.

Fossil fuel gases

In 2025, as a result of the blackout that occurred in Spain in April, which required electric generators to be used in our main corporate buildings, diesel consumption recorded an increase of 77% compared to 2024 and of 81% compared to 2023.

Similarly, in 2025, TSB completed the third phase of its Energy Optimisation Programme, resulting in a -2,084 MWh reduction compared to 2024 in the location-based consumption of fossil fuel gases and electricity. The programme consists of different initiatives, including exploring the phase-out of its fossil fuels, reducing waste generated by its activity, testing out new water-saving technology, finding ways of eliminating paper usage in its processes, and eliminating any non-FSC/ PEFC paper products that remain in its operations.

Action	Geography	Consumption reduction
Energy Optimisation Programme	United Kingdom	-2,084MWh

Refrigerant gases

Refrigerant gas leaks may occur due to breakdowns or faults in the HVAC systems of corporate buildings and branches.

In Spain, to mitigate these leaks, the Bank is implementing a scheme to upgrade its air conditioning equipment, which consists of:

- Increasing the number of annual reviews of each machine.
- Establishing a machine upgrade plan, prioritising machines according to their age, the number of prior incidents, performance requirements, etc.

Company vehicles

During 2025, work continued in Spain to promote the use of energy-efficient vehicles through the company cars plan for executives. Similarly, in the UK, TSB continued to promote sustainable business travel options, offering only electric vehicles in its company cars plan.

Action	Geography	% of fleet 2024	% of fleet 2025	Change
TSB electric vehicles	United Kingdom	93%	98%	+5%

Scope 2 - Indirect emissions

This scope includes emissions generated by the consumption of electric power.

In all of the geographies in which Banco Sabadell Group carries out its activity, 100% of the electricity acquired for use in its facilities has a renewable origin certification.

In Spain, the Institution also has solar panels which, after the installed capacity was expanded in 2024, generate 3.4% of the electricity consumed in the geography, the aim being to triple the current electricity production.

Electricity consumption	2025	2024	Estimated energy use savings (kWh)
Consumption of energy provided by Cepsa, 100% REGO (% supplied out of total electricity consumed)	96.60%	98.50%	
Consumption of electricity provided by other resellers without REGO (% supplied out of total electricity consumed)	0	0	
Spain - Self-generation of electric power through solar panels	3.4%	1.5%	1,339,285

In addition, in Spain, the Bank continues with its ongoing programme to analyse consumption at its branches and corporate buildings to detect changes and actions that will help to improve consumption efficiency:

- The project to replace the lighting at branches with Light Emitting Diode (LED) technology continues, to ensure that they are all equipped with LED lighting and thus reduce consumption (all corporate buildings are already 100% equipped with LED lighting).
- The majority of the branch network is equipped with a centralised low-energy consumption HVAC and lighting system, as well as light activation systems for billboard advertising adapted to daylight hours.
- Corporate buildings are equipped with motion-sensitive lighting systems and LED lights. In these corporate buildings and larger branches, HVAC installations are equipped with energy recovery systems.

Action	Geography	Potential energy impact
Expansion of photovoltaic power plant (CBS Sant Cugat building)	Spain	Production of 1,400 MWh per year

In the United Kingdom, TSB set itself a corporate objective of reducing its overall scope 1 and 2 emissions by 2% compared to the levels in 2023. As at the end of 2025, this reduction stood at -36.3%.

Scope 3 - Other indirect emissions

This scope includes other indirect emissions registered in the following categories:

- 1 - Purchased goods and services (water, paper plastic)
- 5 - Waste generated in operations
- 6 - Business travelling
- 7 - Employee commuting

This section does not consider category 15 – Financed portfolio, details of which are given under the subheading “Emissions of the financed portfolio” in section 2.1.3 “Energy consumption and carbon footprint” of this document.

The remaining scope 3 categories have not been considered material for the purposes of disclosing their emissions.

Purchased goods and services

In relation to eco-efficiency measures, over the last few years the Bank has taken several actions. Among others, bathroom facilities and taps are fitted with water-saving mechanisms. In addition, the headquarters in Sant Cugat del Vallés have a deposit that collects rainwater and greywater for reuse as irrigation water. At the same time, the landscaped areas are comprised of native plants with low irrigation needs.

Water management actions	Geography	Impact on water consumption
Reuse of greywater for third use in irrigation	Spain	Use of up to 90% of greywater and potential 40% reduction of consumption used to water lawns
Reduction of landscaped areas and improvement of irrigation systems in CBS Sant Cugat		

In terms of paper consumption, the Group has continued with the programme to reduce correspondence and simplify contractual documentation, helping to reduce paper consumption. This programme started in 2019, gradually digitalising the profile of customers and consolidating the model under which a single monthly account statement is sent to them.

Paper consumption actions	Perimeter	Consumption reduction vs 2024
Simplification of pre-contractual and contractual documents	Spain	-44 tonnes
Digital solutions for transaction signing, issuance of certificates and correspondence		
Digitalisation of internal operating processes		

On the other hand, the Bank has been applying a series of measures since 2020 designed to eliminate plastic in the products it purchases for various uses:

Plastic consumption actions	Perimeter	Consumption reduction since 2019	Consumption variation since 2024
Elimination of plastic in certain desk and/or common use materials			
Removal of coin blister packs			
Removal of blue bag for documents requiring urgent digitalisation			
Removal of passbook covers			
Replacement of the plastic film in blue event bags with brown kraft paper			
Replacement of plastic coffee spoons with wooden spoons	Spain	reduction of -96% (-68 tonnes)	reduction of -10% (-0.3 tonnes)
Replacement of plastic window in envelopes with transparent paper window			
Manufacture of cash transfer bags with a mixture of recycled (80%) and virgin (20%) plastic			
Manufacture of shrink film from 56% sugar cane (organic material)			
Replacement of corporate pens (100% plastic) with an alternative manufactured with kraft paper and wheatpaste			

Waste generated in operations

Waste can be classified as either non-hazardous waste or hazardous waste. Non-hazardous waste includes scrap metal, inert plastic, bulky general waste, incandescent light bulbs, paper and cardboard, glass, organic waste, grease trap and wood. Hazardous waste includes chemical containers, absorbents (filters), lead batteries, oils, fluorescent lamps, electronic equipment, batteries and aerosols.

The Group has internal procedures in place to ensure that 100% of paper and plastic waste is removed and recycled by authorised waste management firms. Corporate buildings and branches are equipped with facilities for the separation and collection of packaging, organic matter and batteries.

Specific control mechanisms exist for waste management in branches due to be closed or merged. Surplus computer equipment and furniture in good condition at branches or work centres due to be closed or merged are donated by the Bank to NGOs and local charities.

The Bank has planned new actions designed both to reduce inorganic waste and to manage organic waste more efficiently:

Waste management actions	Geography	Estimated annual reduction of waste
New central waste disposal room	Spain	2% per year
Installation of organic waste composting plant		

Business travelling

Company or business travel includes journeys by aeroplane, train and employees' personal vehicles.

At the start of 2020, before the State of Emergency was declared in Spain, the Bank reviewed its business travel policy, laying down new guidelines to limit travel to only journeys strictly necessary due to business needs and to prevent travel for internal meetings, encouraging the use of the remote and electronic solutions available.

For this reason, compared to 2019, as a pre-pandemic reference year, the data for 2025 in Spain reflect the positive effect that the review of the Group's business travel policy has had on the reduction of the Institution's carbon emissions, recording a -43.9% reduction of emissions between both periods.

Employee commuting

Since 2023, the Bank has been calculating the emissions generated during commutes to the corporate buildings with the largest number of employees in Spain.

In relation to these journeys, a sustainable mobility model will continue to be promoted with various schemes, such as the creation of new parking spaces at corporate buildings for private electric vehicles. In addition, TSB has undertaken to promote new alternative means of transport, such as the inclusion in company benefits of an additional grant for the purchase of electric bicycles, as well as new ways of working to keep reducing emissions.

Other actions

In Spain, during 2025 the Bank continued to certify its main corporate buildings with ISO 14001:2015.

Moreover, to mitigate the environmental impact of its suppliers, the Bank continues to encourage the use of electric vehicles for the various logistics services and the use of environmentally friendly ink among the printing companies that collaborate with the Bank.

GHG removals and GHG mitigation projects financed through carbon credits

In 2025, Banco Sabadell renewed its commitment to offset its carbon footprint, including all scope 1, 2 and 3 emissions in Spain, Mexico and the USA, through the purchase of credits in various reforestation projects. In Spain, the project is located in Curiscao y Vegacebrón, in the town of Salas²⁸ in the province of Asturias, and involves the forestation of sparsely vegetated hills with pinus radiata and pinus pinaster pines, at a density of 1,110 feet/ha. It is a tree canopy cover development that will increase biodiversity, as well as the forest load capacity and connectivity, enabling the spread of native vegetation and improving soil conditions. The project also fosters rural employment, improves the landscape and brings agricultural value. In addition, emissions will be offset by purchasing carbon credits in Mexico, specifically in a project in Calakmul²⁹, in the state of Campeche, the main goal of which is to remove CO₂ from the atmosphere by improving forestry management, enhancing the structure of the recovering forest and adding to its value by leaving the best and most economical tree species. Total CO₂ emissions to be offset come to 7,689 tCO₂ equivalent. The carbon credits acquired for offsetting correspond, in the case of Spain, to projects registered with the Ministry for Ecological Transition and the Demographic Challenge (MITECO) and, in the case of projects in Mexico, to those registered with the Climate Action Reserve, endorsed by the International Carbon Reduction and Offset Alliance (ICROA).

TSB, for its part, has offset its scope 1 and 2 emissions generated in 2025, which came to 898 tCO₂ equivalent, through Forest Carbon's ArBolivia reforestation / afforestation project (Plan Vivo).

The Group maintains its commitment to fight against climate change, embodied in its aim of achieving carbon emissions neutrality in its operations, which it undertook upon becoming a member of the Net-Zero Banking Alliance in 2021. It also maintains its GHG reduction targets described under the subheading "Portfolio alignment" in this section.

²⁸ <https://www.miteco.gob.es/content/dam/miteco/es/cambio-climatico/temas/registro-huella/informes/2024-b439.pdf>.

²⁹ <https://thereserve2.apx.com/mymodule/reg/TabDocuments.asp?r=111&ad=Prpt&act=update&type=PRO&aProj=pub&tablename=doc&id1=1505>.

Carbon credits cancelled in the reporting year	2025	2024
Total (tCO ₂ e)	8,587	8,203
Share from removal projects (%)	100%	100%
Share from reduction projects (%)	0%	0%
Recognised quality standard (%)	100%	100%
Share from projects within the EU (%)	72%	73%
Share of carbon credits that qualify as corresponding adjustments (%)	0%	0%

Internal carbon pricing scheme

The Institution has established carbon pricing for emissions from its own operations, which materialises through the offsetting of emissions, maintaining the commitment to offset the carbon footprint including all scope 1, 2 and 3 emissions in Spain, Mexico and the USA and scope 1 and 2 emissions in TSB. The average cost of this offset was c.€20 per metric tonne of CO₂e in 2025.

In addition, with regard to the financed portfolio, the Bank has several pricing mechanisms:

- Discounts are applied for transactions that are aligned with the Sustainable Financing Framework: discounts are applied to financing transactions, taking into account the project, the sector in which the activity or project takes place, the term of the contract, and the environmental, social and governance impact.
 - Green and Social Loans (GSLs): a discount is applied to the final price of finance for eligible transactions/projects/ investments that are aligned with the EU taxonomy and substantially contribute to any of the six taxonomy objectives. The destination of the funds must be traceable and there must be supporting documents and a measurement of the impact.
 - Sustainability-Linked Loans (SLLs) incentivise the achievement of sustainability targets, linking the transaction price to the evolution of certain KPIs. This category does not require the funds to be used for any specific purpose. It is considered essential that the selected indicators be relevant and central for customers, as this enables their sustainability strategy to gain more traction. Every year, customers (legal persons) measure the established KPIs and send the requisite evidence to the Bank, which then proceeds to apply/remove the discount on the transaction according to the level of compliance/non-compliance with the set thresholds.
- Similarly, to embed climate risks into credit risk, the Group has internally developed a methodology for the quantitative assessment of transition risks that is aligned with the three scenarios (Orderly Transition, Disorderly Transition and Hot House World) of the Network for Greening the Financial System (NGFS), adapted to a time horizon of 30 years. These heatmaps, which are developed on a qualitative basis, enable the inclusion of transition risk drivers in the customer base. Accordingly, all the activities of the loan portfolio are classified according to their sensitivity to transition risk, taking into account the impacts envisaged in each scenario in terms of income, low-carbon capex and expenses. In the case of this last point, a direct cost is assigned or considered for greenhouse gas emissions. The estimated impacts of transition risk, together with an advanced assessment of counterparties' performance and attitude in relation to the management of these risks, all affect the climate-related and environmental risk indicator (IRCA), which is a numerical indicator that allows the Bank to rank borrowers according to their impact associated with climate-related and environmental risk. It is worth noting that, at present, for the Large Corporates and Groups portfolio, the IRCA is embedded into the assessment of counterparties, generating an impact on the rating of companies with a low IRCA score, meaning that the assessment already includes a probability of default for each counterparty, with all that that entails.



2.1.2 Managing and monitoring the risks associated with climate change

For the Group, environmental risk is understood to be the risk of incurring losses as a result of the impacts, both those existing at present and those that may exist in the future, of environmental risk factors on counterparties or invested assets, as well as aspects affecting financial institutions as legal entities. These risks have the potential to generate significant impacts for the real economy (institutions and households) through various socio-economic variables, including mortality, migration, job availability and productivity (by extension affecting GDP). Therefore, it is thought that environmental risk could ultimately result in borrowers failing to fulfil their payment obligations as a result of not using assets or of companies experiencing disruptions in their manufacture and supply activities that generate the income used to fulfil payment obligations.

Environmental risks can generate impacts through two 'risk drivers': 'physical factors' and 'transition factors'. There is a trade-off between physical risks and transition risks depending on how and when policies are implemented to facilitate the transition towards a sustainable economy. In particular, where actions to transition are delayed or weak, it is assumed that physical risks will increase. In the same way, where the transition actions and policies are ambitious and premature, transition risk will increase but physical risk can be expected to fall.

Environmental risks are an additional factor included in the Group's Global Risk Management Framework, using the identification and measurement of these risks as a basis for their subsequent integration into management arrangements. The type of environmental risk in which the most progress has been made in terms of analysis and recognition is the risk related to climate change. However, the risk associated with climate change is intricately connected to the risk associated with environmental degradation and both feed into each other.

Climate scenarios and stress testing

Banco Sabadell Group has an internal stress testing framework for climate risk, which lays down the key characteristics of the tests, including their integration in the Internal Capital Adequacy Assessment Process (ICAAP). These tests are posited as a sensitivity analysis exercise.

During these stress tests, forecasts of climate risk are made in order to measure the sensitivity of credit risk to transition and/or physical risks linked to climate change and to possible transition pathways towards a decarbonised economy, as well as the sensitivity to environmental risks, according to the following scenarios:

- Long-term transition risk: this risk is analysed under three scenarios. These three scenarios are built based on estimates by Oxford Economics, as (i) these are similar to the narratives of the NGFS reference scenarios, (ii) they offer a more comprehensive and up-to-date set of variables than the NGFS, and (iii) they offer sector-specific forecasts. The three scenarios are the following:

- **Orderly Transition:** governments implement stringent policies to keep global warming no higher than 1.6°C in 2050, achieving net zero CO₂ emissions by that year. Soaring carbon prices, coupled with investments in technology, drive the transition to low-carbon energy. The pressure from carbon taxes is offset by a surge in investment. The highest taxes generate significant inflationary pressures, but the investment boost and productivity gains associated with lower temperatures help to lessen the economic impact. Tax costs are absorbed by income from carbon taxes and the impact on the economy is moderate.
- **Disorderly Transition:** governments delay efforts to limit global warming until 2030. From that point onwards, they adopt aggressive climate policies, generating substantial inflationary pressures and resulting in stranded assets. Postponing climate action means that drastically improved energy efficiency and a significant expansion of the renewable energy capacity are needed to achieve the climate targets. Given the delay, the transition is relatively incomplete and global temperatures rise by 1.7°C by 2060.
- **Current Policies or Hot House World:** governments fail to deliver on their political commitments and greenhouse gases become more heavily concentrated in the atmosphere. Global warming exceeds 2°C from 2050 onwards, causing severe physical damage over time.

— **Physical risks:**

- **Flooding:** flood risk in Spain is assessed using an indicator showing areas with a potentially significant risk of flooding (called the ARPSI indicator, by its Spanish acronym), as provided by the Ministry for Ecological Transition (MITECO), which is projected until 2050 under a Current Policies scenario, also analysing the impact of that risk on the value of real estate assets.
- **Forest fires:** the risk of forest fires in Spain is assessed using data published by the European Forest Fire Information System (EFFIS), projected until 2050 under a Current Policies scenario, also analysing the impact of that risk on the value of real estate assets.

— **Short-term physical and transition risks:**

- **Diverging Realities:** advanced economies pursue a transition towards net-zero emissions, in line with the Paris Agreement. The rest of the world suffers a series of extreme weather events, whose economic consequences are felt across the globe through trade and financial links. Disruptions in the supply chains of critical commodities indirectly affect the advanced economies and raise the cost of their transition to a low-carbon economy.
- **Disasters and Policy Stagnation:** a sequence of region-specific extreme weather events occurring in 2026 and 2027 results in capital destruction, loss of productivity and production, and creates cascading economic impacts. Trade and financial linkages spread the negative impacts across the world, amplifying financial and economic instability.
- **Droughts and heatwaves:** as this is an acute physical risk, the first year of the Disasters and Policy Stagnation scenario is used to analyse the effect of a drought on the Spanish economy.

- **Environmental risk:** the NGFS includes soil erosion and the availability of running water as possible environmental risks. As water stress and desertification complement the other physical risks analysed, and given their potential impact for Spain, these have also been included within environmental risk. Projections cover the 2026-2050 horizon and mainly capture the impact of this risk on productive activity.

The stress tests are conducted on the Group's main institution (Banco Sabadell) and for its mortgage lending and business lending exposures. Sensitivity is measured by comparing the impact on provisions of the various scenarios under analysis, considering to that end the impact of climate-related and environmental risk on probability of default, on loss given default, on the value of collateral, and on the accounting classification of transactions.

In addition, sensitivity to transition risk is measured by considering expected changes in the exposure's breakdown by sectors until 2050, or the breakdown by energy efficiency level in the case of the mortgage book, which is consistent with the transition scenario provided and with the Bank's sustainability targets.

To conduct these forward-looking measurements, the Bank has forecasting models that allow it to embed the direct and indirect effects of climate risks into its Probability of Default (PD) and Loss Given Default (LGD) calculations.

- Indirect effects: these effects relate to the state of the economy in general and they are captured by parameters through top-down estimates. This makes it possible to capture cross-cutting and sector-specific effects on PD, and allows the impact on LGD to be reflected as changes in its components (likelihood of becoming re-performing, or of being written off, etc.).
- Direct effects: at present, the direct effects are reflected in the PD of business banking portfolios through the use of bottom-up estimates, which complement the top-down measurements. These estimates are made at the borrower level when sufficient information is available and they make it possible to capture both the impact that the economic environment can have on the financial statements of a particular borrower, and how the borrower's profitability and debt levels will be affected if they need to bear any costs due to the intensity of their CO₂ emissions, or if they need to make an investment to decarbonise.

In the mortgage portfolios (of both business banking and retail banking customers), the direct effects are embedded into LGD both through the exposure of the collateral to physical risks and through the impact that the transition to a decarbonised economy, in which less energy-efficient properties have less market appeal, could have on the valuation of the collateral.

Banco Sabadell is currently working to continuously improve these forecasting methodologies, with the aim of updating them and improving them with more available data and with cumulative experience and knowledge about them.

The results of the climate risk stress tests are included in the ICAAP in order to evaluate the impact that those risks could have on the Group's solvency from the point of view of expected loss on one hand and of unexpected loss on the other, by measuring how much economic capital is required at the Group level to cover any losses that are reasonably likely to materialise due to these risks. The impact of physical and transition risks on the Group's solvency position is limited, from both a regulatory perspective and an internal perspective. The measurement of economic capital, which is made at the Group level and considers the climate risk sensitivities used in stress tests, shows that the economic capital requirements for this risk are around 1% of total economic capital requirements, meaning that the risk has a limited impact on the Group's solvency, particularly considering the time horizon over which it materialises.

Identification and assessment of risks related to climate change

Banco Sabadell considers its interactions with the environment based on the concept of double materiality, which includes both financial materiality, which focuses on identifying and assessing risks and opportunities, and impact materiality, which focuses on evaluating and measuring the potential and current impacts of Banco Sabadell on the environment.

In addition, in this analysis Banco Sabadell considers whether these materialise in any of the three stages of the Bank's value chain (upstream, own operations, and downstream).

From the point of view of impacts, the Bank considers greenhouse gas (GHG) emissions, taking into account both those produced in its own operations and those that occur in other stages of the value chain and, in particular, in the financed portfolio, which represents one of the largest categories of the Institution's GHG inventory.

From a financial standpoint, the business opportunities offered by the transition to a greener economy (detailed in section 1.4 "Sustainability strategy and business model") are considered, together with climate risks, particularly those to which the Bank's credit portfolio is exposed given the characteristics of its borrowers.

In this respect, the Group identifies environmental risks (those related to climate and environmental degradation) according to whether they are transition risks or physical risks. Specifically, climate-related risks are measured broken down by transition and physical drivers, while risks associated with environmental degradation (other non-climate-related factors) are measured in aggregate form, without distinguishing between the nature of the drivers in question (transition or physical).



Physical climate risks

Physical climate risks are those that emerge as a result of climate events. They can be categorised as either acute risks or chronic risks. Physical risks could lead to a number of consequences, among them the destruction or disuse of physical assets, as well as business disruption, in turn leading to the risk of collateral losing value due to the impeachment for waste of the commercial or residential properties securing the loans. The following physical factors or 'physical risks' have been identified (this list is not exhaustive):

Factors		Possible impacts
Acute	Increased severity of extreme weather events, such as (i) heatwaves (ii) cold snaps, (iii) forest fires, (iv) cyclones / hurricanes / typhoons / storms / tornadoes, (v) droughts, (vi) heavy rainfall, (vii) flooding, and (viii) landslides and subsidence.	Reduction of income due to reduced production capability (e.g. standstills in production, in the supply chain or transportation difficulties). Direct losses due to damage to assets.
Chronic	Changes in rainfall patterns and extreme climate variability. Impacts on exposures with sensitivity to (i) changing average temperatures, (ii) heat stress and thawing of permafrost, (iii) changing wind patterns, (iv) changing patterns and amounts of rainfall, (v) water stress, (vi) land and coastal erosion, (vii) land degradation and (viii) rising sea levels. Gradual loss of ecosystem services (water and food production, climate control and disease prevention, support for the pollination of crops and cultural benefits).	Loss of value of customers' assets serving as guarantees due to their being located in areas affected by these risks (desertification, rising temperatures, rising sea levels, among others). Loss of productivity among business customers due to effects on production centres (more frequent breaks from work due to higher temperatures, rising sea levels, among others). Decline of production and/or profitability of customers who depend on ecosystem services.



Following this definition, Banco Sabadell Group has conducted a top-down estimation of the impacts stemming from these climate events on its loan portfolio in Spain taking into account:

- **The probability of occurrence of physical risk:** probabilities have been assigned using climate event risk maps. For each event, the probability of occurrence in each postcode is estimated, based on historical data gathered from public sources (i.e. European Forest Fire Information System (EFFIS) data is used for forest fires, which uses data from the European satellite Copernicus, etc.). This makes it possible to assess the probability of occurrence of events that could have a more significant impact on the portfolio, based on the location and activities of customers. Using this data, the Group has identified a total of 16 events (8 acute and 8 chronic) that could affect the loan portfolio, having calculated a probability of occurrence for 12 of them in the Spanish portfolio: Floods, Forest fires, Rising sea levels, Droughts, Water stress, Hot spots, Landslides, Heatwaves, Minimum temperatures, Rainfall and thaws, Fog and airborne dust, Storms, winds and gales.
- **The severity of those risks should they occur:** understood as the impact if physical risk were to materialise, estimated according to expert criteria at a sectoral level for the business lending portfolio and in terms of the location of the collateral for the mortgage portfolio. In 2025, the Institution has further developed its physical risk model, expanding the set of climate events considered in the severity analysis. In addition to the events already evaluated previously (coastal floods, riverine floods, forest fires and droughts), water stress and heatwaves have been introduced, in response to their growing materiality and potential to affect the credit portfolio. The final score adds the impact of these six climate events, to which a severity calculation has been applied given their materiality in terms of possible losses of both corporate earnings and collateral value, thereby strengthening the Institution's ability to anticipate and deal with the effects of physical risk on its portfolios.
 - In the case of physical business risk, the severity of the events represents the percentage of revenues that a company could lose if that event were to occur, due to its business coming to a standstill. Therefore, depending on the type of activity in which the company engages, different events can have different effects on borrowers, which is why the severity is defined based on the event and the activity according to Spain's classification of economic activities (CNAE). In 2025, the granularity of severity calculations for each climate event and economic sector has been improved, adopting a more in-depth approach through assessments broken down by sub-sector, where this provides a more valuable measurement. This approach weights the average severity in each sector according to distinguishing elements, especially in sub-sectors with uneven climate impacts, such as agriculture, livestock farming and fishing, the chemical sector, and electricity, gas & water.
 - In the case of physical collateral risk, the severity is the percentage of the collateral value that could be lost if the event took place. In this case, the severity does not depend on the borrower's activity, so all mortgage contracts have been treated the same way, regardless of the type of property securing the loan.

The probability of occurrence of each event is multiplied by its severity and these figures are added together to give the expected impacts, which are the basis for creating physical risk indicators:

$$\text{Expected impact} = \sum (\text{Event probability of occurrence} \times \text{Event severity})$$

This way, for each loan granted to businesses with a Spanish postcode and for each mortgage contract secured with real estate, the physical risk can be classified as either "None", "Low", "Moderate", "High" or "Very High".

In addition, the Group has internally developed a methodology that distinguishes between acute and chronic events in line with the three scenarios (Orderly Transition, Disorderly Transition and Hot House World) of the Network for Greening the Financial System (NGFS)³⁰, adapted to a time horizon of 30 years. These risks are being monitored regularly and meticulously under the Orderly Transition scenario, as this is considered the most likely scenario, although these monitoring exercises do also include the overall impact under the worst-case scenario (Hot House World). This analysis measures the risk inherent in the portfolio and not the residual risk, as it does not consider the existence of cover, such as home insurance and/or the existence of the Spanish Insurance Compensation Consortium (Consortio de Compensación de Seguros), among other things.

It is also worth highlighting that in 2023, the Institution took a significant step forward in the measurement of physical risk and its integration in management arrangements, developing a bottom-up analytical methodology for the main counterparties at the level of large

³⁰ For more information about the scenarios used, see section "Climate scenarios and stress testing" of this chapter.

corporates, as these are thought to be more complex and deserving of a complementary specific analysis. This way, for those counterparties, the Bank conducts a more in-depth expert analysis in cases where this is considered necessary, and can provide more information to the Bank's top-down model. This analysis is carried out using public information about the customer, the internal physical risks model and the expertise of the Bank's ESG analysts, taking into consideration, among other things, the counterparty's reliance on physical assets, the geographical diversification of their production centres and their activities, and the controls currently in place to mitigate and/or reduce these risks.

In 2024, another significant improvement was made, with the development of capabilities to use geo-referenced data management software to measure the physical risks linked to the riverine flooding, coastal flooding and forest fire events in Spain for locations with different geographical coordinates. This improvement has been applied to 89% of the mortgage-secured loan portfolio in the country for which coordinate-based locations are available, which has significantly improved the granularity of the prediction and the quantitative assessment of the potential impacts of these events. In 2025, for the first time, the Institution has calculated new probabilities of occurrence for riverine and coastal flooding events at the postcode level, using the QGIS cartography tool to cross the maps of flood-prone regions provided by MITECO with an extra layer showing postcodes in Spain, in order to calculate the percentage surface area of each postcode that is located in a flood-prone area.

In addition, as mentioned previously, in 2025 a specific severity calculation has been included for the heatwave and water stress events, thereby reinforcing the model's ability to capture physical risks that are becoming increasingly material for the credit portfolio. It should be noted that, by including these two events, the Institution covers all significant events given the sectoral and/or geographical composition of its loan book. Similarly, as indicated, the granularity of the severity calculations of each climate event and economic sector has been improved, breaking it down by sub-sector where this provides a more valuable measurement, especially in those where the climate impacts are very uneven.

The Group also continues to work on measuring physical risk in the different geographies in which it is present, through the Bank's task forces with teams at the various foreign branches. First, based on companies' activities, those likely to be more severely affected should any of the events occur were selected before proceeding to evaluate the probability of occurrence of the events, thanks to the expert knowledge about the location and the climate reality of each country, in a manner that is consistent and coordinated with the methodology applied in Spain and described above. Similarly, in relation to TSB, bearing in mind that its credit book mainly comprises mortgage assets, a model analogous to the top-down model defined above was applied, albeit considering the specific characteristics of its geography, where the main physical risks are flooding, subsidence and coastal erosion.

The physical risk assessment is also complemented with a deep dive into certain high-impact climate events, improving the understanding and management of the exposures concerned. In 2023, following the droughts that occurred in Spain, an analysis of how that event was dealt with and of its potential impact on the loan book was carried out. The loan book was analysed to determine the quality of the Bank's exposure in this sector and to take a closer look at possible additional mitigating techniques (e.g. the agricultural insurance taken out by companies) and, using all this information, an action and monitoring plan was devised for these companies by the Bank.

In 2024, as a result of the acute flash floods caused by the DANA storm in Valencia, the granularity improvements at the level of individual geographical coordinates mentioned previously were put into practice for the very first time. This made it possible to anticipate the potential impact of the event on the credit portfolio and to more precisely manage the risks

associated with customers, of both the Business Banking and Retail banking segments, located in the affected regions.

In 2025, after the forest fires that took place in August in the west of Spain, an in-depth evaluation of the potentially affected exposures was carried out. Using the maps of burnt areas provided by the Copernicus EMS satellite mapping service, as well as geospatial analysis tools such as QGIS, the percentage of burnt land in each postcode was calculated, identifying the credit exposure, as at the end of July, of both Business Banking and Retail Banking customers in the postcodes containing burnt areas. As a result of this exercise, it was concluded that the Institution's exposure in the postcodes affected by the wildfires is limited. The Business Banking portfolio has a low concentration at the level of both companies and activities, and it has been verified that the vast majority of the real estate properties held in both the Business Banking and Retail Banking portfolios is located in urban areas that have had no direct contact with the wildfires.

The coordinate-based assessment for events of this kind evinced the importance of granularity in the measurement, as the very terrain or distribution of towns means that the same event can and does impact different properties in the same location in different ways.

Conclusions of the physical risk measurement analysis

Taking all of the above into consideration, the most prominent physical risks in the portfolio in Spain are forest fires, droughts, floods resulting from severe storms, as well as coastal floods and/or rising sea levels, water stress, and heatwaves.

Using the aforesaid methodology, the Bank's exposure³¹ in Spain associated with physical risk is as follows:

- Business Banking portfolio: 0.1% is associated with "Very High" risk and 7% with "High" risk. Compared to the previous year, the exposure impacted by physical risks has fallen from 10.2% to 7.1%. Although the exposure to physical risks increased in early 2025 after water stress and heatwave events were added to the model in Spain, this increase was offset by a series of methodological improvements, among them the more granular calculations of the probability of occurrence of flood events, which helped to reduce the exposures rated as having a High or Very High physical risk.
- In the collateral portfolio, the exposure expected to have an annual impact on the collateral valuations of over 5%, which is therefore classified as High risk, has fallen from 5% in 2024 to 3.3% in 2025, also as a result of the aforementioned methodological improvements. Similarly, the percentage of the portfolio not expected to be affected by these events has remained steady, at 69% compared to 70% in 2024.

In addition, physical risk also varies depending on the sector, as mentioned in the description of the severity of the impact should an event materialise. The sectors most sensitive to this risk are productive sectors such as agriculture, livestock farming and fishing; hotels and tourist accommodation; and real estate development.

As for the subsidiary TSB, located in the United Kingdom, taking into account that its credit book mainly comprises mortgage assets, and also considering the specific characteristics of that geography, the main physical risks are flooding, subsidence and coastal erosion, while in the case of Mexico and Miami (United States), the potential impact of hurricanes is considered.

0.1%

Physical risk in the business portfolio 'Very High'

7%

Physical risk in the corporates portfolio 'High'

³¹ Exposure means the amount drawn down and contingent risks in the loan book.

To ensure physical risks are supervised, they are monitored on a quarterly basis and reported to the Bank's Sustainability Committee and to its Technical Risk Committee³².

Climate transition risks

Transition risks are those that occur due to the uncertainty associated with the timing and speed of the process of adjusting to an environmentally sustainable economy. This process can be affected by four factors:

Factors	Possible impacts	
Policy & Legal	Increase in the cost of emissions or the use of natural resources.	Risk of borrowers failing to fulfil their payment obligations, particularly those with non-performing assets or belonging to sectors particularly exposed to transition risks.
	Increase in requirements concerning the monitoring, control and reporting of climate-related and environmental disclosures.	Increase in resources dedicated to the analysis, reporting and integration of transition and environmental protection plans in companies' activity. Potential increase in regulatory capital requirements for risks associated with climate change.
	Changes in regulations of existing products and services.	Forecast increase in environmental demands going forward and lack of preparation in some sectors.
Technology (ICT)	Substitution of existing products and services with other more efficient or less polluting ones.	Risk of companies being pushed out of their respective activities due to a lack of innovation or failure to adopt technologies that promote the green transition, compared to competitors.
	Failed investment in new technologies. Costs of transitioning to low-emissions technologies.	Technological changes depend on the availability of technology, in turn associated with investment in R&D, meaning that this aspect will determine the survival of some companies, especially those smaller in size.
Market	Changes in consumer preferences and/or tastes in relation to the transition to a more sustainable economy.	Risk of losing market share as a result of failing to offer sustainable products or due to poor ESG performance.
	Increased cost of raw materials.	Reduction of income due to increased costs of raw materials in certain carbon-intensive sectors.
Reputational	Stigmatisation of a sector, company or product.	Loss of customers' solvency due to poor reputation as a result of the lack of a sustainable strategy or due to an incident or poor ESG ratings of a third party.
	Investment exclusions in certain sectors due to market pressures.	Loss of confidence among the general public.

Analysis of climate transition risk in the business portfolio

Banco Sabadell Group has internally developed several heatmaps at the sub-sector level, aligned with the three scenarios (Orderly Transition, Disorderly Transition and Hot House World) of the Network for Greening the Financial System (NGFS)³³ and the recommendations of UNEP FI and adapted to a time horizon spanning 30 years.

³² Details of the attributions of management bodies in relation to climate-related matters are provided in chapter [1.3.1 Sustainability governance](#).

³³ For more information about the scenarios used, see section "Climate scenarios and stress testing" of this chapter.

These risks are being monitored regularly and meticulously under the Orderly Transition scenario, which is considered the most likely scenario. However, these monitoring exercises do also include the overall impact under the worst-case scenario (Hot House World).

Based on this, all the activities of the loan portfolio have been classified according to their sensitivity to climate transition risk under a top-down analytical approach and taking into consideration the impacts envisaged in each scenario in terms of income, costs and low-carbon capex.

It is worth noting that the heatmaps are continuously updated in order to obtain the impacts stemming from transition risk with a greater level of granularity. The Bank therefore currently has the capacity to identify the transition risk of each separate activity within a single sector. This is important for sectors involving a variety of activities that differ considerably in terms of emissions. For example, cattle rearing and rice growing, which both form part of the agriculture and livestock farming sector, are associated with higher levels of emissions intensity than the other activities within that sector.

In the case of transition risk, the total impact considers the impact broken down by income, costs and low-carbon capex. Impacts are classified as “Positive” for activities in which the transition could have a positive effect on one or more parameters, as “No Risk”, “Low”, “Moderately Low”, “Moderate”, “Moderately High”, or as “High”, which includes, for instance, the activities most affected by transition risk, such as coking plants. This impact analysis measures the inherent risk of the portfolio and not the residual risk, as the controls that each counterparty currently has in place to mitigate it are not considered.

Example of how transition risk is integrated in management arrangements: bottom-up analysis of large borrowers

To measure transition risk and embed it into management arrangements, the Institution includes the bottom-up analyses conducted when evaluating the advanced climate-related and environmental risk indicator (IRCA) in the batch measurement model. This makes it possible to expand the volume of counterparties for which a more exhaustive expert ESG analysis takes place, providing additional information for the Bank’s model.

The advanced IRCA is a standardised internal methodology used to measure climate-related and environmental risk in counterparties that are large corporates, whose complexity requires a complementary specific analysis. This analysis is broken down into each of its constituent parts, one of which is transition risk. This way, the Bank conducts more in-depth expert analyses for cases where it is thought that this will be beneficial, providing more information to the Bank’s top-down model.

This transition risk assessment is conducted using the customer’s publicly available information, the internal transition risk model and the expertise of the Bank’s ESG analysts, taking into consideration the IRCA methodology.

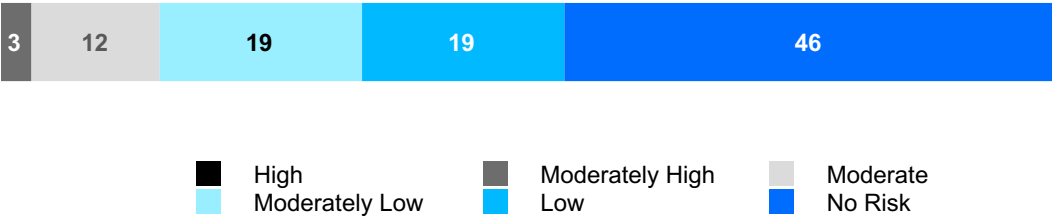
To effectively integrate these results into management arrangements, this methodology has been defined in line with the top-down model, so that its outputs can be integrated in a coherent way and feed into each other.

This process has resulted in an improved methodology for measuring the portfolio’s transition risk, as borrowers are now evaluated in more detail.

Conclusions of the transition risk assessment:

Based on everything mentioned thus far, the Group’s most affected portfolio is its business portfolio, although as shown in the chart, it is currently thought that the Bank has minimal exposure³⁴ (around 0.01%) to the segment with the highest transition risk (“High”).

Breakdown of transition risk exposure in business lending portfolio (%)

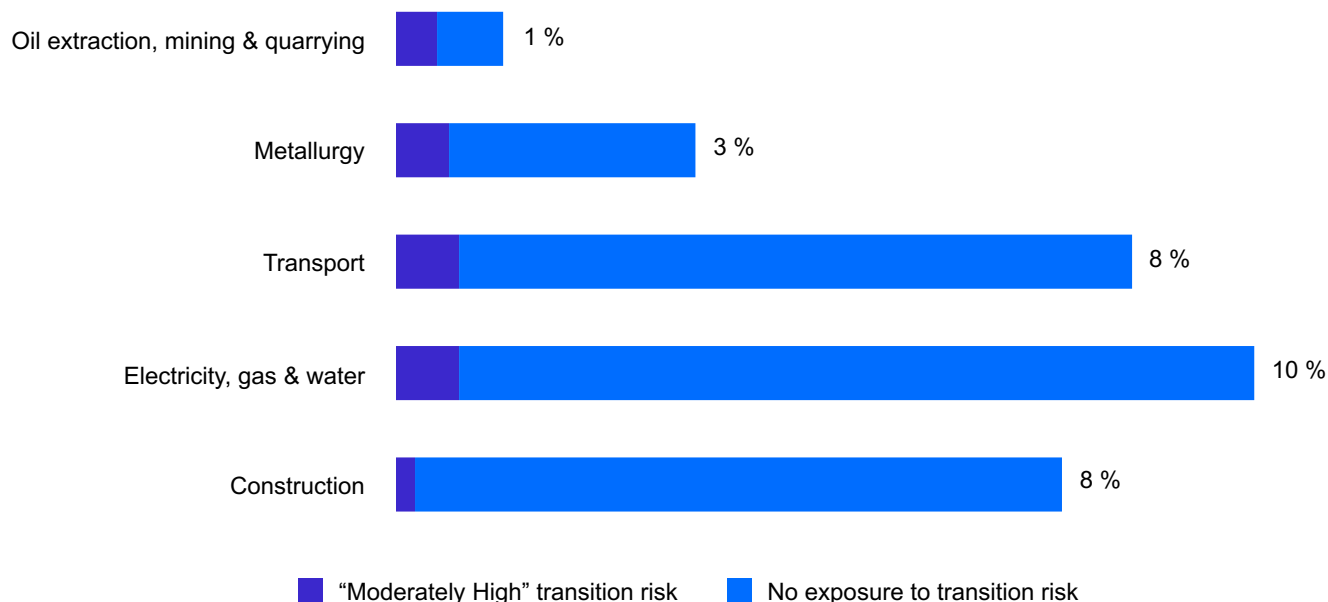


Transition risk in 2025 has remained broadly stable, although it is worth mentioning the 1% increase in the “Low” and “Moderately Low” categories and the 1% reduction in the “No Risk” and “Moderate” categories.

This exercise also cast light on the limited weight of sectors with higher transition risk (aviation, shipping, mining, automotive, and oil extraction, mining & quarrying), which are secondary in terms of exposure within the Institution’s portfolio.

The five industries that account for the majority of the transition risk in the business portfolio are shown below, along with the proportion of the transition risk exposure rated “Moderately High” relative to the total for that sector (“Exposure to categories with lower transition risk”). At the same time, the percentage indicates the weight of the sector³⁵ in the Bank’s credit book:

³⁴ Exposure means the amount drawn down and contingent risks in the loan book.
³⁵ The percentage is calculated taking into account the amount drawn down, including contingent risks, in the sector relative to the total amount drawn down in the loan book.



As can be seen in the figure, the Bank's level of exposure to sectors with "Moderately High" transition risk is limited. It is also worth noting the high percentage of the exposure classified as green within the electricity generation sector, due to the Institution's ability to spearhead the financing of renewables, which allows it to have a portfolio with a lower transition risk than one would expect for a carbon-intensive industry.

Analysis of climate transition risks in the collateral portfolio:

The transition risk associated with real estate properties financed by the Bank (mortgage loans) is measured differently from business risk. Specifically, it is evaluated based on the properties' energy efficiency, which is measured using Energy Performance Certificates (EPCs).

It should be noted that the Bank is continuously working to collect the largest amount of data possible about the EPC ratings of properties (commercial real estate with residential use and residential real estate), both in its mortgage book and in its collateral portfolio, as well as foreclosed assets. It is worth mentioning that, depending on the type of property, the issuance of an EPC may not be mandatory, as is the case with garages, sheds, building plots and warehouses, for which no energy-related data is available.

The Bank has an EPC rating for practically all the properties in its eligible portfolio, as a result of the efforts made to obtain the actual certificates, where they exist, and to estimate the ratings through a reputable third party where no EPC rating exists due to aspects related to the practical application of the regulation.

In this respect, the Bank prioritises the collection of actual EPC ratings for financed properties, based on data provided by the customer or taken from public databases (such as those of Autonomous Communities in Spain). To identify or, where necessary, estimate the energy rating of properties located in Spain, four mechanisms have been established to obtain that data (the first being the one with the highest quality):

- a. First mechanism: obtain data based on the Energy Performance Certificate (EPC).
- b. Second mechanism: obtain data by directly looking up the property in question on the public databases of Energy Performance Certificates (EPCs) of the Autonomous Communities.
- c. Third mechanism: used where it has not been possible to obtain data using the previous two mechanisms, it consists of obtaining data for the property based on its similarity to other properties that do have an EPC rating and are located in the same building.
- d. Fourth mechanism: used where none of the previous mechanisms have yielded the requisite data, it consists of making an estimate using a model created by the supplier. The estimation model was built based on information taken from the more than four million EPC ratings included in the records of Autonomous Communities. It is a model that assigns a rating to properties, considering the information included in land registers (type, age, building regulations, construction quality, surface area and relative height), as well as the climate zone in which they are located. It is not a statistical or regressive model, but instead an expert replica of accredited programmes used to calculate EPC ratings, pooling data for each item included in the certificates and estimating the rating using the limited information available about the properties.

The supplier's model was supervised by an external auditor with the primary aim of verifying that the model allows requirements to be met. The report concluded, generally speaking and based on the tests carried out, that the information used and the procedure developed to obtain and estimate EPC ratings is adequate.

Outside of Spain:

- In the United Kingdom, estimated EPC ratings are completed based on average estimated ratings of postcodes, where available. Where they are not available, the outputs of a regression model are used.
- In Mexico, a model for estimating EPC ratings and energy consumption (KWh/m²) provided by an external supplier has been used.

In the case of TSB, its credit book is almost entirely made up of mortgages, with an average energy performance. Given that practically all of the portfolio is made up of mortgages, almost all of TSB's transition risks come from the energy performance of the properties used to secure mortgage loans and from the cost of improving their energy efficiency rating (in the short, medium and long term).

Lastly, it is worth noting that EPC ratings are regulated by European Directives and are not mandatory outside of Europe. In addition, the Directives are general frameworks used to define EPCs, but each country is responsible for specifying and defining the associated technical requirements in their own domestic regulations, according to the particularities of each region. This is why, although the same classification system is used, the same EPC rating in two separate European countries does not reflect the same impact in terms of energy consumption and emissions, so they are not thought to be comparable.

To ensure transition risks are monitored, they are tracked on a quarterly basis and reports are sent to the Bank's Sustainability Committee and to its Technical Risk Committee³⁶.

³⁶ Details of the attributions of management bodies in relation to climate-related matters are provided in chapter [1.3.1 Sustainability governance](#).

Management of risks related to climate change

An effective integration of environmental risks into management arrangements requires a strategy and set of regulations that establish the action guidelines, targets and limits required at different points of the credit approval workflow. To that end, the Bank has created a robust regulatory framework articulated through its ESG credit risk management guidelines.

These guidelines consolidate the ESG commitments and standards currently applied to the origination of credit transactions, and they comprise the Environmental and Social Risk Framework, the advanced IRCA, and the decarbonisation pathways. The evaluation of the level of compliance with the ESG credit risk guidelines has been embedded into the advanced IRCA evaluation process, meaning that, when ESG analysts receive a loan application from a customer who is subject to the advanced IRCA analysis, they conduct an additional evaluation of their compliance with the Environmental and Social Risk Framework, where the Sectoral Rules are included, and of their decarbonisation pathways.



ESG credit risk management guidelines

As planned, a single framework has been developed to manage ESG credit risk, which incorporates all standards on this topic that apply to the authorisation of Bank's credit transactions, notably the following:

1. **Environmental and Social Risk Framework** at the customer level, to identify from the outset whether a new transaction could be associated with any of the restricted activities.

Specifically, Banco Sabadell Group has a public framework of environmental and social risks that is applicable to new loan transactions granted to groups or companies with turnover in excess of 40 million euros³⁷. This framework consolidates the set of applicable criteria that aim to limit the financing of customers or projects that are thought to be contrary to the transition to a sustainable economy or that lack alignment with international regulations or best practices in the sector.

This framework lays down general criteria and specific criteria applicable at either the customer or project level:

- General applicable criteria, which have a cross-cutting impact on all sectors, follow international standards such as the Global Compact and the principles of the International Labour Organization (ILO), among others.
- Specific applicable criteria affect businesses or projects in particular sectors (mining, energy, agriculture, infrastructure and defence), due to their potentially negative impact on the environment and/or society, in which the Group provides services and/or offers financial products.

The rules that make up the current framework are all approved and implemented in the Bank's systems. The analysis of these rules is effectively integrated in the usual customer onboarding, transaction origination, and new product approval processes. To ensure this correct implementation, the Bank has included in its onboarding process (the risk management record process) the automatic identification of transactions subject to the framework and which require a compliance analysis. The ESG analysts in charge of conducting these analyses have a specialised tool for screening any disputes associated with the counterparties, which is backed by the services provided by a reputable third-party supplier³⁸.

The Environmental and Social Risk Framework has been implemented in phases in order to adapt the applicable criteria to the trends of the various sectors, the regulatory and economic environment, and the Bank's performance.

The full content of the framework, as well as its phased implementation, was approved by the Management Committee in January 2023, following submission to the Sustainability Committee for information in January of that same year.

In the specific case of Banco Sabadell Mexico, as part of the Environmental and Social Policy, the Institution has developed the Environmental and Social Risk Management System (Sistema de Administración de Riesgos Ambientales y Sociales, or SARAS), which serves as a guide to promote sustainable economic growth through the identification, assessment and management of any environmental and social risks arising from its activities and financed projects. This system is fully aligned with the operational and credit processes of Banco Sabadell Group, national laws and international standards. Application of the SARAS process is mandatory for the infrastructure projects of the various sectors financed by Banco Sabadell Mexico with traditional loans, syndicated loans and financial intermediaries amounting to 5 million US dollars or more.

³⁷ At the customer level, restrictions will be considered whenever customers apply for finance of over €25m. In the case of projects, restrictions will be considered for transaction amounts of over €5m.

³⁸ An external tool has been acquired for research, ratings and collection of analytical data concerning performance in Environmental, Social and Governance (ESG) topics for companies.

2. **Advanced IRCA:** this is an indicator that allows the Institution to screen the ESG risk of the firms to which it provides finance. It offers an objective assessment of large corporates with sustainability disclosures, based both on their exposure to climate-related and environmental degradation risks and on the maturity of their ESG management arrangements. This indicator is used to define credit risk management policies and to identify potential opportunities for investment to support emissions-intensive companies in their transition towards more sustainable activities.

The advanced IRCA is based on an integrated and modular evaluation that considers transition risks, physical risks and environmental degradation risks, as well as the existence of any controversies or disputes of an environmental nature, but also more especially of a social or governance nature, involving the counterparties. Thus, although the risks inherent in the activity of each borrower are considered, these are adjusted according to the maturity of their ESG management arrangements. To that end, various factors are analysed, such as the decarbonisation strategy, the trend of emissions, the management of ESG risks, and the commitments to reduce emissions. In line with this description, three main modules can be identified:

1. Climate risk: each borrower is assigned a score for the transition risk and physical risk inherent in their activity. To distinguish between different borrowers within a given sector according to their management maturity level, ESG analysts evaluate the efforts made to transition and to mitigate physical risks, applying an internal methodology that has been standardised in order to make the results comparable. This way, the climate risk associated with a given activity by default can be adjusted based on each analysed borrower's level of maturity in managing those aspects. Looking at the evaluation in further detail:
 - 1.1. Transition efforts are measured using a methodology that measures the management maturity of these aspects, in line with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD), meaning that this part of the assessment evaluates topics aligned with the four thematic areas defined in the recommendations: Governance, Risk management, Strategy, and Metrics and targets.
 - 1.2. The efforts made to mitigate physical risks are also measured following the TCFD's recommendations, requesting details of any physical events experienced by the borrower and of the measures taken to mitigate risks and adapt to physical events (e.g. insurance). A big step forward has been taken in relation to this measurement (as mentioned in the section on "Physical climate risks"), defining a bottom-up analytical methodology for large corporates, to be conducted by a central pool of analysts specialising in ESG.
2. Environmental degradation risk: a module has been introduced to adjust borrowers' climate risk according to the impact inherent in the other environmental factors, other than climate factors, of the activities they perform. The adjustment stemming from this risk can be broken down to ascertain the impact associated with each vector (air quality, water quality, soil quality, waste and biodiversity).
3. Disputes: lastly, the counterparty's score based on environmental modules (climate and environmental degradation) undergoes a second adjustment to determine the presence of any significant disputes in connection with counterparties relating to the environment and also relating to social or governance aspects.

This methodology results in a numerical indicator that can be used to rank companies according to their ESG score in a uniform, objective and comparable way.

Lower scores correspond to higher climate-related and environmental risk, while higher scores are associated with companies engaging in activities with a low (or even positive) impact on climate and the environment, as well as those with high ESG performance and/or maturity levels. This information concerns the ratings assigned to large corporates under the internal methodology, through an adjustment based on the IRCA score, and the existence of significant unmitigated disputes or controversies.

The IRCA's modular structure also allows separate scores to be obtained for each module (climate, environmental degradation and disputes), so as to compare specific aspects of borrowers.

The IRCA is calculated centrally through the Bank's internal portal, where the full analysis of borrowers is added, along with any relevant supporting documents, so as to ensure the correct traceability of opinions related to ESG criteria for credit risk decisions. Information is collected through a centralised pool of analysts specialised in ESG. The information collected mainly comes from public sources and is preferably checked and verified by a third party. In addition, where the ESG pool considers it necessary to do so, it instructs the basic management team to contact companies to obtain additional information. This process takes place annually for existing customers and during the origination process in the case of new customers.

At present, the advanced IRCA has been calculated for large corporates in the case of more than half of the portfolio of loans granted to large corporates, and it is worth calling attention to the strong presence of borrowers with top-class ESG performance in their sector.

Lastly, to ensure that the advanced IRCA measurement is supervised, IRCA ratings are monitored, with reports submitted on a quarterly basis to the Bank's Sustainability Committee.

3. Decarbonisation pathways: in line with the commitments established by the NZBA, the Institution has set decarbonisation targets for 2030 for the most GHG emissions-intensive sectors, acting at the stage of the production chain where a reduction is most likely to reduce the overall volume of emissions. These sectors include electricity, oil and gas, cement, coal, iron and steel, automotive, aviation, retail mortgages, commercial real estate, aluminium, and shipping. For borrowers operating in sectors affected by the decarbonisation pathways defined by the Group, there is a defined workflow to identify, evaluate and monitor the suitability of any significant transactions to which pathways are applied, at origination and thereafter. In addition, since the first quarter of 2023, the evolution of decarbonisation pathways has been monitored on a quarterly basis and reported to the Sustainability Committee and the Technical Risk Committee. This monitoring makes it possible to track the transition of the portfolio towards a low-emissions economy and to mitigate environmental risks by supporting customers in their transition process.

To ensure effective application of the ESG credit risk management guidelines, the Bank has a central pool of analysts specialised in ESG, who are responsible for conducting the advanced IRCA evaluation of borrowers and for determining their level of compliance with the ESG credit risk guidelines. This way, the complete ESG analyses include an advanced IRCA evaluation, an assessment of compliance with the Environmental and Social Risk Framework, as well as a specific analysis of decarbonisation pathways in the case of transactions subject to sectoral pathways.

This framework limits the authorisation of any type of finance for counterparties that (i) do not comply with the Environmental and Social Risk Framework, (ii) have been scored with an advanced IRCA and engage in a GHG emissions-intensive activity, but especially, have poor performance and/or a poor attitude to the transition, and (iii) do not fulfil decarbonisation pathways (where applicable). This way, the Bank seeks to maintain and support emissions-intensive companies, provided they have made sufficient progress in their ESG management and performance and have a positive attitude in this respect, demonstrating their commitment.

ESG annex in executive summary of the risk management record

On a supplementary basis and in order to add to the assessment of counterparties' ESG disputes, for the operations of Corporate Banking Spain and EMEA foreign branches with minimal decision-making powers in the Group's Risk Operations Committee (ROC) which do not have an up-to-date, or have an expired, advanced IRCA assessment as at the date of the risk assessment, since the end of 2024, an ESG annex has been included within the risk management record, which assesses the existence of any relevant disputes involving the counterparty, linked to climate-related or environmental aspects and to social and/or governance aspects.

Climate-related and environmental performance of the loan book

The Bank evaluates the impact of its loan book with two different assessments. The first consists of measuring the loan book's climate-related and environmental risk, while the second focuses on measuring the portfolio's carbon footprint.

Measuring the climate-related and environmental risk of the loan book

The first type of assessment focuses on measuring the climate-related and environmental risk of the borrowers receiving finance. There are two approaches to this measurement:

- a. Bottom-up approach: the climate-related and environmental risk of large corporates in the loan book is measured following a bottom-up approach using the advanced IRCA (included in the ESG credit risk management guidelines). All transactions, companies and corporate groups submitted to or reviewed by the Delegated Credit Committee have an advanced ESG analysis. This analysis, as explained in the section "Management of risks related to climate change", is based

on an integrated and modular evaluation that considers transition risks, physical risks and environmental degradation risks, as well as the existence of any controversies or disputes involving the counterparties. Thus, although the risks inherent in the activity of each borrower are considered, these are adjusted according to the maturity of their ESG management arrangements. To that end, various factors are analysed, such as the decarbonisation strategy, the trend of emissions, the management of ESG risks, and the commitments to reduce emissions.

- b. Top-down approach: the second approach, which applies to smaller businesses, retail customers, or companies that despite being large corporates fall outside of the scope of the advanced IRCA as their associated exposures do not meet the parameters requiring its application, is based on batch measurements carried out by the Bank using the climate risk and environmental degradation risk models with a top-down approach. In addition, to ascertain the impact of the portfolio under stress in different scenarios, various stress tests are conducted.

In 2024, the Institution developed a new simplified model to measure and score the environmental performance of companies that are not required to publish non-financial reports or that lack an advanced IRCA analysis, called the automated IRCA. Based on the data available in the Institution's systems, such as the location and economic activity of the counterparties, the automated IRCA keeps consistency with the modular and conceptual structure of the advanced IRCA, offering an initial estimate of the climate-related and environmental risks of the entire business portfolio, without requiring any direct input from the analysts. Since its implementation, this tool has been used for the climate risk assessment of portfolios not subject to the advanced IRCA or without a specific score, and reports are sent to the Sustainability Committee on a quarterly basis.

Calculating the financed emissions of the loan book

The second type of assessment carried out by the Bank consists of measuring the emissions of the financed credit portfolio. This measurement is vital when it comes to managing ESG risk, as it is a quantitative metric for which a standardised methodology exists, enabling comparability. Furthermore, this measurement is carried out for the entire loan book, in other words, not only for loans granted to companies, but instead also measuring emissions of other portfolios such as that of mortgages, sovereign bonds, auto loans and project finance.

For more details, see the passage on Emissions of the financed portfolio in section [2.1.3 Energy consumption and carbon footprint](#) of this document.

Rating adjustments for climate risks and collateral valuations

In relation to the inclusion of environmental risks in the calculation of the expected loss, through the PD, the Institution adjusts the ratings of large corporates when the IRCA score is high or when the counterparty is involved in significant unmitigated disputes. It is thus included directly, as the rating is an input of the expected loss parameters (specifically, the PD).

Furthermore, in order to reflect the impact of these risks in the collateral valuations of the loan book, the Institution applies adjustments to lower the appraisal value. In the case of physical risk, this adjustment reflects, for each collateral item, the extent of the deterioration in the

event of flood, fire or water stress, as well as the probability of occurrence of those events.

In the case of transition risk, the appraisal value is lowered for collateral with an energy rating below D. The methodology used for the aforementioned collateral adjustments coincides with that applied in the top-down approach described above, i.e. based on an internal methodology for the quantitative assessment of climate-related physical risk where a distinction is made between acute and chronic events in line with the three scenarios of the Network for Greening the Financial System (NGFS), namely Orderly Transition, Disorderly Transition and Hot House World, adapted to a 30-year time horizon. This makes it possible to assess physical risk drivers that could have a more significant impact on the portfolio, based on the location and activities of customers.

Initiatives to improve the quality of environmental information

Given the limited level of ESG reporting and disclosures by companies, as well as the lack of historical data and the absence of standardisation between the reported information and the monitoring metrics for these risks, it is crucial to have access to the best possible ESG data in order to identify, manage, classify and monitor risks associated with climate change.

For this reason, Banco Sabadell Group has been taking various actions to increase the quantity and quality of ESG data about customers. There are two particular areas that are worth mentioning:

- Real estate collateral: with the support of a third-party supplier, batch uploads of the energy ratings of residential real estate and Commercial Real Estate (CRE) of the portfolio are carried out, where this information is not available. For newly granted loans, the Group obtains this information upon originating the mortgages.
- Business risk: in this segment, various different initiatives have been launched over time:
 - In 2021, a task force was put together to gather environmental data from customers, as the first pilot project focusing on the CO₂ emissions-intensive portfolio. This exercise included, among other things, the compilation of actual emissions (scopes 1, 2 and 3), as well as additional data, such as energy consumption, percentage of renewables consumption, emissions prevented (where applicable), external ESG ratings, environmental targets, and KRIs regarding the emissions intensity of each sector.
 - To calculate the carbon footprint of the financed business portfolio, it was necessary to gather actual data on borrowers' emissions, as well as the information needed to calculate the attribution factor.
 - In addition, using the IRCA evaluation conducted by ESG analysts, customers' ESG data is collected. To expedite this process in its initial phase, a third-party supplier was hired to conduct a batch upload of the ESG data pertaining to the main borrowers.
 - Similarly, in line with the Bank's decarbonisation strategy, data was captured regarding the emissions, production and transition plans of the main borrowers affected by the decarbonisation pathways. This information was obtained, in the first place, from public sources and, where necessary, by contacting the customers directly.
 - Since 2023, the Bank has been taking part in a sectoral project between AEB (Spanish Banking Association), CECA (Spanish Confederation of Savings Banks) and UNACC (Spanish National

Union of Credit Cooperatives) to collect information related to the taxonomy from borrowers. Working together with an external consultant, the eligibility and alignment indicators of borrowers that have this information publicly available were obtained. Furthermore, a methodology was defined on a sector-wide basis to process that data in order to ensure uniform reporting.

- In addition, due to the climate stress test conducted in 2024, data was gathered in relation to the emissions (scope 1, 2 and 3) and decarbonisation targets of the Group's priority emissions-intensive customers.

Complementary to this work to gather external information from customers, the Bank works internally to centralise ESG information through a thematic sustainability datamart in order to provide a single point of access to all those who require it. To ensure the internal control of the information managed, during the process a person is assigned to be directly responsible for the information, and data users are also defined. Based on the assigned responsibilities, a series of tasks are established to ensure the quality and uniformity of the information.



2.1.3 Energy consumption and carbon footprint

Energy consumption and mix

Fossil fuels consumption

The consumption of natural gas in Spain is limited to three of the corporate buildings. It is used to reinforce the HVAC system, both to provide heat and for dehumidification purposes. Continuous efforts are made to ensure systems are correctly maintained to deliver optimal consumption efficiency. In the United Kingdom, natural gas is mainly used in winter throughout the entire branch network and also in corporate buildings. No natural gas is consumed in Mexico or the USA, as their HVAC systems run entirely on electricity.

In terms of the consumption of diesel, as a result of the blackout that occurred in Spain in April, which required electric generators to be used in our main corporate buildings, diesel consumption recorded an increase of 77% compared to 2024 and of 81% compared to 2023.

Renewable energy consumption

In all of the geographies in which Banco Sabadell Group carries out its activity, practically 100% of the electricity acquired for use in its facilities has a renewable origin certification.

The following table shows the energy consumption in 2024 and 2025 for Banco Sabadell Group, as well as the proportion of fossil fuels and renewable sources:

Energy consumption and mix, Banco Sabadell Group ³⁹	2024 ⁴⁰	2025
Total fossil fuels consumption (MWh)	8,532	7,521
Share of fossil sources in total energy consumption (%)	13.1%	12.8%
Consumption from nuclear sources (MWh)	0	0
Share of consumption from nuclear sources in total energy consumption (%)	0%	0%
Consumption from renewable sources (MWh)	0	0
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	55,972	50,138
Consumption of self-generated non-fuel renewable energy (MWh)	638	1,339
Total renewable energy consumption (MWh)	56,610	51,477
Share of renewable sources in total energy consumption (%)	86.9%	87.3%
Total energy consumption (MWh)	65,141	58,998

³⁹ Includes consumption data for the two corporate buildings in Miami (Miami Lakes Operating Center and Sabadell Financial Center).

⁴⁰ See footnote number 31.

Spain

In Spain, the Institution has solar panels that generate 3.4% of the electricity used in this geography, allowing the Bank to reduce the electric power that it acquires from its usual reseller to 96.6%.

Energy consumption and mix - Banco Sabadell (Spain)	2024	2025 ⁴¹
Total fossil fuels consumption (MWh)	2,933	3,196
Share of fossil sources in total energy consumption (%)	6.3%	7.5%
Consumption from nuclear sources (MWh)	0	0
Share of consumption from nuclear sources in total energy consumption (%)	0%	0%
Consumption from renewable sources (MWh)	0	0
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	43,323	38,252
Consumption of self-generated non-fuel renewable energy (MWh)	638	1,339
Total renewable energy consumption (MWh)	43,961	39,591
Share of renewable sources in total energy consumption (%)	93.7%	92.5%
Total energy consumption (MWh)	46,895	42,787

TSB (United Kingdom)

TSB completed the third phase of its Energy Optimisation Programme, which helped to reduce the location-based energy consumption of natural gas, diesel and electricity by -2,084 MWh compared to 2024.

Energy consumption and mix - TSB (UK)	2024	2025
Total fossil fuels consumption (MWh)	5,598	4,325
Share of fossil sources in total energy consumption (%)	32.7%	28.7%
Consumption from nuclear sources (MWh)	0	0
Share of consumption from nuclear sources in total energy consumption (%)	0%	0%
Consumption from renewable sources (MWh)	0	0
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	11,550	10,740
Consumption of self-generated non-fuel renewable energy (MWh)	0	0
Total renewable energy consumption (MWh)	11,550	10,740
Share of renewable sources in total energy consumption (%)	67.4%	71.3%
Total energy consumption (MWh)	17,149	15,065

⁴¹ In 2025, the estimated consumption of Automated Teller Machines (ATMs) whose electric supply is arranged by the property owner and not by the Bank has been included. If this estimate were included for 2024, total energy consumption in Spain would be 47,255 MWh (44,214 MWh with renewable origin, or 93.6%). At the Group level, total energy consumption would be 65,501 MWh (56,863 MWh with renewable origin, or 86.8%).

Mexico

The Institution's facilities in Mexico only use electric power, which has a Renewable Energy Guarantee of Origin (REGO), with no need to consume any energy created from fossil fuels.

Energy consumption and mix - Banco Sabadell (Mexico)	2024	2025
Total fossil fuels consumption (MWh)	0	0
Share of fossil sources in total energy consumption (%)	0%	0%
Consumption from nuclear sources (MWh)	0	0
Share of consumption from nuclear sources in total energy consumption (%)	0%	0%
Consumption from renewable sources (MWh)	0	0
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	368	452
Consumption of self-generated non-fuel renewable energy (MWh)	0	0
Total renewable energy consumption (MWh)	368	452
Share of renewable sources in total energy consumption (%)	100%	100%
Total energy consumption (MWh)	368	452

Gross Scopes 1, 2, 3 and Total GHG emissions

The CO₂ emissions released by the Group in the geographies in which it is present (Spain, United Kingdom, Mexico and United States) amounted to 12,502 tonnes⁴², according to marked-based data, recording a change of -4.4% compared to 2024.

By virtue of Royal Decree 214/2025 of 18 March, which created the carbon footprint, offsetting and carbon dioxide absorption projects register and imposed the obligation to calculate the carbon footprint and draw up and publish plans for the reduction of greenhouse gas emissions, which was published in the Official State Gazette (BOE) on 12 April 2025, certain parameters need to be considered to calculate the carbon footprint in Spain, including the obligation to use the emission factors published by the Spanish Ministry for the Green Transition and the Demographic Challenge (Ministerio para la Transición Ecológica y el Reto Demográfico, or MITECO).

Consequently, in fulfilment of the new rules on calculating the scope 1 and 2 carbon footprint in Spain, to calculate its operational CO₂e carbon footprint in 2025, the Bank has used the information available at the time of writing and publishing this 2025 Sustainability Report, as indicated below:

- the emission factors published by MITECO correspond to the year 2024;
- to calculate gross location-based scope 2 emissions, the demand and generation mix for the Iberian Peninsula in 2024 published by Spain's national grid, Red Eléctrica Española⁴³, has been used;
- some energy consumption data has been estimated, as the corresponding invoices for the supplies have not yet been received.

⁴² Does not include the footprint generated by real estate assets that have been leased out, estimated at 384 tonnes of CO₂e, which would correspond to 3% of the Group's total carbon footprint.

⁴³ https://www.ree.es/en/datos/generation/non-renewable-detail-CO2-emissions?end_date=2024-12-31T23:59&start_date=2024-01-01T00:00&systemElectric=peninsular&time_trunc=year.

Banco Sabadell Group (all geographies)	Base year ⁴⁴	2024	2025	% variation	Target year ⁴⁵	Annual % target / Base year ⁴⁶
Scope 1 GHG emissions						
Gross Scope 1 GHG emissions (tCO ₂ e)	n.a.	2,460	3,029	23.1%	n.a.	n.a.
% of Scope 1 GHG emissions from regulated emission trading schemes	n.a.	0	0	0	n.a.	n.a.
Scope 2 GHG emissions						
Gross location-based Scope 2 GHG emissions (tCO ₂ e)	n.a.	14,112	5,447	-61.4%	n.a.	n.a.
Gross market-based Scope 2 GHG emissions (tCO ₂ e)	n.a.	25	18	-0.268	n.a.	n.a.
Significant Scope 3 GHG emissions						
Total gross indirect (Scope 3) GHG emissions (tCO ₂ e)	n.a.	10,597	9,455	-10.8%	n.a.	n.a.
Purchased goods and services						
Water	n.a.	101	104	3.4%	n.a.	n.a.
Paper	n.a.	1,242	1,016	-18.2%	n.a.	n.a.
Plastic	n.a.	9	8	-11.1%	n.a.	n.a.
Waste generated in operations	n.a.	120	133	10.7%	n.a.	n.a.
Business travelling	n.a.	4,058	3,475	-14.4%	n.a.	n.a.
Employee commuting	n.a.	5,067	4,720	-6.8%	n.a.	n.a.
Total GHG emissions						
Total GHG emissions (location-based) (tCO ₂ e)	n.a.	27,169	17,931	-34%	n.a.	n.a.
Total GHG emissions (market-based) (tCO ₂ e)	n.a.	13,082	12,502	-4.4%	n.a.	n.a.

For goods purchased and waste generated at the Group level, included in the table above, consumption in 2025 compared to the previous year is as follows:

	Consumption		
	2024	2025	Change
Water	267.952 m3	271.812 m3	1%
Paper	1.054 t	874 t	-17%
Plastic	3 t	3 t	0%
Non-hazardous waste	1.427 t	1.470 t	3%
Hazardous waste	5 t	12 t	140%

⁴⁴ The base year for the geographies with established targets (Spain and United Kingdom) is not the same, so the details, along with the targets, are available in the individual tables provided in the section entitled "Carbon footprint, by geography".

⁴⁵ See Note 42 of the same table.

⁴⁶ See Note 42 of the same table.

Carbon footprint, by geography⁴⁷:

Spain	Base year (2024)	2024 ⁴⁸	2025	% variation	2030	Annual target %
Scope 1 GHG emissions						
Gross Scope 1 GHG emissions (tCO ₂ e)	1,331	1,331	2,039	53.0%	1,511	-1.5% ⁴⁹
% of Scope 1 GHG emissions from regulated emission trading schemes	0	0	0	0		
Scope 2 GHG emissions						
Gross location-based Scope 2 GHG emissions (tCO ₂ e)	11,264	11,264	3,075 ⁵⁰	-73.0%	3,555	
Gross market-based Scope 2 GHG emissions (tCO ₂ e)	0	0	0	0	0	-100%
Significant Scope 3 GHG emissions						
Total gross indirect (Scope 3) GHG emissions (tCO ₂ e)	5,150	5,150	5,216	1.0%	n.a.	n.a.
Purchased goods and services						
Water	84	84	91	8.0%	n.a.	n.a.
Paper	595	595	549	-8.0%	n.a.	n.a.
Plastic	9	9	8	-11.0%	n.a.	n.a.
Waste generated in operations	116	116	129	11.0%	n.a.	n.a.
Business travelling	2,476	2,476	2,430	-2.0%	n.a.	n.a.
Employee commuting ⁵¹	1,869	1,869	2,009	7.0%	n.a.	n.a.
Total GHG emissions						
Total GHG emissions (location-based) (tCO ₂ e)	17,745	17,745	10,330	-42.0%	n.a.	n.a.
Total GHG emissions (market-based) (tCO ₂ e)	6,481	6,481	7,255	12.0%	n.a.	n.a.

⁴⁷ The emission factors applied were updated during 2025 by various official institutions and/or internationally recognised organisations. In the case of Spain, the emission factors are those published by the Spanish Ministry for the Green Transition and the Demographic Challenge (MITECO) in 2025, which corresponded to 2024 (with the exception of business travelling and employee commuting, for which data published by DEFRA 2025 and by the Catalan Office for Climate Change (Oficina Catalana del Canvi Climàtic) have been used). In the case of the United Kingdom and Mexico, emission factors correspond to DEFRA 2025. In the case of the USA, emission factors correspond to those published by the US Environmental Protection Agency and by DEFRA 2025.

⁴⁸ This report contains the emissions figure corresponding to 2024 for Spain, as provided in the 2024 Sustainability Report, which was verified together with the rest of its content by the statutory auditor. If one were to consider that provided in Royal Decree 214/2025 of 18 March, which created the carbon footprint, offsetting and carbon dioxide absorption projects register and imposed the obligation to calculate the carbon footprint and draw up and publish plans for the reduction of greenhouse gas emissions, the carbon footprint calculation for 2024 would come to a total of 6,810 tCO₂e market-based (10,364 tCO₂e location-based). Scope 1: 1,660 tCO₂e; Scope 2: 0 tCO₂e market-based and 3,554 tCO₂e location-based; Scope 3: 5,150 tCO₂e.

⁴⁹ The footprint reduction commitment is based on the recalculation described in note 45 above (Scope 1: 1,660 tCO₂e).

⁵⁰ The emission factor used corresponds to the final generation mix for the Iberian peninsula in 2024 published by Spain's national grid, Red Eléctrica Española (www.ree.es). The emission factor used in previous years is the electricity label published by the CNMC (Spanish National Commission on Markets and Competition). Were the peninsular generation mix emission factor to be applied to the previous year's electricity consumption, location-based emissions in 2024 would come to 3,466 tCO₂e. In this case, the percentage reduction of emissions in 2025 would be 11.3%.

⁵¹ In Spain, the carbon footprint generated during commutes is calculated for the corporate buildings with the largest number of employees. Total emissions calculated in this category for Spain, corresponding to 2025, came to 2,009.06 tonnes of CO₂e.

United Kingdom	Base year (2023)	2024	2025	% variation	2030	Annual target %
Scope 1 GHG emissions						
Gross Scope 1 GHG emissions (tCO ₂ e)	1,410	1,100	880	-20.0 %	493	-9.3%
% of Scope 1 GHG emissions from regulated emission trading schemes	0	0	0	— %		
Scope 2 GHG emissions						
Gross location-based Scope 2 GHG emissions (tCO ₂ e)	2,728	2,417	1,919	-21.0 %	0	
Gross market-based Scope 2 GHG emissions (tCO ₂ e)	0	25	18	— %	0	-100% renewable origin
Significant Scope 3 GHG emissions						
Total gross indirect (Scope 3) GHG emissions (tCO ₂ e)	5,700	4,880	3,915	-20.0 %	3290 ⁵²	-4.6%
Purchased goods and services						
Water	14	11	9	-15.0 %		
Paper	657	647	466	-28.0 %	381	-6.0%
Plastic	0	0	0			
Waste generated in operations	13	4	4	-3.0 %		
Business travelling	855	1,020	724	-29.0 %	2,909	-6.0%
Employee commuting	4,161	3,197	2,711	-15.0 %		
Total GHG emissions						
Total GHG emissions (location-based) (tCO ₂ e)	9,838	8,396	6,714	-20.0 %		
Total GHG emissions (market-based) (tCO ₂ e)	7,110	6,004	4,813	-20.0 %		

Mexico ⁵³	Base year	2024	2025	% variation	2025	Annual target %
Scope 1 GHG emissions						
Gross Scope 1 GHG emissions (tCO ₂ e)		29	73	152.0% ⁵⁴		
% of Scope 1 GHG emissions from regulated emission trading schemes		0	0	0		
Scope 2 GHG emissions						
Gross location-based Scope 2 GHG emissions (tCO ₂ e)		161	201	25.0%		
Gross market-based Scope 2 GHG emissions (tCO ₂ e)		0	0	0		
Significant Scope 3 GHG emissions						
Total gross indirect (Scope 3) GHG emissions (tCO ₂ e)		270	172	-36.0%		
Purchased goods and services						
Water		4	2	-57.0%		
Paper		0	1	—%		
Plastic		0	0	—%		
Waste generated in operations		0	0	—%		
Business travelling		265	169	-36.0% ⁵⁵		
Total GHG emissions						
Total GHG emissions (location-based) (tCO ₂ e)		460	446	-3.0%		
Total GHG emissions (market-based) (tCO ₂ e)		299	245	-18.0%		

⁵² Target relates only to business travelling and employee commuting.

⁵³ Mexico has not set any carbon footprint reduction targets, so no data is included in relation to the base year, target year or annualised % of target.

⁵⁴ The increase compared to 2024 is due to the correction of mismatches in the recorded figures for fuel consumption by the fleet of vehicles controlled by the Institution. If the adjustments made in 2025 were applied to the recorded figures of the previous year, the recalculated footprint for gross scope 1 emissions in 2024 would be 57 tCO₂e.

⁵⁵ The reduction in the footprint associated with business travelling is due to the Institution's annual efforts to optimise travel arrangements.

Emissions of the financed portfolio

Since 2021, Banco Sabadell Group has calculated the carbon footprint of its financed portfolio using the Partnership for Carbon Accounting Financials (PCAF) methodology.

Emissions of the financed portfolio account for the largest share of the Group's emissions. Therefore, since 2021, Banco Sabadell Group has calculated the carbon footprint of its financed portfolio using the Partnership for Carbon Accounting Financials (PCAF) methodology. PCAF is a global partnership of financial institutions that work together to develop and implement a global harmonised approach to measure and disclose the emissions associated with their loans and investments.

As part of this partnership, 16 institutions established the design of the Global GHG Accounting and Reporting Standard for the Financial Industry, which aims to harmonise greenhouse gas emissions accounting. Banco Sabadell became a member of the PCAF in June 2022. The measurement of the financed portfolio's emissions using this Standard is a key step for financial institutions to assess the transition risks associated with climate change, set targets aligned with the Paris Agreement and develop effective strategies to decarbonise the economy.

As regards the PCAF methodology, Banco Sabadell Group has applied the methodology envisaged in the Standard mentioned above, which has been devised mainly for financial institutions wishing to measure and share their GHG emissions financed through their loans and investments, and which allows the following asset classes to be measured:

- Business loans and unlisted equity.
- Project finance.
- Commercial Real Estate (CRE) mortgages.
- Residential mortgages.
- Motor vehicle loans.
- Sovereign bonds (new category in 2023).

It is worth mentioning that the PCAF has two methodological approaches for listed equity and corporate bonds. In this case, the Bank uses the same methodology that it does for business loans and unlisted equity, in which the attribution considers counterparties' balance sheet data. The other approach, based on companies' stock market valuations, is not applied in this case given the volatility that it generates for the attribution factor.

The Group has calculated its carbon footprint (scope 1 and 2) as at 2025 year-end for approximately 97% of its financed portfolio.

Based on this methodology, the Group has calculated its carbon footprint (scope 1 and 2) as at 2025 year-end for approximately 97% of its financed portfolio. The portfolios not calculated are those for which no calculation or estimation standards or methodologies exist as yet, such as the financing of consumer loan portfolios for purposes other than vehicle purchase or private banking, among others.

It is worth noting that the Group has continued to upgrade its calculation model through a process of ongoing improvement, to obtain

more reliable and complete results. The following improvements are particularly worth mentioning:

- I) Calculation of the new Sovereign Bonds segment of the portfolio within the model used to calculate the carbon footprint, following the new methodology published by the PCAF.
- II) Inclusion of fixed-income contracts for corporate bonds in the business segment.
- III) Inclusion of new PCAF emission factors in the calculation of emissions stemming from the financed business portfolio.
- IV) Improved Data Quality (DQ), with actual emissions, surface areas and energy performance certificates, both actual and estimated by appraisal firms, as well as the value and type of vehicle.
- V) Updated emission factors for projects involving the generation of non-renewable energy in each geography based on official sources and updated PCAF factors.

To ensure that the carbon footprint of the financed portfolio is monitored and supervised, since September 2022 the emissions stemming from the loan portfolio have been monitored on a quarterly basis and reported to the Sustainability Committee and to the Technical Risk Committee⁵⁶.

The absolute emissions of the Group's financed portfolio in terms of scope 1 and 2 as at the end of 2025 came to 15.225⁵⁷ million tCO₂eq, which, considering the emission intensity value calculated using the standard measurement in the sector, which is per million euros financed, represents an emission intensity of 74.8 tCO₂eq/€m with an average DQ of 3.13. To complement this, if one were to calculate the intensity of financed emissions based on net revenue⁵⁸, this would be 3,110 tCO₂eq/€m.

The segment that contributes the most to the footprint is the business portfolio (approximately 56%), which represents 36% of the credit exposure in the portfolio. Compared to the end of 2024, emissions have fallen slightly, which coupled with the increase in investment over that same period has led to a significant decrease in the emission intensity per euro financed of -3.8% in 2025. In addition, the average DQ has improved, reflecting the efforts made to incorporate counterparties' actual emissions data, where they calculate and publish such information. This improvement has been possible thanks to the regular exercises carried out to obtain actual data for the various segments.

The sectors that contribute the most to the financed portfolio's footprint are Agriculture, forestry and fishing, Steel, Construction materials, and Industrial chemical production.

It is worth noting that the segment that remains the second-biggest contributor in 2025 is the segment corresponding to the issuance of sovereign bonds, which includes the LULUCF⁵⁹ factor. Details of the emissions of each PCAF segment are provided below:

15.225^M

**Absolute emissions of
the Group's financed portfolio
in terms of Scope 1 and 2. In millions
tCO₂eq**

⁵⁶ Details of the attributions of management bodies in relation to climate-related matters are provided in chapter 1.3 "Governance".

⁵⁷ The previously reported data includes financed emissions and the emission intensity per million euros financed, as that is where the most significant emissions are found.

⁵⁸ Estimates relate to the financed portfolio, as that is where the majority of a financial institution's emissions are concentrated. As an indicator of net revenue, the main metric of a financial institution's revenue, Gross Income, has been selected. That indicator includes the following items: net interest income, fee and commission income, profit or loss on financial operations, other operating income and expenses, and income and expenses on assets and liabilities under insurance contracts.

⁵⁹ Land Use, Land-Use Change and Forestry.

SEGMENT	INTENSITY (tCO ₂ /€m)	DQ
Business loans and unlisted equity	118	3.50
Project finance	64	3.55
Commercial Real Estate (CRE) mortgages	42	4.08
Residential mortgages (includes TSB) ⁶⁰	16	3.34
Motor vehicle loans	199	3.60
Sovereign bonds (new category in 2023)	140	1.02

The Bank is focusing its efforts on setting decarbonisation targets for the most emissions-intensive sectors of its business portfolio (see section [2.1.1 Transition plan for climate change mitigation](#)). Each sector's emissions for 2024 can be found in the Bank's latest Pillar 3 Disclosures report⁶¹.

On the other hand, the Bank is focusing its efforts on project finance for renewable energies, in order to promote the transition to a sustainable economy. These efforts are also reflected in the 1.93 million tCO₂eq of emissions prevented as a result of financing these types of projects.

To ensure that measurements of the financed portfolio's carbon footprint are supervised, they are monitored on a quarterly basis and reported to the Bank's Sustainability Committee and to the Technical Risk Committee⁶². In addition, the calculation of the financed portfolio's carbon footprint is audited every year, with the participation of an independent third party, obtaining favourable results in the most recent audit.

⁶⁰ The data for coverage of emissions in TSB corresponds to 2023 year-end.

⁶¹ For more details about the emissions of the financed business portfolio, refer to the latest Pillar 3 Disclosures report, which contains the emissions breakdown of each carbon-intensive sector and is publicly available on Banco Sabadell's corporate website.

⁶² Details of the attributions of management bodies in relation to climate-related matters are provided in chapter [1.3.1 Sustainability governance](#).



3. Social information

3.1 Own workforce

Banco Sabadell has a committed and professional workforce that is dedicated to helping people and companies make the best financial decisions, creating long-term value for our shareholders, employees and society.

We do this through responsible management and an unwavering commitment to the environment. The Bank has policies and procedures in place aimed at attracting and developing talent, promoting the commitment of its workforce, and fostering diversity and inclusion.

Banco Sabadell's culture hinges on "Being Sabadell", a concept that is in the DNA of our Institution's corporate culture and which reflects a way of doing things and of being that is unique to the Bank, in addition to being the basis for the Talent Management Model. It can be summed up in three pillars: mindset, acting with the customer and the Bank in mind; delivery, working with dedication and efficiency; and engagement, adopting a positive and collaborative attitude. "Being Sabadell" is the formula used by the Bank's best professionals and it is what sets us apart from other banks.

Banco Sabadell uses its internal policies and procedures to promote actions that allow the entire workforce to work in an environment in which fairness and equality are the strategic elements of the corporate culture.

The Institution's remuneration policies establish, as a core principle, the need to ensure a competitive and fair remuneration system (external competitiveness and internal fairness), which among other things involves aligning with market standards and being flexible in order to adapt to the needs and requirements of the environment and the sector.

The gender pay gap is a priority focus area for Banco Sabadell's workforce management. Its policies and procedures lay down mechanisms to prevent and mitigate unequal pay between men and women, along with the commitment to gradually reduce that gap and move ahead with the goal of supporting the economic and social transformation of the environment. In terms of equal pay, Banco Sabadell ensures that, for the same role with the same responsibility, there is no wage discrimination between genders, neither when recruiting staff nor during employees' salary reviews, monitoring the impact of any salary-related actions.

The identified gender pay gap is framed within cross-cutting structural factors. These factors relate to the uneven representation of women and men in certain positions, in a context influenced by historical patterns and the characteristics of the labour markets; it does not stem from circumstances of specific groups that require any additional measures.

The People & Sustainability division remains firm in its commitment to ensure that Banco Sabadell has the necessary people at all times: people who are committed, motivated and work efficiently. This strategic priority is the driver of the Talent Management Model, which aims to provide those working at the Institution with the best place in which to develop their professional careers.

The training proposal, always aligned with the needs of the business and with the regulatory framework, seeks to foster people's professional development so that they can become the drivers of change, leading the transformation and innovation of the sector.

In addition, the Group, aware that good working conditions are important for the health and safety of its people, follows a policy of prevention and continuous improvement of the working conditions and health of its teams. The Equality Plan, signed in February 2022 with workers' legal representatives, aims to ensure that the workforce has a good work-life balance, and sets out work-life balance measures available to the entire workforce, in addition to establishing a framework for flexible working hours that can be used to improve the balance between personal and professional interests under equal terms for both men and women.

The team of professionals at Banco Sabadell is capable of transforming itself and facing up to major challenges, as they bring their best selves to work, with the firm commitment of driving forward the economic and social transformation of the environment.

Banco Sabadell Group showed its gratitude for the joint effort and devotion demonstrated during 2025, by recognising the entire workforce, in order to further strengthen their engagement with the organisation.

Lastly, for all of the initiatives and measures mentioned later on, the Group has allocated the necessary resources (personal and economic) to ensure that material impacts are managed. All of these initiatives and measures are linked to material impacts, as no material risks or opportunities have been identified in connection with its own workforce.

In conclusion, the practices of the Bank do not generate any material negative impacts on its own workforce.

3.1.1 Characteristics of the undertaking's employees

As at 31 December 2025, Banco Sabadell Group has a workforce with 18,736 people, distributed across the various geographies in which it operates. 99% of the workforce have a permanent contract, reflecting the Group's commitment to job stability. The average age is 46 years and the average length of service in the organisation is 17 years, which is evidence of solid talent retention.

Diversity is a key value in Banco Sabadell: in terms of its geographical distribution, 29% of the workforce operates outside of Spain and, in terms of gender, 54.7% are women, which contributes to the plurality and balance of the organisation. Over the past year, the Group's workforce has remained broadly stable, with a drop of 0.2%, going from 18,769 to 18,736 staff. The sector and the Institution continue to outdo themselves, in a context of continuous transformation driven by digitalisation, the evolution of working models, and technological challenges, with the goal of anticipating and meeting the needs of the workforce, customers, and all stakeholders.

In addition, as at December 2025, Banco Sabadell has 233 people who are not employees working on temporary contracts in Spain, hired through temporary employment agencies. These people have been hired in order to provide cover for short-term absences (of up to 90 days) and planned annual leave, always provided the service needs cannot be met through other means. 100% of these temporary staff members are located in the branch network.

18,736

Employees

54.7%

Women

Banco Sabadell Group employees: Breakdown by gender, professional category, country and nationality⁶³

Gender	2025	2024
Male	8,487	8,512
Female	10,249	10,257
Other	Not applicable	Not applicable
Not reported	Not applicable	Not applicable
Total	18,736	18,769

Group data as at 31/12/2025.

	2025			2024		
Professional category	Men	Women	Total	Men	Women	Total
Senior management	589	324	913	569	297	866
Middle management	1,934	1,456	3,390	1,921	1,407	3,328
Specialist staff	5,424	7,183	12,607	5,467	7,215	12,682
Administrative staff	540	1,286	1,826	555	1,338	1,893
Total	8,487	10,249	18,736	8,512	10,257	18,769

Group data as at 31/12/2025.

Country	2025	2024
Spain	13,252	13,156
United Kingdom	4,650	4,761
Mexico	509	526
Other geographies	325	326
Total	18,736	18,769

Group data as at 31/12/2025. Workforce in the United Kingdom includes employees at TSB and at Banco Sabadell's London branch.

Nationality	2025	2024
Spanish	69.5%	69.0%
British	22.2%	23.0%
Mexican	2.7%	2.7%
United States	1.2%	1.2%
Other nationalities	4.4%	4.1%
Total	100%	100%

Group data as at 31/12/2025.

⁶³ This information can also be found in "Note 33 – Administrative expenses" to the 2025 consolidated annual financial statements. In addition, the reported figures include the 11 workers from the Banco Sabadell Foundation.

Breakdown of staff departures from the Group due to dismissal

As at December 2025, a total of 157 staff departures had taken place, fewer than in 2024. This reduction is mainly due to a cost management programme that was implemented at TSB in 2024, which produced a significant reduction in the workforce.

Professional category	2025			2024		
	Men	Women	Total	Men	Women	Total
Senior management	10	3	13	8	6	14
Middle management	16	10	26	39	26	65
Specialist staff	48	42	90	156	131	287
Administrative staff	11	17	28	54	180	234
Total	85	72	157	257	343	600

Group data as at 31/12/2025.

Age range	2025			2024		
	Men	Women	Total	Men	Women	Total
Under 30	16	10	26	26	41	67
Between 30 and 50	51	40	91	144	173	317
Over 50	18	22	40	87	129	216
Total	85	72	157	257	343	600

Group data as at 31/12/2025.

Voluntary turnover

The Voluntary Turnover Rate (VTR⁶⁴) of the Group (ex-TSB) in 2025 was 1.9%. In Spain, the voluntary turnover rate was 1.5%, remaining broadly stable compared to 2024. Among those below the age of 30, the rate dropped by 1.6 percentage points. Talent management has made it possible to maintain a loyal and devoted workforce. The turnover rate fell by 1.3 percentage points in the international perimeter, due to fewer voluntary departures taking place in Mexico.

Age range	2025		2024	
	National	International	National	International
Under 30	8.9%	20.9%	10.5%	20.7%
Between 30 and 50	1.5%	6.8%	1.2%	8.5%
Over 50	0.1%	4.3%	0.2%	5.1%
Total	1.5%	7.6%	1.5%	8.9%

Voluntary turnover rate = ((annual voluntary leavers) / (average workforce)) * 100. Group (ex-TSB) data as at 31/12/2025. 'International' includes Mexico, foreign branches and representative offices.

Gender	2025		2024	
	National	International	National	International
Men	2.2%	7.3%	2.0%	8.5%
Women	0.9%	7.9%	1.0%	9.5%
Total	1.5%	7.6%	1.5%	8.9%

Voluntary turnover rate = ((annual voluntary leavers) / (average workforce)) * 100.

⁶⁴ Rate that measures those leaving the Group (ex-TSB) on a voluntary basis.

Involuntary turnover

The Involuntary Turnover Rate (ITR⁶⁵) of the Group (ex-TSB) is 1.6%. In Spain, the involuntary turnover rate is 1.4%. In the international perimeter, the rate increased by 2.5 percentage points, mainly due to staff departures in Mexico.

	2025		2024	
Age range	National	International	National	International
Under 30	3.3%	1.2%	2.4%	3.5%
Between 30 and 50	1.1%	4.6%	0.7%	1.4%
Over 50	1.6%	4.8%	1.6%	2.0%
Total	1.4%	4.3%	1.1%	1.8%

Involuntary turnover rate = ((annual involuntary leavers) / (average workforce)) * 100. Group (ex-TSB) data as at 31/12/2025. 'International' includes Mexico, foreign branches and representative offices. Includes those leaving due to dismissal and other involuntary reasons. Does not include those leaving due to restructuring processes.

	2025		2024	
Gender	National	International	National	International
Men	1.5%	4.1%	1.3%	1.5%
Women	1.3%	4.7%	0.9%	2.1%
Total	1.4%	4.3%	1.1%	1.8%

Involuntary turnover rate = ((annual involuntary leavers) / (average workforce)) * 100. Group (ex-TSB) data as at 31/12/2025. 'International' includes Mexico, foreign branches and representative offices. Includes those leaving due to dismissal and other involuntary reasons. Does not include those leaving due to restructuring processes.

Overall staff turnover

	2025		2024	
Age range	National	International	National	International
Under 30	12.2%	22.2%	12.9%	24.2%
Between 30 and 50	2.6%	11.5%	1.9%	9.9%
Over 50	1.7%	9.1%	1.8%	7.1%
Total	2.9%	11.9%	2.6%	10.7%

Total turnover rate = ((total annual leavers) / (average workforce)) * 100. Group (ex-TSB) data as at 31/12/2025. 'International' includes Mexico, foreign branches and representative offices. Includes those leaving due to dismissal and other involuntary reasons. Does not include those leaving due to restructuring processes.

	2025		2024	
Gender	National	International	National	International
Men	3.8%	11.4%	3.3%	9.9%
Women	2.1%	12.6%	1.9%	11.6%
Total	2.9%	11.9%	2.6%	10.7%

Total turnover rate = ((total annual leavers) / (average workforce)) * 100. Group (ex-TSB) data as at 31/12/2025. 'International' includes Mexico, foreign branches and representative offices. Includes those leaving due to dismissal and other involuntary reasons. Does not include those leaving due to restructuring processes.

⁶⁵ Rate that measures those leaving the Group (ex-TSB) on an involuntary basis.

Types of contract in the Group

Practically all Group employment contracts (99%) are permanent contracts, and only 254 are temporary.

Employees, by type of contract and gender

2025					2024				
Women	Men	Other	Not disclosed	Total	Women	Men	Other	Not disclosed	Total
Number of employees									
10,249	8,487	-	-	18,736	10,257	8,512	-	-	18,769
Number of permanent employees									
10,117	8,365	-	-	18,482	10,162	8,419	-	-	18,581
Number of temporary employees									
132	122	-	-	254	95	93	-	-	188
Number of employees on zero-hour contracts									
-	-	-	-	-	-	-	-	-	-
Number of full-time employees									
10,236	8,482	-	-	18,718	10,247	8,502	-	-	18,749
Number of part-time employees									
13	5	-	-	18	10	10	-	-	20

Group data as at 31/12/2025.

Employees, by type of contract and country

2025					2024				
Spain	United Kingdom	Mexico	Other	Total	Spain	United Kingdom	Mexico	Other	Total
Number of employees									
13,252	4,650	509	325	18,736	13,156	4,761	526	326	18,769
Number of permanent employees									
13,090	4,558	509	325	18,482	13,006	4,723	526	326	18,581
Number of temporary employees									
162	92	0	0	254	150	38	0	0	188
Number of employees on zero-hour contracts									
-	-	-	-	-	-	-	-	-	-
Number of full-time employees									
13,234	4,650	509	325	18,718	13,136	4,761	526	326	18,749
Number of part-time employees									
18	0	0	0	18	20	0	0	0	20

Group data as at 31/12/2025.

Number of contracts, by type:

Type of contract and professional category	2025			2024		
	Permanent	Temporary	Total	Permanent	Temporary	Total
Senior management	909	4	913	865	1	866
Middle management	3,386	4	3,390	3,327	1	3,328
Specialist staff	12,428	179	12,607	12,520	162	12,682
Administrative staff	1,759	67	1,826	1,869	24	1,893
Total	18,482	254	18,736	18,581	188	18,769

Group data as at 31/12/2025.

Number of contracts, by type:

Type of contract and age range	2025			2024		
	Permanent	Temporary	Total	Permanent	Temporary	Total
Under 30	1,516	147	1,663	1,660	112	1,772
Between 30 and 50	10,481	90	10,571	11,018	67	11,085
Over 50	6,485	17	6,502	5,903	9	5,912
Total	18,482	254	18,736	18,581	188	18,769

Group data as at 31/12/2025.

3.1.2 Talent

The Group aspires to provide people working at the Institution with an ideal place in which to develop their professional careers.

To make this possible, the Group has a solid talent management model, a framework of professional opportunities within the Group (internal mobility, promotions and training) and the ability to attract the best external talent for profiles that cannot be found within the Group.

Banco Sabadell's talent management model seeks to manage and develop talent and foster employee loyalty, applying the principles of meritocracy, development of internal potential, and diversity. It requires suitable mechanisms to be in place to identify people's talent and potential, offering them opportunities for career development and professional advancement in the Group.

The Sabadell Talent Appraisal is the starting point for talent management. It is a key process aimed at all Banco Sabadell employees and designed to identify people's talent and potential, give individual feedback and make decisions on career progression during processes such as internal mobility, training or salary reviews. 100% of the appraisals of staff meeting the appraisal criteria have been conducted⁶⁶, 53% of them women and 47% men.

Aligning the talent appraisal process with "Being Sabadell" is a determining factor for the Bank to be consistent in how talent is defined, identified, appraised and developed. It has therefore been structured around three elements (mindset, delivery and engagement), assessing

⁶⁶ Criteria to undergo the Sabadell talent appraisal: staff who were active employees on 31 August and who had no union commitments on 31 August; in the case of employees currently on long-term paid leave, on leave due to long-term incapacity, on secondment, on leave to care for minors with serious illness, or on unpaid leave as at 31 August, these will be invited to undergo the appraisal where their situation began after 1 April.

contribution and performance, skills and potential, and getting to know the professional aspirations of each employee.

For those who manage teams, the key skills expected at each management level are defined based on the three elements of Being Sabadell (mindset, delivery and engagement). This way, those responsible for managing teams all have skills specific to each management level, thereby enriching the model and the appraisal.

After this identification and self-reflection phase, the conversation with line managers is a key opportunity to share mutual feedback about what is expected of the employee, what they bring to their role, what strengths they have and where there is room to improve. The process ends with the creation of an individual development plan for each employee. This appraisal counts as 20% of the individual targets of employees receiving variable remuneration.

It is important to note that many people take part in this appraisal, as it involves not only current line managers giving their opinions and reasons for their appraisal but also feedback from functional or additional managers (for example, previous managers during the year), as well as feedback from management teams where the participants are themselves managers. Lastly, the division's perspective is used to supplement and validate the calibration. In other words, each employee receives at least once appraisal (from their line manager) and that appraisal is validated by someone at least one level up. The number of validations and cross-checks vary according to the size of the division, ranging from 1 to 5 levels.

The appraisal components are broken down according to the three main aspects of Being Sabadell:

- How do they convey their mindset? Do they always act with the Bank in mind, applying their expertise and thinking outside the box?
- How do they deliver? Do they focus on the task at hand, working quickly and efficiently to deliver exceptional outcomes? Do they take into account the quality of that they deliver and the need to comply with regulations?
- How do they engage with others? Do they have a positive attitude that creates a good work environment and do they encourage teamwork?

The Bank's talent recruitment model provides the Institution with the profiles it needs to operate and achieve its targets. One of the main aspects is to foster the professional development of all persons in the Institution. To that end, it prioritises internal recruitment over external recruitment, equal opportunities and process quality, and it is committed to the promotion of people with potential, offering opportunities for internal growth, thus creating professional careers that will be advanced thanks to encouragement and the initiative taken by those who form part of Banco Sabadell to grow and develop.

The conversation between the manager and the employee is the key element to achieve personal and professional growth through feedback, as they agree on an individual development plan to take the necessary action to improve, develop and train.



In addition to the Being Sabadell Talent Appraisal, processes take place that make it possible to enrich the overview of each person, providing additional perspectives:

- **Management Appraisal (180°):** every year, employees give an appraisal of their managers. This process is visible to the line manager and is taken into account in their appraisal. The line manager is also given feedback about the results obtained, while the people manager keeps track of them.
- **Employee Appraisal Committees (EACs):** these meet on annual basis as part of the talent workflow and they are the main forum in which objective, meritocratic and collective decisions are made about the employees in each general/territorial division. The resulting talent maps are key components of internal talent management, which are based on strategic needs and meritocracy. The Employee Appraisal Committees make decisions on appointments and actions in relation to people, and they also share a strategic outlook of the key themes related to talent within each division, to ensure meritocracy is considered from an end-to-end perspective.

Promotions to roles with greater responsibility are validated by internal collegiate bodies, with the support of the People & Sustainability division. In the case of appointments to management positions, following the Employee Appraisal Committee meetings, proposals are submitted to the Managerial Performance Evaluation Committee and the Board Appointments and Corporate Governance Committee.

- **Key Function Holder Substitute Map (KFH Map):** from the point of view of proactive talent management, those within the Institution who are capable of taking on these roles over different time scales are identified in the KFH Map. Different types of profiles are identified:

- Emergency cover: people ready to take over the role immediately if needed.
- Ready soon: people who could take over the role in less than one year.
- Ready 2-3 years: people with high potential who are in the process of developing their skills to take over the role within 2-3 years.
- Future ready: those identified as having capacity to grow in the long term and who are already on the talent radar.

This exercise takes place on an annual basis with the involvement of the People & Sustainability division, the Head of Organisation and Resources of each division, and General Management. It is a robust process that ensures a medium- and long-term vision of talent that is shared with and contributed to by multiple people from across the organisation.

- **Managerial Performance Evaluation Committee (MPEC):** this Committee meets on an annual basis with the Bank's Management Committee in order to decide on changes to senior management staff, approving proposals for joiners and leavers in that group. Promotions to senior management take place taking into account as fundamental criteria the assessment of both the positions and talent, as well as the size of this group, which is in keeping with the structure and the established targets and commitments in relation to diversity.

All actions stemming from these processes are monitored by the Heads of Organisation and Resources (*Directores de Organización y Recursos*, or DORs) and/or by the line managers, and also by Human Capital depending on the actions in question. Halfway through the year, a Mid-Year Review takes place, to check in on how much progress has been made on each action. The DORs have the tools needed to track these actions. In the following year's meetings of the Divisional Employee Appraisal Committee (DEAC), they report on the level of completion of the previously agreed actions.

Other geographies:

In 2025, the subsidiary TSB has continued to strengthen the approach to performance, aligning talent management and performance processes and making succession plans even more robust.

In Mexico, the talent management processes defined earlier for Spain also apply to the subsidiary, which carries out an Annual Appraisal of Performance and Potential and where the Employee Appraisal Committee and Managerial Performance Evaluation Committee meetings take place every year, as does the review of the Key Function Holder Substitute Map, to align it with the Group's talent management model.

In terms of attracting external talent, in Spain, as at the end of December 2025, staff with the following profiles joined the workforce: business development (30%), technology and digital specialists (29%),

financial and regulatory analysts (14%), data specialists (9%), cross-functional and operational experts (7%), and support and other staff (11%).

Similarly, in relation to attracting talent, 330 vacancies were filled internally. Internally, the type of profile for which there were vacancies was varied, with 54% corresponding to business development, 14% to financial and regulatory analysts, 11% to cross-functional and operational experts, 4% to data specialists, 3% to technology and digital specialists, and 14% to support and other staff.

New permanent hires in Banco Sabadell Group based on the breakdown by age and gender are shown below:

Age range	2025		2024	
	National	International	National	International
Under 30	251	23	254	48
Between 30 and 50	207	60	194	116
Over 50	31	5	37	14
Total	489	88	485	178

Group (ex-TSB) data as at 31/12/2025. 'International' includes Mexico, foreign branches and representative offices.

Gender	2025		2024	
	National	International	National	International
Men	280	44	263	113
Women	209	44	222	65
Total	489	88	485	178

Group (ex-TSB) data as at 31/12/2025. 'International' includes Mexico, foreign branches and representative offices.



Furthermore, managers are the cornerstone of the Group's development and they play a fundamental role. They guide people, generating environments of collaboration and agility, developing the business with the customer in mind. The Bank is evolving its culture and ways of working to be a more agile and exciting place to work, and for this to happen it leans on managers as a lever of change, covering all employees in the workforce irrespective of the type of contract they hold.

- **Corporate Management Programme (CMP):** this programme is mainly aimed at people promoted to the role of director or unit head with direct reports and who have held that role for 1.5 years or less, and it contributes to managers' training on skills, collaboration and values. The programme focuses on the culture of the Bank and on a development pathway for the manager in question, based on a meritocratic model that places the best people as leaders and drivers of change and innovation. For the current edition, taking place between October 2025 and March 2026, the programme is structured with a duration of 5 weeks spread out over a period of 5 months. As for the format, the launch took place online, while the remaining sessions and the final closing session took place in person. The itinerary will take approximately 70 hours to complete, shared between training sessions, tutorials and the time spent on the final project. A total of 146 people are enrolled to take part in the programme during this period, with female participation standing at 49.32%.
- **Career Acceleration Programme (CAP):** the goal of this programme is to prepare employees who will lead and tackle the challenges of the future. 2025 marked the third edition of the CAP, with a total of 102 participants (61% of them women). The programme took place over 18 months, beginning in April 2024 and continuing until November 2025. The programme was designed with the aim of accelerating the career development of a group of employees considered to have high potential and who represent the values and attitudes that the Bank seeks to promote, making it easier to attain the necessary diversity that it is seeking to achieve among senior managers. Participants focused on five different areas: Self-awareness (360° questionnaire), Training (by completing four leadership development modules with partner ESADE), Banco Sabadell's perspective - meetings with Senior Management, Mentoring, and New challenges.
- **Senior Manager Development Programme (SMDP):** the programmes designed for senior managers continued to be held in 2025, including this Senior Manager Development Programme, which they complete upon attaining and being nominated for the position of Top Manager. The aim is to support these people as they transition into new roles and to prepare them for the changing business environment, focusing particularly on the specific challenges of their new position. The programme follows a 'learning by doing' approach and aims to build networks within senior management, offering networking opportunities and visibility. Participants are required to visibly take on more leadership than their current role requires them to, conveying the vision and values of the Institution. That is why the key challenges of the programme focus on how to head a team as a leader of managers. Key focus points of the programme:
 - Put decision-making into context from the broadest perspective possible, understanding and building relations with other corporate areas
 - Focus on how to head a team as a leader of managers and as the person fundamentally in charge of the workplace environment and employee commitment;
 - Create safe spaces within their area of responsibility, offer their teams feedback and work on employee development, prioritising this aspect.

It includes a 360° appraisal process and various group coaching sessions, with groups of 5/6 people, to complement the training sessions. The 360° processes are carried out based on the skills previously identified by Banco Sabadell as being necessary for the performance of the managerial role. The partner working on the 360° tool is Korn Ferry International, a leading global partner for management solutions, while the provider of the global programme is Center for Creative Leadership (CCL), a standard-bearer for leadership on an international scale. In 2025, a new edition of the programme took place in 100% on-site format, in which 71 senior managers took part (39% of them women).

- **Management Leadership Programme (MLP):** the fourth edition of this programme took place in October, with 38 enrolled managers appointed as Corporate Directors (37% of them women). This programme focuses on the challenges of the new management role as a transmitter of the Bank's vision and an example to follow when it comes to putting our corporate values into practice. Their leadership is vital for the transformation of our Institution, in relation to the three levers of Being Sabadell: mindset, delivery and engagement.
- **Corporate Mentoring Programme:** the third edition of the programme began in May 2025 and will continue until February 2026. There are 47 participants (79% of them women), including 24 women from the Female Leadership Programme, corresponding to business units. The programme is structured around seven meetings between each mentor and mentee, together with a target-setting guide. Both mentors and mentees receive training in their role so that they may get the most out of the programme, in addition to check-in workshops halfway through the programme.

Other geographies:

TSB continues to actively identify and develop talent, building solid and diverse talent pathways to ensure sustainability in the long term.

- **It continues to implement its Leadership Expectations programme** (launched in 2022), which describes the behaviours expected from all persons holding a leadership position in the Institution, in order to expedite delivery on the strategic plans. This year, new resources were created to support those in leadership positions through times of change and in response to alterations in the approach to performance management in senior levels.
- **Use of the Leading Through Change suite of resources was expanded**, in order to prepare, manage and optimise change with the teams, who leveraged its content and other performance resources contained in the new People Leadership Communities sessions designed for all leaders in Category F+ in 2025.
- The **People Leadership Communities sessions**, based on workshops and designed for all Category F+ managers, evolved in 2025 and are now held in person at key locations, on a quarterly basis. Their content is based on the performance cycle and needs of managers, with the goal of integrating a more consistent performance management culture.
- 80% of those holding a Category F+ manager position at TSB attended these sessions.

In Banco Sabadell Mexico, the goal is to enhance leadership, seeking to align the culture and skills of those in leadership positions. To that end, the following programmes have been implemented:

- **You are the Manager (Eres Manager) Programme:** aimed at all leaders in the organisation with direct reports and designed to provide them with the necessary tools for their professional growth, strengthen their skills for successful team management and align their leadership style with the culture that exists in the Bank.
- **Corporate Mentoring Programme:** designed to enhance the professional development of employees by supporting and guiding the top leaders in the Bank. In addition to transferring knowledge and good practice, the aim of this programme is to inspire, guide and advise them to help them grow and advance their careers.
- **Coaching programmes:** those taking part in these programmes are key leaders who receive personalised support to enhance their growth, by setting clear targets intended to help them adopt new mindsets and behaviours.
- **Training for new leaders:** created for newly appointed leaders and partners who have taken on a role with direct reports, this training aims to provide them with key information pertaining to their new role to help them grasp the internal operating processes of the Bank.



3.1.3 Training

Banco Sabadell Group's training model is built on the following pillars:

- Offer training aligned with the business and needs, both the regulatory needs of the market and the needs of staff members of Banco Sabadell Group.
- Improve the development of people, as drivers of change and transformation.
- Streamline the Institution's training budget so that more people can receive training and to achieve greater transformation.
- Be a standard-bearer within the financial sector in terms of innovation in staff training.
- Be exemplary when it comes to adjusting training schemes to the digital transformation of business lines.

In 2025, the Group has continued to support the business in the challenges and targets that it has set itself, offering new specific training resources for strategic projects that are a matter of priority for Banco Sabadell Group, focusing on aspects such as specialisation programmes for commercial roles, financial current affairs and sustainability. Over the course of the year, the Bank has continued to provide all of the training included in the training pathways for the different business specialists.

Some of these training activities include: PROEDE Programme – a programme for Business Banking Management Expertise (aimed at Business Banking Managers), LERNMI – Insurance Selling Skills (aimed at the branch network), and the Sectoral Financial Analysis Specialisation Programme (aimed at Sectoral Risk Analysts).

Furthermore, regulatory training in Spain continued to be very intensive, accounting for 76% of the total training hours completed in 2025 (vs 82% as at the end of 2024). Satisfaction with training is measured through surveys.

In addition to this mandatory training, annual ongoing training courses are also imparted in relation to the three certifications required to sell banking products (MiFID, IDD and LCCI (Spanish real estate credit law)), which are mandatory for most people in the Bank's branch network. The time dedicated to accumulating training hours required for certification renewal represented more than 59% of the total regulatory training as at the end of 2025 (vs 76% as at the end of 2024).

Furthermore, the most noteworthy projects include the following:

- *Being the Manager. A shared challenge – Recognition for Growth*, which focuses on the importance of recognising achievements.
- *Being the Manager, now more than ever – The Power to Connect*, which focuses on building genuine connections with our partners and on cultivating a sense of belonging and motivation to encourage performance and innovation.

Similarly, in relation to sustainability, support continues to be provided to employees so that they may complete training on this topic, focusing on elements of environmental management, the energy crisis and other content for ongoing training in relation to sustainability.

Introductory training courses remain in place, including "Introduction to Sustainability" and "Sustainable Borrowing", which are available on the Campus training space, with independent learning courses. To date, 97.97% of employees have completed at least one course on this topic.

The "Sustainable Finance Certification" scheme imparted by the Carlos III University in Madrid (UC3M) is also available. Its syllabus includes an introduction to sustainability and the ESG framework, the role of banks in sustainable investment, international initiatives, the EU sustainable finance standards, and ESG risk management. It also covers investment funds and sustainable pension plans, green, social and sustainability bonds, and the creation of sustainable investment

97.97%

Employees completed Sustainability training

portfolios. Further content includes impact investing, the carbon footprint and ESG risk assessment methodologies.

The Annual Staff Training Plan is the basis for the development of Banco Sabadell's human team. Staff education and training are very important to the Institution, which is why 97.0% of the Bank's employees received training during 2025, completing a total of 695,488 hours of training at the Group level (equivalent to an average of 38.3 hours per person).

In 2025, in Spain, 24% of the training received was voluntary, compared to 18% in 2024.

Training received	2025	2024
Employees who received training (%)	97.0 %	97.9 %

Active employees as at 31/12/2025. Training data refers to the entire Group.

Average training expense	2025	2024
Average training expense per employee	€599	€526

Active employees as at 31/12/2025. Training data refers to the entire Group.

Total hours of training and average of each professional category	2025		2024	
	Hours of training	Average hours	Hours of training	Average hours
Senior management	32,937	38.0	35,785	42.8
Middle management	147,499	44.4	149,730	45.8
Specialist staff	466,227	38.2	508,188	41.1
Administrative staff	48,824	27.1	49,772	26.4
Total	695,488	38.3	743,474	40.5

Active employees as at 31/12/2025. Training data refers to the entire Group.

Total hours of training and average of each age range	2025		2024	
	Hours of training	Average hours	Hours of training	Average hours
Under 30	86,443	53.1	91,421	52.6
Between 30 and 50	385,155	37.4	438,864	40.3
Over 50	223,889	35.8	213,189	37.1
Total	695,488	38.3	743,474	40.5

Active employees as at 31/12/2025. Training data refers to the entire Group.

Total hours of training and average of each gender	2025		2024	
	Hours of training	Average hours	Hours of training	Average hours
Men	321,001	38.9	339,817	40.7
Women	374,486	37.7	403,658	40.3
Total	695,488	38.3	743,474	22.5

Active employees as at 31/12/2025. Training data refers to the entire Group.

Lastly, since 2021 the Bank has had the following goals set for 2025 in the Spain perimeter to continue driving forward the development of talent:

- Maintain overall level of satisfaction with training above 80%. The level of satisfaction was 84% in 2021 and 90% in 2025.
- Keep employee training completion rate above 95%. In 2021, 98% of employees had received training during the year, while in 2025 this figure was 97%.

In addition, the Bank is in the process of setting new goals for 2030.

Other geographies:

In the UK, in 2025 TSB has focused on implementing its Future Skills and Skills Based Organisation strategies through:

- **A specialist data analytics platform (Kubicle):** TSB has partnered with Kubicle to create and roll out learning pathways specialising in data for 500 employees, adapted to the requirements of each role. In seven months, over 4,300 courses were completed through more than 4,900 hours of training.
- **Tech skills platform (Pluralsight):** In 2025, 150 employees from the CIO unit were given access to Pluralsight, an IT and Cloud skills development platform. Thus far, a total of 859 hours of learning have been logged and 605 courses have been completed.
- **Apprenticeships for managers and employees:** Two new cohorts began in 2025: one for Aspiring Data Technicians, with 21 employees, and the other for a Leadership Diploma aimed at 24 managers.

To further strengthen its learning and development tools, TSB's Skills Framework has been used to identify which technical skills are critical for the various roles in TSB through the new Skills Navigator tool, which helps employees to reflect on their own skills in their current role and explore career opportunities.

In Banco Sabadell Mexico, the annual training plan includes all of the courses on regulatory content required by the regulator, which all staff are required to complete, and in some cases it also includes specialist courses for Identified Staff members on the operation and management of the various systems. The main goal is to ensure compliance and alignment with all of the Bank's internal processes.



3.1.4 Diversity

The Group views diversity as a valuable source of corporate wealth and promotes actions to cultivate it.

To that end, Banco Sabadell is committed to fostering workplace environments in which people are treated with respect and dignity, seeking to further the professional development of its workforce and ensuring equal opportunities in its candidate selection, staff training and promotion processes, offering a workplace environment that is free from any form of discrimination based on gender, age, sexual orientation, religion, ethnicity or any other personal or social circumstance.

The distribution of Banco Sabadell Group employees by age is shown below.

Age range	2025			2024		
	Men	Women	Total	Men	Women	Total
Under 30	869	794	1,663	913	859	1,772
Between 30 and 50	4,597	5,974	10,571	4,824	6,261	11,085
Over 50	3,021	3,481	6,502	2,775	3,137	5,912
Total	8,487	10,249	18,736	8,512	10,257	18,769

Group data as at 31/12/2025.

In terms of gender diversity, the Bank's workforce is diverse and balanced, with women accounting for 54.7% as at December 2025. The representation of women in management positions is the main action lever to reduce the gender pay gap. It consists of increasing female presence in all areas of the organisation, ensuring the absence of discrimination and guaranteeing equal opportunities.

At present, the foundations of the strategy in terms of Diversity, Fairness and Inclusion are set out in the internal procedure on Diversity, Fairness and Inclusion, which is aligned with the Group Sustainability Policy, which in turn integrates the DFI strategy and establishes the management and control framework. We have a governance model that strengthens internal dialogue, coordination and control in the execution of processes, as well as information for decision-making. We also have an action plan with control measures that identifies initiatives and incorporates management KPIs to ensure commitment to all types of diversity in an all-encompassing way.

In addition, we have the third Equality Plan, which was renewed in 2022 with the agreement of 100% of workers' legal representatives, but the Institution has been treading this path since 2010, adapting to regulations and remaining at the forefront and ahead of the challenges posited by society in this field in order to report better results and strengthen the culture of 'Being Sabadell'.

Similarly, in 2025, Banco Sabadell has remained committed to the internal and external communication and dissemination of all the measures taken in terms of diversity:

- Actions during Equality and Diversity Week, in order to recall the Bank's commitment to creating an environment in which people can express themselves as they are and in which diversity is viewed as an indispensable requirement to be a more competitive and innovative organisation.
- In May, the third edition of the Female Leadership Programme was launched, which promotes the professional development and career plan of women with high potential, in order to create a pool of female talent ready to take on more responsibility so as to foster women's promotion to management positions. The edition includes a programme to develop one's Personal Brand, Management and Leadership skills, with support from mentors.
- Activities have been carried out in which actions were aimed at all persons in the organisation and which took place both in-person and in blended format. Among other things, actions were taken to highlight internal resources that address the topics of equality and diversity, such as "*I Am Remarkable*" (workshops designed to motivate women to promote themselves, to question social perceptions of self-promotion and to reflect on the barriers that prevent professional achievements and aspirations from being voiced), training on diversity, fairness and inclusion, and the Equality and Diversity space.
- Every year, to mark the World Day for Cultural Diversity, the Bank showcases the diversity of its workforce from a different angle: the diversity of cultures, origins and nationalities that make up the team, the diversity of languages in which staff interact, and the diversity of the customers whom it serves in different countries.
- At an external level, Banco Sabadell is part of the steering group behind the Women in Banking (WIB) project, an initiative designed to share best practice among banks in Spain and promote a network of women within the banking industry. The aim of WIB is to lead and bring about a meaningful change in the way women are valued in decision-making roles within the Spanish banking industry. The initiative has the support of eight financial institutions present in Spain and of the Spanish Banking Association (Asociación Española de Banca, or AEB).
- Banco Sabadell is also an active participant of external events, such as Empowering Women's Talent, Diversity Day, and the Women's Talent Day event, publicising the SWING initiative.
- The Sabadell Women Inspiration Group (SWING), an initiative promoted by female senior managers at the Bank, aims to have women holding senior management positions mentor women aspiring to those positions. This programme has taken place throughout the year with monthly sessions. Its aim is to empower women at Banco Sabadell and raise awareness of the value of diversity and its benefits. The female senior managers that make up this group are standard-bearers for female talent and female leadership in Banco Sabadell.
- In 2025, the Institution once again renewed the "Equality in the Workplace" (*Igualdad en la Empresa*) seal of distinction from the government of Spain, which it has had since 2017, awarded for its impressive and significant track record in the application of policies for equal treatment and opportunities among its workers, and in terms of gender diversity. Furthermore, the Chief Executive Officer, César González-Bueno, signed the "CEOs supporting diversity" (*CEO por la diversidad*) initiative launched by the Adecco Foundation and the Spanish Confederation of Employers' Organisations (Confederación Española de Organizaciones Empresariales, CEOE).

To ascertain the views of its own workforce, the results of the workplace environment survey are used. Responses can be broken down by gender, to show any differences in the scores given by women and men to the various categories (commitment to sustainability, meritocracy and consistency, management, ways of working, wellbeing, sustainability, equality and diversity, Banco Sabadell's leadership and direction, promotion, work-life balance, and compensation). In general, there are no major differences between the scores given by each gender. They gave fairly similar scores to all categories.

Diversity in the Board of Directors

A total of 14 directors sit on the Bank's Board of Directors. Specifically, as at 2025 year-end, there were six female directors, including five female Independent Directors out of a total of ten Independent Directors and one female Other External Director.

At Banco Sabadell, in 2024, women accounted for 40% of all members of the Board of Directors, with a composition of 15 members. Now, with the 14 current members, this proportion has risen to 43%, attaining this percentage ahead of the timeframes provided in Organic Law 2/2024 on equal representation and balanced presence of women and men, and fulfilling the Bank's commitment stated in the document

Sabadell's Commitment to Sustainability for 2024, which it still fulfils in 2025. Women also account for 50% of Independent Directors on the Board, amply complying with the Directive of the European Parliament and of the Council on improving the gender balance among directors of listed companies and related measures.

In terms of presence of women on Board Committees, the Board Remuneration Committee is chaired by a female Independent Director, and the committee is composed entirely of women. These female Directors are present in all of the Board Committees: In the Board Audit and Control Committee, they account for an ample majority (75%), in the Board Appointments and Corporate Governance Committee they account for 60% of the total, while in the Board Risk Committee the composition is evenly split between both genders and in the Delegated Credit Committee 20% of members are women. In the Board Strategy and Sustainability Committee, women account for 16.67% (on the Strategy side) and 20% (on the Sustainability side).

Diversity in the Board of Directors

	2025	2024
Men	8	9
Women	6	6
Total	14	15

Diversity in Senior Management (Management Committee)

Diversity in Senior Management (Management Committee)

	2025	2024
Men	9	9
Women	3	2

Percentage of Senior Management members (Management Committee)

	2025	2024
Men	75.0%	81.8%
Women	25.0%	18.2%

Diversity in the senior management group

At the Group level, women represent 35.5% of senior managers, increasing by 1.2 percentage points in 2025 and thus continuing with the trend of improvement of recent years. This commitment is fundamental for the Institution's diversity strategy, which seeks to continue increasing gender diversity in management tiers. To achieve this priority objective, it is vital to improve diversity in middle management roles, 42.9% of which were held by women in 2025.

In the case of Spain, the percentage of promotions given to women was 47.7% in 2025 (compared to 50% in 2024), which demonstrates the commitment to improving diversity and the results obtained with the measures put in place.

35.5%

Women in senior management

1.2 points

Increase in 2025

42.9%

Women in management positions

47.7%

Promotions to women

Percentage of women, by professional category

	2025	2024
Senior management	35.5%	34.3%
Middle management	42.9%	42.3%
Specialist staff	57.0%	56.9%
Administrative staff	70.4%	70.7%
Women promoted vs total number of promotions during the year	47.7%	50.0%

Group data as at 31/12/2025, with the exception of promotion figures, which relate to Spain only.

Functional diversity

The Group establishes measures for the adjustment of workstations where required by people with functional diversity, in line with the occupational medicine service's protocols relating to particularly sensitive individuals. The Institution also assists employees with paperwork and formalities at the municipality, autonomous community and State level that help to improve these employees' social welfare beyond a strictly professional sense. Pursuant to the General Disability Law (Ley General de Discapacidad), it implements alternative supported employment measures by hiring services and supplies from special employment centres.

The number of people with functional diversity in the Group as at December 2025 was 280, meaning that employees with functional diversity represent 1.5% of the total.

	2025			2024		
Professional category	Men	Women	Total	Men	Women	Total
Senior management	5	1	6	5	1	6
Middle management	16	12	28	16	8	24
Specialist staff	79	119	198	81	125	206
Administrative staff	10	38	48	11	40	51
Total	110	170	280	113	174	287

Group data as at 31/12/2025.

LGBTI diversity

Since June 2024, Banco Sabadell has had a Plan on Inclusion Measures for the LGBTI community, thereby complying with Law 4/2023 of 28 February for the real and effective equality of trans people and for the guarantee of the rights of LGBTI persons. This plan was implemented almost one year ahead of the deadline set by the regulation, thus reaffirming our commitment to diversity and inclusion. Thanks to the actions taken in recent years, in 2025 we were recognised by Spain's corporate network for diversity and inclusion of the LGBTI community (*Red Empresarial por la Diversidad e Inclusión LGBTI*, or REDI) and by *Actualidad Económica* magazine as one of the top 25 most inclusive companies for the LGBTI community in Spain.

Furthermore, the People & Sustainability division leads and promotes Banco Sabadell's strategy of Diversity, Fairness and Inclusion (DFI) in collaboration with its businesses and support units. Its functions encompass the implementation of specific initiatives and projects, the promotion of measures, and the oversight of the action plan's objectives. Topics of interest are escalated to governing bodies on a recurring basis for information and monitoring.

At present, the foundations of the DFI strategy are set out in the Equality Plan, which is aligned with the objectives of Banco Sabadell's ESG strategy, which in turn are set out in the Institution's Commitment to Sustainability, aspiring to keep moving forward in relation to diversity, gender equality and talent, and establishing specific goals that will transform the Institution, fostering the presence of the female gender in senior management positions and promoting actions with an impact on society.

Some of the actions that the Institution takes to promote diversity in the Institution and in the Board of Directors are set out here below:

- The Institution ensures and monitors, through the Board Appointments and Corporate Governance Committee, compliance with the required qualitative composition of the Board of Directors, assessing the balance in terms of diversity and promoting the presence of the under-represented sex.
- Plan for Effective Equality between Women and Men and the creation of an Equality Representative to monitor and implement the Plan's actions.
- Selection procedures without discriminatory bias.
- Monitoring of the promotion of women and of diversity in the workforce.
- Promotion of the participation of women in professional development and leadership programmes.
- Monitoring of the impact of any salary reviews on the evolution of the gender pay gap.
- Introduction of the Banco Sabadell Group Diversity Procedure.

In this respect, since 2021 the Bank has been pursuing the following targets for 2025 in relation to the Spain perimeter, in order to move forward with diversity in the Institution and to ensure the training and development of talent:

- 40% female membership on the Board of Directors (this target was met in 2024 with the appointment of a new female director). In 2021, women represented 27% of Board members.
- 33% of senior management roles held by women (this target was met in 2024 and as at the end of 2025 they held 35.1%). In 2021, women represented 29.1% of senior managers.
- 41% of middle management roles held by women (this target was met in 2022 and as at the end of 2025 they held 43.4%). In 2021, women represented 38.8% of middle managers.
- Continuous annual reduction of the pay gap. Since 2021, both the pay gap based on average total remuneration and the pay gap based on median total remuneration have been reduced in Spain, the United Kingdom and Mexico.
- Equality in the Workplace Seal of Distinction, which was renewed in 2025 and first obtained in 2017.

In 2025, Banco Sabadell reaffirmed its commitment to the management of female talent and the promotion of gender diversity across all areas of the organisation. The Institution has implemented a cross-cutting indicator oversight system, with specific metrics for each business unit, which has allowed it to monitor indicators on an individual basis according to the talent management needs of each perimeter, under a shared approach based on fairness and the removal of bias.



This comprehensive approach has materialised in three strategic pillars:

- The presence of women in selection and internal mobility processes to fill key roles and management positions, thereby ensuring equal opportunities to access jobs and professional mobility.
- Equality in the development of potential and the talent pool in each perimeter, ensuring that specific actions are taken to foster the growth and visibility of female talent, as well as effective leadership programmes.
- Frequent monitoring of the pay gap, as a leading indicator that ensures the maintenance of a fair remuneration system and enables steady progress to be made towards equal pay.

These actions reflect Banco Sabadell's firm resolve to move towards a more diverse, inclusive and equal organisation, focusing particularly on the continuous improvement of the percentage of strategic positions held by women and on the continued reduction of the pay gap. The Institution thereby upholds its commitment to spearhead change in the financial sector, promoting a corporate culture based on equal opportunities and the development of talent.

Other geographies:

TSB, aiming to develop a truly inclusive culture, continues to promote an intersectional inclusion network backed by executive sponsorship, such as TSB Ability, Ethnicity, Gender Balance, LGBTQ+ and Social Mobility. These networks foster diversity, raise awareness and celebrate individual identities, in an organisation in which 91% of employees believe that the workplace environment values individual differences.

Sabadell Mexico, for its part, is a member of the Diversity and Inclusion Committee of the Association of Mexican Banks (Asociación de Bancos de México, or ABM). Since 2021, it has been certified as one of the Best Places to Work for LGBTQ.

3.1.5 Remuneration policy

Banco Sabadell's remuneration models do not generate a pay gap, and one of the guiding principles of the Group's Remuneration Policy is to ensure a competitive and fair remuneration system, in accordance with benchmark indices, that rewards professional experience and responsibility, irrespective of the employee's gender. The policies are based on equal pay for male and female employees for equal work or work of equal value.

Banco Sabadell's corporate strategy fosters actions in relation to Environmental, Social and Governance (ESG) matters, by incorporating sustainability indicators, weighted at 10%, into the corporate objectives linked to employees' variable remuneration. The social lever establishes KPIs to improve female representation in the management group as a key mechanism to reduce the pay gap. This indicator has been part of its strategy since 2020. Similarly, people who form part of the Group's Identified Staff have a sustainability indicator linked to their long-term remuneration weighted at 20%.

The gender pay gap, with a material impact that affects the Bank's workforce, is one of the priority focus areas of the management team, which launches recurrent mechanisms with the aim of gradually reducing that gap, in fulfilment of the premises of our remuneration models and the guiding principles of the Group's Remuneration Policy.

In addition to ensuring equal pay for equal work or work of equal value, equal opportunities are also guaranteed, as these are a prerequisite for long-term gender-neutral remuneration. This includes, among other things, recruitment policies, career development and succession plans, access to training and the ability to apply for internal vacancies.

In recent years, the measures implemented have been effective, resulting in a gradual reduction of the Group's pay gap:

The monitoring and analysis of the factors and impacts associated with gender equality and equal pay are vital to ensure inclusive and fair working environments. The People & Sustainability division has internal processes for identifying and managing the impact of salary reviews in order to deliver on the corporate commitment of reducing the Institution's gender pay gap. Continuous monitoring, along with frequent reports sent to the Institution's decision-making bodies and annual reports sent to governing bodies for information and evaluation, is an essential prerequisite to achieve the established targets.

In its goal of promoting gender equality among its employees, Banco Sabadell makes the gender pay gap a priority focus area for its workforce management, launching mechanisms and initiatives to gradually reduce that gap, in fulfilment of the premises of its remuneration models and the guiding principles of the Group's Remuneration Policy.

Pay gap based on average total remuneration*

	2025	2024
Spain	20.31%	20.61%
UK (TSB)	28.60%	29.98%
Mexico	23.02%	20.51%
Total	22.47%	23.02%

Pay gap based on median total remuneration*

	2025	2024
Spain	13.81%	13.89%
UK (TSB)	28.68%	26.74%
Mexico	11.36%	11.74%
Total	17.48%	17.13%

* The overall pay gap is calculated as the average pay gap of each country weighted according to the percentage that their workforce represents out of the total. The pay gap has been calculated without considering employees in foreign branches and representative offices, who account for 1.9% of the total workforce.

As at the end of 2025, the gross (unadjusted) gender pay gap in Banco Sabadell Group was 22.47% (average) and 17.48% (median). This indicator is calculated in accordance with Royal Decree 902/2020, in which total remuneration is calculated in real terms (annualised fixed salary, variable remuneration and any salary/non-salary supplements actually received) and represents the difference between male and female salaries in average terms or in median terms in an organisation / professional category.

The gross pay gap indicator does not provide a complete picture of differences in remuneration, nor can it be used to identify potential gender inequalities within the company. To do that, it is essential to employ statistical methods that permit the calculation of the portion of the gender pay gap that cannot be explained by other factors that might influence a person's compensation, such as their individual characteristics and those related to their job. The portion of the pay gap that remains when comparing individuals with similar characteristics whose only difference is their gender is known as the adjusted pay gap.

To address this, in 2023 Banco Sabadell worked in collaboration with the Economics and Business Department of the Pompeu Fabra University on the certification of an econometric model to determine the adjusted pay gap in Spain, with the following results:

Adjusted pay gap in Spain

	2025	2024
Pay gap based on average total remuneration	4.22%	4.80%
Pay gap based on median total remuneration	2.28%	2.64%

If the effect of staff- and job-related characteristics on pay is removed from the basic pay gap, the adjusted pay gap becomes 4.22% based on the average and 2.28% based on the median.

The introduction of additional factors, other than gender, that explain the remuneration reduces the pay gap. The inclusion of specific job-related characteristics goes a long way in explaining the observed pay gap. A more similar gender presence in the different categories and job functions would also contribute to reducing that gap.

The main actions to remediate the gender pay gap are designed to reinforce the alignment and commitment of the entire workforce and to foster female representation in positions with a higher functional value. The main initiatives of 2025 are set out here below:

- Diversity Programmes specific to divisions with less representation:
 - 2025 saw the launch of a new edition of the Female Leadership Programme, which aims to promote the professional development and career plan of women with high potential, in order to create a pool of female talent ready to take on more responsibility so as to foster women's promotion to management positions. The participants in this edition were 24 women from Corporate & Investment Banking, Business Banking and Retail Banking.
- Promotions given in 2025 through Banco Sabadell's Managerial Performance Evaluation Committee, 35% of which were given to women.
- Cumulative promotions as at 2025 year-end given to participants of the Career Acceleration Programme (CAP): 74% of the participants in the first edition were promoted, 64% of the participants in the second edition were promoted, and 28% of the participants in the third edition were promoted. As for Diversity, the percentage of women who received promotions from these three editions was 47.3%.
- Monitoring of pay gap during salary reviews, analysing the impact of any salary reviews on that gap. The People & Sustainability division monitors calculations on an ongoing basis to make decisions that will gradually reduce the gender pay gap. The analysis and its conclusions are discussed at the People & Sustainability division's top-level committee and escalated to the corresponding governing bodies on an annual basis. In 2025, Banco Sabadell did not receive any notifications about its workforce in relation to the pay gap.

Remuneration of the Board of Directors

With regard to average pay, all members of the Board of Directors, both male and female, are remunerated according to the same criterion, i.e. the number of Board or Board Committee meetings in which they participate or, if applicable, that they chair, without any variation among them for any other reason.

Average remuneration of the Board of Directors⁶⁷

	2025		2024	
	Members	Remuneration	Members	Remuneration
Men	8	402,012	9	363,824
Women	4	210,130	5	196,411
Total	12	338,051	14	304,034

Average remuneration is calculated by considering Board members who have served as directors during the entire tax year, excluding Board members who have not served for the full year. Remuneration received for work carried out in the capacity of members of the Board of Directors is calculated excluding any amounts received for management functions and excluding any amounts received for work carried out as members of the Advisory Board. This remuneration includes, as it has done since 2021, additional remuneration for the Non-Executive Chairman for his functions as Chairman of the Institution, Chairman of the Board of Directors and Chairman of the Annual General Meeting, as well as his functions as the most senior representative of the Institution and all other functions attributed to him by law, the Articles of Association or the Board of Directors itself. In 2025, average remuneration for male members of the Board without considering the remuneration for the Non-Executive Chairman was 226,001 euros.



⁶⁷ For further information on the remuneration of members of the Board of Directors, see the Director Remuneration Policy, the Annual Report on Director Remuneration and the Annual Corporate Governance Report published on the corporate website of Banco Sabadell Group (www.grupbancsabadell.com).

<https://www.grupbancsabadell.com/corp/en/corporate-governance-and-remuneration-policy/director-remuneration-policy.html>

<https://www.grupbancsabadell.com/corp/en/corporate-governance-and-remuneration-policy/annual-report-on-remuneration-of-directors.html>

<https://www.grupbancsabadell.com/corp/en/corporate-governance-and-remuneration-policy/corporate-governance-annual-report.html>

Staff remuneration, by professional category, age and gender

Information is given here below regarding the remuneration received for work carried out during the year, broken down by geographical region, and for each professional category and age range.

The calculation of average total remuneration takes into account fixed remuneration as at year-end, variable remuneration, salary and non-salary supplements and benefits, as well as annualised remuneration and remuneration actually paid. This criterion has been applicable in all countries since 2021.

Average total remuneration in Spain*

Professional category	2025			2024		
	M	W	Total	M	W	Total
Senior management	198,056	149,142	180,889	182,477	140,196	168,149
Middle management	84,850	76,518	81,236	80,042	71,157	76,240
Specialist staff	55,858	52,058	53,639	52,203	48,391	49,975
Administrative staff	33,073	30,478	31,219	29,199	28,746	28,897
Total	75,150	59,888	66,931	69,649	55,291	61,922

Data as at 31/12/2025. Average remuneration in euros.

Age range	2025			2024		
	M	W	Total	M	W	Total
Under 30	44,097	43,347	43,772	40,539	39,255	39,972
Between 30 and 50	69,203	58,127	62,910	64,429	53,887	58,441
Over 50	88,565	64,931	76,423	83,186	60,455	71,714
Total	75,150	59,888	66,931	69,649	55,291	61,922

Data as at 31/12/2025. Average remuneration in euros.

*Remuneration has been calculated without considering employees in foreign branches and representative offices, who account for 1.9% of the total workforce.

Average total remuneration in United Kingdom (TSB)

Professional category	2025			2024		
	M	W	Total	M	W	Total
Senior management	343,459	364,477	352,440	359,566	321,269	344,049
Middle management	149,360	139,404	145,181	146,902	139,964	144,050
Specialist staff	74,493	61,297	67,363	71,348	60,043	65,289
Administrative staff	38,855	33,862	35,340	37,486	33,339	34,550
Total	81,008	57,842	67,291	79,729	55,828	65,603

Data as at 31/12/2025. Average remuneration in euros. Exchange rate as at 31/12/2025: GBP 0.8726 = EUR 1. Exchange rate as at 31/12/2024: GBP 0.82918 = EUR 1. Workforce figures only include TSB's workforce; they do not include staff at Banco Sabadell's foreign branch in the UK. 'Senior management' includes executive directors, senior management, general management, corporate directors and top management. 'Middle management' includes directors not included in the 'Senior management' category.

Age range	2025			2024		
	M	W	Total	M	W	Total
Under 30	45,052	39,500	42,099	44,448	40,341	42,238
Between 30 and 50	83,550	62,478	71,231	82,031	60,610	69,554
Over 50	104,921	57,863	74,410	109,479	55,412	74,187
Total	81,008	57,842	67,291	79,729	55,828	65,603

Data as at 31/12/2025. Average remuneration in euros. Exchange rate as at 31/12/2025: GBP 0.8726 = EUR 1. Exchange rate as at 31/12/2024: GBP 0.82918 = EUR 1. Workforce figures only include TSB's workforce; they do not include staff at Banco Sabadell's foreign branch in the UK.

Average total remuneration in Mexico

Professional category	2025			2024		
	M	W	Total	M	W	Total
Senior management	254,631	171,837	229,497	237,443	167,483	214,525
Middle management	65,394	62,419	64,246	60,855	57,836	59,687
Specialist staff	28,613	25,476	27,366	26,517	24,032	25,529
Administrative staff	0	0	0	0	0	0
Total	77,653	59,779	70,852	71,390	56,748	65,772

Data as at 31/12/2025. Remuneration in euros. Exchange rate as at 31/12/2025: MXN 21.118 = EUR 1. Exchange rate as at 31/12/2024: MXN 21.5504 = EUR 1. Remuneration figures do not include expatriated staff or staff at Sinia Capital, S.A. 'Senior management' includes executive directors, senior management, general management, corporate directors and top management. 'Middle management' includes directors not included in the 'Senior management' category.

Age range	2025			2024		
	M	W	Total	M	W	Total
Under 30	38,330	32,409	36,062	31,718	28,819	30,680
Between 30 and 50	71,156	59,920	66,679	68,248	58,137	64,161
Over 50	141,929	93,370	129,789	142,575	96,491	129,774
Total	77,653	59,779	70,852	71,390	56,748	65,772

Data as at 31/12/2025. Remuneration in euros. Exchange rate as at 31/12/2025: MXN 21.118 = EUR 1. Exchange rate as at 31/12/2024: MXN 21.5504 = EUR 1. Remuneration figures do not include expatriated staff or staff at Sinia Capital, S.A.

Average fixed remuneration is calculated considering fixed remuneration as at year-end. This criterion has been applicable in all countries since 2021.

Average fixed remuneration in Spain*

Professional category	2025			2024		
	M	W	Total	M	W	Total
Senior management	130,140	107,654	122,248	126,832	103,328	118,867
Middle management	62,476	56,297	59,795	59,512	53,341	56,871
Specialist staff	45,702	42,704	43,951	43,773	40,628	41,935
Administrative staff	28,601	27,094	27,524	26,711	26,726	26,721
Total	57,033	47,457	51,876	54,361	44,860	49,248

Data as at 31/12/2025. Average remuneration in euros. 'Senior management' includes executive directors, senior management, general management, corporate directors and top management. 'Middle management' includes directors not included in the 'Senior management' category. In Spain, roles classified as technical roles are included in the 'Specialist staff' category, in accordance with the Collective Bargaining Agreement for Banks.

Age range	2025			2024		
	M	W	Total	M	W	Total
Under 30	37,728	36,964	37,397	35,922	34,845	35,446
Between 30 and 50	53,188	45,787	48,984	50,579	43,441	46,525
Over 50	65,558	51,524	58,348	63,639	49,120	56,311
Total	57,033	47,457	51,876	54,361	44,860	49,248

Data as at 31/12/2025. Average remuneration in euros.

*Remuneration has been calculated without considering employees in foreign branches and representative offices, who account for 1.9% of the total workforce.

Average fixed remuneration in United Kingdom (TSB)

	2025			2024		
Professional category	M	W	Total	M	W	Total
Senior management	230,236	210,480	221,795	232,464	211,514	223,976
Middle management	114,204	105,940	110,735	115,506	109,244	112,932
Specialist staff	56,754	46,460	51,193	54,885	45,934	50,088
Administrative staff	29,682	25,523	26,754	29,235	25,492	26,585
Total	60,730	42,660	50,030	60,117	42,231	49,546

Data as at 31/12/2025. Average remuneration in euros. Exchange rate as at 31/12/2025: GBP 0.8726 = EUR 1. Exchange rate as at 31/12/2024: GBP 0.82918 = EUR 1. Workforce figures only include TSB's workforce; they do not include staff at Banco Sabadell's foreign branch in the UK. 'Senior management' includes executive directors, senior management, general management, corporate directors and top management. 'Middle management' includes directors not included in the 'Senior management' category.

	2025			2024		
Age range	M	W	Total	M	W	Total
Under 30	35,192	30,586	32,742	35,255	31,424	33,193
Between 30 and 50	63,089	46,326	53,289	62,343	46,012	52,831
Over 50	76,199	41,391	53,630	79,319	40,982	54,295
Total	60,730	42,660	50,030	60,117	42,231	49,546

Data as at 31/12/2025. Average remuneration in euros. Exchange rate as at 31/12/2025: GBP 0.8726 = EUR 1. Exchange rate as at 31/12/2024: GBP 0.82918 = EUR 1. Workforce figures only include TSB's workforce; they do not include staff at Banco Sabadell's foreign branch in the UK.

Average fixed remuneration in Mexico

	2025			2024		
Professional category	M	W	Total	M	W	Total
Senior management	154,945	101,259	138,647	143,242	100,087	129,105
Middle management	43,475	41,628	42,762	41,365	39,182	40,521
Specialist staff	20,896	18,397	19,903	19,793	17,569	18,909
Administrative staff	0	0	0	0	0	0
Total	50,411	39,151	46,127	46,872	37,604	43,316

Data as at 31/12/2025. Remuneration in euros. Exchange rate as at 31/12/2025: MXN 21.118 = EUR 1. Exchange rate as at 31/12/2024: MXN 21.5504 = EUR 1. Remuneration figures do not include expatriated staff or staff at Sinia Capital, S.A. 'Senior management' includes executive directors, senior management, general management, corporate directors and top management. 'Middle management' includes directors not included in the 'Senior management' category.

	2025			2024		
Age range	M	W	Total	M	W	Total
Under 30	25,899	21,941	24,383	22,831	20,832	22,115
Between 30 and 50	46,851	39,397	43,881	45,415	38,541	42,637
Over 50	87,680	58,483	80,381	87,411	60,400	79,908
Total	50,411	39,151	46,127	46,872	37,604	43,316

Data as at 31/12/2025. Remuneration in euros. Exchange rate as at 31/12/2025: MXN 21.118 = EUR 1. Exchange rate as at 31/12/2024: MXN 21.5504 = EUR 1. Remuneration figures do not include expatriated staff or staff at Sinia Capital, S.A.

Banco Sabadell calculates the annual total remuneration ratio as the ratio of total remuneration of the highest-paid individual (including Executive Directors from 2025 onwards) to the median/average annual total remuneration of all employees. Total remuneration is calculated according to the specifications of Royal Decree 902/2020, applicable in Spain, whose criteria have been extrapolated to other geographies, considering fixed remuneration in annualised terms and all other components based on the sum actually received in the past 12 months. This criterion is applied in a uniform way, both in the calculation of this ratio and in the indicators relating to the pay gap.

Median/average annual total remuneration for all employees (excluding the highest-paid individual) is obtained by taking the weighted average of the median/average remuneration of each geography according to the weight of the workforce of each country, without applying correction factors linked to the cost of living.

In 2025, the remuneration of the highest paid individual was 73.17 times higher than the median remuneration paid to all other employees, while in 2024, considering Executive Directors also, it would have been 48.51 times higher.



3.1.6 Workplace environment and organisation

3.1.6.1 Work-life balance

The Group's workforce has at its disposal a series of work-life balance measures that are set out in the Equality Plan and in the Guide to Work-Life Balance Measures.

These measures seek to ensure that the workforce has a good work-life balance and to establish a framework for flexible working hours that can be used to improve the balance between personal, familial and professional interests under equal terms for both women and men.

All employees of the Bank have at their disposal the aforementioned Guide to Work-Life Balance Measures, which lists, clearly and simply, the various work-life balance measures that staff can access; it is published in the Equality and Diversity space of the corporate intranet. Some of these measures are the following:

- Option to apply for extended leaves of absence or special permissions for unremunerated leave, improving on that provided in Article 36.2 of the Collective Bargaining Agreement for Banks (CBA).
- Unremunerated reductions of working hours, as set out in Article 37.6 of the Workers' Statute (WS) and Article 35 of the CBA, aimed at those who as legal guardians are directly responsible for a minor under the age of 12, for a disabled person, or for a family member who, due to their age or due to an accident or illness, cannot take care of themselves.
- Remunerated reduction of working hours, of one hour per day over a two-month period, in order to care for a child under the age of 12 or who due to illness or a very serious accident requires hospitalisation.
- Flexibility to adapt working hours (start and finish times) to meet the needs of those responsible for the care of children below 14 years of age, or who must care for family members up to second degree of kinship or by marriage who are disabled or above 65 years of age.
- To contribute to the protection of maternity and paternity rights, leaves of absence for the birth and care of a child are guaranteed, as are leaves of absence to care for nursing children, offering the option to take this nursing leave through 15 working days of remunerated leave subsequent to any period of contractual suspension due to the birth, adoption, guardianship or foster care of a child. The duration of the leave of absence for the birth or care of a child will be equivalent to the duration of the leaves of absence taken in accordance with that provided in Articles 48.4, 5 and 6 of the Workers' Statute, with a total of 19 weeks, 6 of which will be mandatory, uninterrupted and comprise full working days, to be taken immediately following the date of the birth; 11 weeks may be taken, in weekly periods, either in one single block or in separate blocks, during the 12 months following the date of the birth; the remaining 2 weeks can be taken at any time until the child turns 8.
- Paid leave to attend medical appointments and diagnostic tests of the employee or their first-degree relatives, to join children actively undergoing cancer treatments, or to attend medical appointments and diagnostic tests of the employee where they are actively undergoing cancer treatments.

100% of employees had access to leave for family reasons⁶⁸. The total number of people requesting such leave was 320, specifically 195 men and 125 women⁶⁹.

Banco Sabadell also offers its employees Individual Training Leave (ITL) to carry out training actions that are recognised by means of an official qualification or accreditation. The training must be aimed at developing or adapting the employee's technical and professional qualifications or at promoting their personal development. Employees are entitled to a maximum of 200 paid working hours per academic or

⁶⁸ Leave for family reasons includes leave for the birth or care of a child (which includes birth, adoption, guardianship with the intention to adopt, and foster care).

⁶⁹ The figure is provided as a number rather than a percentage, as the percentage is not meaningful.

calendar year for each individual training leave, depending on the duration of the training to be carried out.

In addition, all employees have the right to receive a school allowance for their children, which is paid at the beginning of the academic year for each child in school between the ages of 0 and 23 years who is economically dependent on the employee in question. For those employees who have a child with a registered physical or mental disability of at least 33%, the maximum age is extended to 26 years.

Employees also have a benefits system linked to the flexible compensation system which allows them to optimise their remuneration by applying for certain products through the payroll, such as "Flex Daycare", which they may use to earmark part of their salary to pay for childcare whilst obtaining tax benefits.

The corporate buildings at Sant Cugat del Vallés, Madrid and Sabadell have a lactation room available for use by female employees who choose to combine pumping breastmilk or breastfeeding with their work life. This lactation room can be freely accessed throughout the day.

Banco Sabadell gives its workforce access to a tool called "My Workday" (*Mi Jornada*), in order to comply with the provisions of Royal Decree-Law 8/2019 on keeping daily records of working hours, and with the Agreement on Keeping Working Time Records at Banco Sabadell, signed on 27/02/2020, where each worker is required to keep a record of the start and finish times of their working day. The Bank also continues to promote measures to enhance flexibility, such as telework and flexitime arrangements. The workforce can change their effective working hours at their discretion and with flexibility in order to balance their needs for a work-life balance with the needs of the service. In corporate buildings, for areas covered by the Collective Bargaining Agreement for Banks, the blended model under which staff can work from home for a maximum of six days per month remains in place; uptake of that model is voluntary and not contractually regulated.

Furthermore, when applying the 25th Collective Bargaining Agreement for Banks (2024-2026) and prevailing regulations (Workers' Statute), the Institution ensures:

- Maximum annual working hours: 1,700 hours
- Daily records of working hours for control purposes
- Limitation of overtime hours, in accordance with the Workers' Statute (maximum of 80 hours/year) and the provisions set forth in the Collective Bargaining Agreement for Banks, as working overtime is considered to be an unadvisable practice, barring any exceptional circumstances in which this may be necessary for substantiated reasons of the business organisation, with any overtime requiring the Company's prior authorisation. In any case, any overtime is done voluntarily at the discretion of the worker.
- Paid annual leave: 31 business days, according to the agreement to improve company benefits in Banco Sabadell of 24 November 2023 ("*Acuerdo de Mejora de Beneficios Sociales en Banco de Sabadell de 24 de noviembre de 2023*") signed with workers' legal representatives. This agreement improves on that provided in prevailing regulations.
- Advance notice of collective redundancies: Compliance with the periods and procedures established in prevailing regulations (Workers' Statute and Royal Decree 1483/2012), including minimum consultation periods with workers' legal representatives, guaranteeing transparency, social dialogue and compliance with legislation.

3.1.6.2 Health and safety

Banco Sabadell Group adopts a policy of prevention and continuous improvement of people's working conditions and health that covers 100% of those working at Banco Sabadell Group.

This preventive action is set in motion through the Prevention Plan, the aim of which is to ensure the integration of occupational hazard prevention in the structures of Banco Sabadell Group companies. The Plan is approved and reviewed by the State Health and Safety Committee (a collegial body with both representatives of the company and legal representatives of the workforce).

In 2025, the Comprehensive Health and Wellbeing Plan was further developed, with the aim of expanding and optimising the availability of resources and benefits to integrate conduct that fosters healthy habits and to improve the experience of the workforce in terms of their mental and emotional wellbeing, so as to foster a workplace environment that is good for their mental balance.

Based on the understanding of health as a state of complete physical, mental and social wellbeing, not just the absence of conditions or illnesses, all of the initiatives in this framework have been grouped together under Sabadell Life into four key pillars: physical wellbeing, mental and emotional wellbeing, financial wellbeing, and social wellbeing, all accessible from the corporate computer or corporate mobile phone.

The main new feature worth mentioning is the implementation of a Health Ecosystem, which offers the workforce free and confidential access to new health resources 24/7 and 365 days a year:

- Telemedicine service, accessible through a chat or video consultation, through which staff can receive a diagnosis and reports and obtain medical prescriptions, if necessary.
- Mental health services, accessible through a chat or video consultation, where they can be linked to a specialised therapist and access mental health resources.
- Telerehabilitation service, accessible through a chat with physical therapists and which can be used to design personalised exercise programmes to treat and prevent injuries.

This resource complements other initiatives that are already available and are designed to comprehensively uphold health and safety, such as:

- A space for mental and emotional health and wellbeing, which includes information about psychosocial risks, guidelines on how to identify and prevent them, as well as a training pathway on mental and emotional health and wellbeing.
- Thematic webinars on mental health, which can be accessed through Sabadell Life, which cover key aspects for the management of wellbeing in a workplace environment.
- Methodology to detect the impact of stress on our health, which is applied during the medical examination, in order to anticipate risks and enhance their prevention.

In order to continue with the progress made, the Institution has designed a management system based on continuous improvement, thereby complying with Law 54/2003 on the reform of the regulatory framework on occupational hazard prevention. This management system regularly undergoes a specific external audit, the last of which took place in 2023. The results of that audit were fully satisfactory, detecting no Non-Conformities (not even minor ones) in any of the audited aspects.

Monitoring absence from work

As part of its management of health and safety, Banco Sabadell monitors absence from work through monthly reports, which include data on prevalence rates, severity rates, and frequency of absences. The data is grouped together by company, territory, age and gender, and makes it possible to detect trends and possible deviations according to the variables analysed. Depending on the results, preventive actions are identified and applied.

General absence from work includes absence from work due to illness with Temporary Incapacity (TI) and without TI for common contingencies (common illnesses, non-work-related accidents) and professional contingencies, such as a Work-Related Accident (WRA) or a Work-Related Illness (WRI).

The prevalence rate (number of employees who have been absent from work / total workforce) in 2025 stood at 5.34% of the workforce (vs 4.97% in 2024).

The severity rate (number of days missed / total working days) in 2025 was 3.25% (vs 2.95% in 2024). Considering the composition of the workforce in terms of gender and age, values below 3.5% are considered to be very satisfactory.

The number of new cases initiated during the month (frequency rate) was 311 cases in 2025 (vs 295 in 2024).

At a sectoral level, according to the latest data available corresponding to 2024, absence from work due to illness stood at 2.95% in the Group compared with 3.32% across the financial sector and 7.91% in the services sector, even when considering that the information provided by mutual insurance companies (sector data) does not include data on illness without temporary incapacity, unlike the data supplied by Banco Sabadell, which does.

Indicators of absence from work in Spain	2025	2024
Total hours (accidents and ill health)	780,370	697,689

Data as at 31/12/2025.

Indicators of absence from work in TSB	2025	2024
Total hours (accidents and ill health)	325,681	331,788

Data as at 31/12/2025.

In Mexico, indicators of absence from work are recorded and reported as general ill health. As at the end of December 2025, a total of 289 days off work had been recorded.

Monitoring the accident rate

One of the fundamental pillars of the management of occupational hazard prevention is the research into, and prevention of, work-related accidents. On becoming aware of an accident, the Joint Prevention Service collects the main data and deals with the official communication. An investigation into the accident is launched. The procedure varies depending on the severity and complexity of the event, determining, if necessary, the preventive and/or corrective actions that should be taken. All of these actions are designed to guarantee the care and subsequent recovery of the person concerned. In 2025, the number was 143 (vs 136 in 2024). No severe accidents were recorded during the period, nor were there any fatalities as a result of work-related accidents.

Work-related accidents

Types of accident in Spain	2025			2024		
	M	W	Total	M	W	Total
Work centre	9	32	41	8	36	44
Whilst commuting	32	46	78	26	40	66
Travel during workday	5	17	22	2	22	24
Other work centre	1	1	2	1	1	2
TOTAL	47	96	143	37	99	136

Data as at 31/12/2025. There were no occupational diseases in 2025 or in 2024.

Work-related accidents	2025			2024		
	M	W	Total	M	W	Total
Work-related accidents with leave	22	37	59	16	46	62
Work-related accidents without leave	25	59	84	21	53	74
TOTAL	47	96	143	37	99	136

Data as at 31/12/2025.

Work-related accidents in Spain	2025			2024		
	M	W	Total	M	W	Total
Total hours	6,334	13,078	19,413	5,584	14,667	20,251
Total days	1,360	2,808	4,168	1,199	3,149	4,348
Frequency rate ⁷⁰	0.47	1.7	1.11	0.28	1.97	1.17
Severity rate ⁷¹	0.13	0.24	0.19	0.11	0.27	0.2

Data as at 31/12/2025. To ensure the comparability of the results, the figure corresponding to 2024 has been recalculated applying the same methodological criterion used for the 2025 figure. In the case of the frequency rate, the formula has been amended to consider only accidents that resulted in absence from work, without counting those occurring whilst commuting or the hours actually worked. Similarly, for the severity rate, the 2024 figure has been recalculated considering the number of days lost based on the hours actually worked. The accident rates (hours or working days lost) do not include three people currently off due to temporary incapacity as a result of the DANA flash floods. These leaves are considered exceptionally as a situation similar to a work-related accident, but only for the purpose of the corresponding economic benefit.

Other geographies:

In terms of subsidiaries, TSB, in compliance with UK legislation, does not keep a record of accidents, while Mexico did not record any accidents in 2025.

Banco Sabadell Mexico received the ELSSA accolade given by Mexico's social security institute, IMSS, to organisations with a safe and healthy workplace environment. It also received the Zero Accidents certificate from IMSS, granted to companies that have maintained or improved the safety conditions of their workplace.

3.1.6.3 Trade union rights and right of association

Banco Sabadell Group guarantees the basic rights of all its employees in relation to freedom of association and collective bargaining. The Group's Responsible Banking and Sustainability Policy considers it vital to observe standards, working conditions and rights of employees, such as their freedom of association and union representation, which are set out in standards, collective bargaining agreements and other agreements signed with the corresponding workers' legal representatives. All this within the framework of consensus with trade unions, using dialogue and

⁷⁰ (No. of accidents resulting in absence from work (not including those occurring whilst commuting) / Hours actually worked)* 1,000,000.

⁷¹ (No. of days lost due to accidents resulting in absence from work (not including those occurring whilst commuting) / Hours actually worked)* 1,000.

negotiation to address all issues, differences and conflicts within the Group. Dialogue takes place on a continuous basis through the Labour Relations division, addressing topics informally so as to speed up the process. There are also other channels that can be used to contact workers' union representatives, defined in the quarterly meetings held by the State Health and Safety Committee and the semi-annual meetings of the Equality Plan Monitoring and Assessment Committee.

One of the main duties is to represent workers in occupational health and safety committees. Furthermore, the Group proactively promotes collective bargaining, together with the head of the Labour Relations division, who guarantees such collaboration, as generally speaking specific labour agreements are drawn up with workers' legal representatives. The elected trade union representatives are allocated hours from their normal working hours to engage in their trade union activities.

Workers' representatives are voted in every four years, in accordance with the guidelines set forth in prevailing legislation and the implementing agreement enforced in the Spanish Banking Association (Asociación Española de Banca, or AEB), together with the most representative State union sections of the Spanish banking industry. The results of the union elections determine the composition of the various Works Councils, as well as staff delegates, who are the main points of contact representing the company and who take part in collective bargaining negotiations.

The Bank has nine trade union sections in Spain, which represent at least one person for each union section, and which operate on a State-wide and autonomous community basis. Banco Sabadell maintains continued and fluid dialogue with workers' legal representatives, in an environment that is conducive to dialogue and complete impartiality, so as to facilitate collective bargaining and resolve the issues identified in legislation, and to address any other matters that the company and union representatives consider to be material for its activity and the workplace environment.

In Spain, 100% of workers are covered by the Collective Bargaining Agreement for Banks, while in all other countries, the prevailing legislation in each country is applied. In addition, in Spain, 100% of the workforce are represented by workers' legal representatives.

In the United Kingdom, TSB continues to maintain a fluid and direct relationship with trade unions, renewing its agreement with Accord and Unite in 2023, which establishes the collective bargaining agreements. The agreement was reached with 90% of the workforce represented. This relationship has allowed the management team to work in an open and collaborative manner to consult with trade union representatives on all issues affecting TSB's relationship with its staff, and to assess possible initiatives to make improvements to the workforce and introduce organisational changes.

In the subsidiary in Mexico, there is no relationship between people and union representatives.

Collective bargaining coverage			Social dialogue
Coverage rate	Employees – EEA	Employees – non-EEA*	Workplace representation (EEA only)
0-19%			
20-39%			
40-59%			
60-79%			
80-100%	Spain	United Kingdom	Spain

Note: European Economic Area (EEA)

*Excludes Mexico as it represents less than 10% of total employees.

There are no agreements with employees for representation by a European Works Council (EWC), a *Societas Europaea* (SE) Works Council, or a *Societas Cooperativa Europaea* (SCE) Works Council.

3.1.7 Dialogue with employees

The Group has various mechanisms in place for communicating with staff and listening to their concerns, which are key to anticipating their needs and building a great place in which to develop a professional career.

Assistance and Grievances Office:

Banco Sabadell has an Assistance and Grievances Office (AGO), through which it aims to be more mindful of and closer to the entire workforce, attempting to resolve any doubts that may arise in connection with the processes and topics dealt with by the People & Sustainability division, which include: Management, Professional Career, Compensation, Diversity, Leadership Training, Work-Life Balance Consultant, Transfer Requests, My Benefits Portal, Occupational Hazard Prevention (work-related accidents, medical examinations, etc.), Labour Relations (leaves of absence and special permissions, pension plans, etc.) and Social Relations (assistance for school fees, loans, etc.).

The Assistance and Grievances Office (AGO) is accessed through the internal portal available to the entire workforce. The office autonomously answers the questions submitted by employees, keeping the necessary records and following up on queries and complaints. Those that require additional specialised management are forwarded to a second management level of the People & Sustainability division according to the topic in question for resolution. This year, 45,165 queries were received, while maintaining a high level of quality of service, obtaining a satisfaction rating of 4.38 out of 5.

FlashIN newsletter:

In Spain, the *FlashIN* newsletter continues to be issued and sent to all employees once a week, providing information of interest to staff, as well as guidance and contextual information about the Institution and the sector. In addition, the internal news portal, *IN Sabadell*, is a crucial element of information and cohesion that provides key information on complex issues generated by the external environment, and on change processes that occur within the organisation itself. This portal, as well as the fortnightly “You are the Manager” (*Eres Manager*) publication, also includes flash surveys to raise a relevant topic and capture people’s thoughts about it.

“The Bank we aim to be” survey:

“The Bank we aim to be” (*El Banco que queremos ser*) is a survey that provides comprehensive information about the commitment of staff to the Institution’s current courses of action and future prospects. The results obtained from the survey remained steady and in line with the good financial performance during the year. Commitment and workplace environment are measured at two different times of the year, measuring the results of the blocks of questions relating to commitment, meritocracy

and consistency, management, ways of working, wellbeing, sustainability, equality and diversity, Banco Sabadell's leadership and direction, promotion, work-life balance and compensation.

The survey is sent out to the entire workforce and participation in the H1 2025 edition was 75%. In general, the survey's results were very positive: there was an improvement across all categories, both in the branch network and in the corporate buildings. The commitment indicator was higher, with 78% responding favourably, thus surpassing the set target of 70%, which shows that the Institution's staff identify more strongly with the company's goals and targets and feel a proud sense of belonging. In Meritocracy and Consistency, it is worth noting the positive ratings given to equal opportunities and the level of internal transparency. As for Ways of working, there was an evident improvement in communication with the workforce. Moreover, there was a substantial improvement in the level of confidence in the decisions made by the Bank's leadership and in the criteria for professional promotion. The question relating to wellbeing, This is a mentally and emotionally healthy place in which to work, also showed improvements compared to previous editions, as did the question on work-life balance.

Participation in the H2 2025 edition climbed to 77%. In this second edition, the results were once again very favourable, with a general improvement across the board both in the branch network and in corporate buildings. The level of commitment, which is a key indicator, stood at 80%.

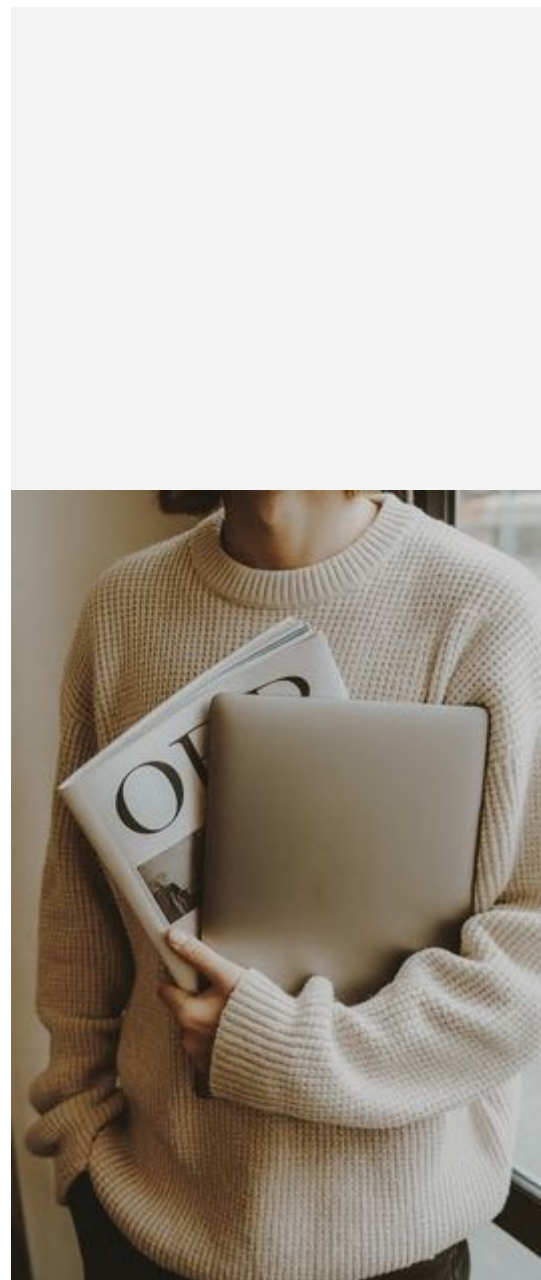
The level of confidence in, and support for, Banco Sabadell's leadership and direction was even higher. In terms of Ways of working, affirmative responses indicating agreement with the statement "This company is doing a good job at keeping its staff informed" represented over 80% of the total, a new record. The scores given to management of meritocracy and consistency and those agreeing with the statement "I can share my points of view with those above me" also improved. The scores given to Equal opportunities and Welfare management once again improved in the latest edition. As for Work-life balance and Equality and diversity, these continued to be scored just as highly as the first time they were measured in 2025.

In addition, building on the approach to always listen to employees, brief surveys (pulse checks) are sent out to a representative sample of the workforce. Specifically, they are sent to a small random sample of employees in order to ascertain their work experience in the Bank at any given time.

Whistleblowing channel:

The Group has an Internal Reporting System for reporting, in general, actions or omissions that could entail a breach of prevailing legislation, of the Group's Code of Conduct or of other internal regulations. Details of this channel can be found in section [4.1.5 Internal Reporting System - Whistleblowing channel](#).

Similarly, reporting persons using the channel in good faith will have, among other things, the safeguards and protections laid down in the Banco Sabadell Group Policy on the Internal Reporting System and Protection of Reporting Persons, details of which are given in section [4.1.1 Code of Conduct](#), and in its implementing procedure, consisting of the absence of any retaliation against anyone who submits a report through the channel.



3.2 Consumers and end-users

Banco Sabadell contributes to the transition towards a more sustainable and cohesive society through ethical and responsible management. As a financial institution, the Bank is firmly committed to data privacy and cybersecurity.

The main courses of action are the following:

- Support customers in the transition to a sustainable economy: to that end, the Institution takes steps to establish decarbonisation pathways, support customers in the transition with specialised solutions for renewable energy, energy efficiency and sustainable mobility, and it also defines sectoral rules that limit controversial activities and/or activities with negative impacts on social and environmental development.
- Offer investment opportunities that contribute to sustainability: in the investor ecosystem, the Bank focuses on increasing opportunities for savings and investment that contribute to sustainability, rolling out a wide range of social, ethical, green and sustainability bonds and funds, both its own and those of third parties.
- Work together for a sustainable and cohesive society: in its commitment to society, the Institution believes that it is imperative to take an active role to improve financial education, drive forward inclusion, minimise vulnerabilities and ensure secure transactions and exchanges of information.

In 2022, the Bank published **Sabadell's Commitment to Sustainability**, a document that discloses the environmental, social and governance-related commitments.

In this respect, the Bank set the following targets to support customers in the transition to a sustainable economy:

- Mobilise €65bn in financial products and services in cumulative terms between 2021 and 2025 in sustainable finance solutions (including green and social loans, sustainability-linked loans, capital markets and social financing). In 2021, the reference value was €11bn. The Bank mobilised over €76bn over the 2021-2025 period, surpassing the established target by more than 17%.
- Grant >€15bn of financing to micro-enterprises in cumulative terms between 2021 and 2025. In 2021, the reference value was €2.9bn. The Bank has granted financing to SMEs and micro-enterprises, mainly through loans and credit facilities, thereby supporting job retention and fostering the development and growth of the business and industrial fabric across each region, totalling more than 13.2 billion euros between 2021 and 2025. This means that over 88% of the target set for that period has been reached.

The social loans target for 2021-2025 was initially defined based on criteria that have been narrowed in recent years to align with the Institution's framework for the issuance of sustainability bonds, focusing on financing activities that promote new jobs, development, and the growth of the business fabric in the most disadvantaged regions, which has consequently influenced the achievement of the target for the period⁷².
- Increase direct investments in innovative and high-impact startups (BStartup Green and BStartup Health programmes) through the BStartup10 vehicle. In 2025, the Bank continued to invest in startups, such as BStartup Green, and a call for proposals was launched for the eighth edition of BStartup Health.
- Reach 10,000 annual recipients of financial education programmes including new sectors of the population (seniors, vulnerable groups, etc.). In 2021, the reference value was 6,300 annual recipients, with the total number of recipients in 2025 being 9,581.
- Reach 2,000 participants in social impact projects. In 2021, the reference value was 1,300 participants, while in 2025, participants numbered a total of 3,100.
- Continue to foster culture and talent by promoting education and research activities through the Banco Sabadell Foundation. In 2025, the Banco Sabadell Foundation continued to conduct initiatives to promote culture and the arts, as well as research and education, focusing particularly on promoting young talent.

⁷² By way of example, in 2025 the adjustment to consider only financing in disadvantaged regions – those with below-average GDP or above-average unemployment rate – is estimated to have had an impact on the volume of financing of -55%.

The Bank is also committed to data privacy and cybersecurity and it has set the following targets to be met in 2025:

- Keep security controls aligned with best practices (ISO 27001 standard, NIST Cybersecurity Framework) and have them reviewed by an independent third party. In this regard, in 2025, the Bank continued to control the cybersecurity risks to which it is exposed.
- Keep security training of employees and partners up to date. In 2025, annual training courses in relation to data protection and cybersecurity continued to be held, which are mandatory for all employees, as well as specific training programmes for the cybersecurity teams.

The targets included in Sabadell's Commitment to Sustainability were set in 2022, using 2021 as the base year.

The setting of those targets involved all of the Institution's teams, designing four pillars or action areas which are at the core of Sustainability in Banco Sabadell, setting various targets to be met in the short, medium and long term by developing the strategic pillars, with firm commitments and a well-defined roadmap.

Once those targets had been established by the various areas, a formal validation of content was required, requesting approval of the commitments by the various areas involved at two levels.

The Board Strategy and Sustainability Committee approved the content of Sabadell's Commitment to Sustainability, as delegated by the Board of Directors.

The Board Strategy and Sustainability Committee, through the Corporate Sustainability Report, a document that contains information about the overall ESG environment in the context of the macroeconomic and regulatory environment, about the Institution's ESG outlook, and about the integration of ESG risks into management arrangements, monitors the priority indicators of Sabadell's Commitment to Sustainability on an ongoing basis.

The Group has allocated the necessary resources (staff and economic) to ensure that all material incidents are managed.

3.2.1 Customer experience and customer care

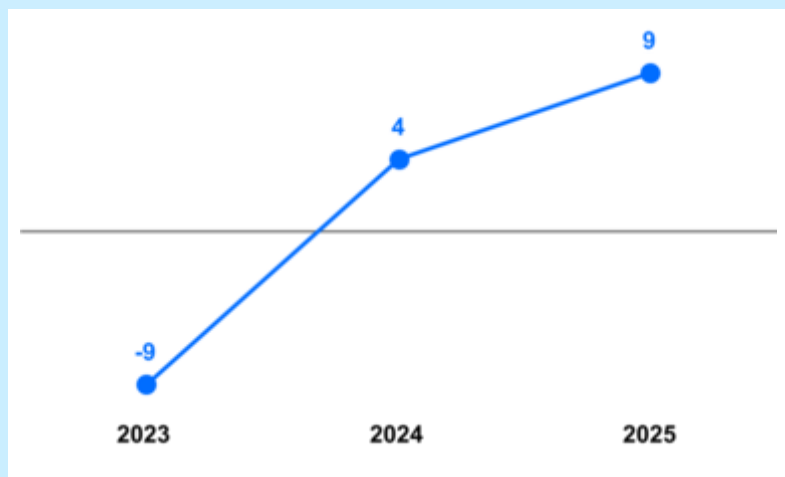
Knowing customers at every stage of their relationship with Banco Sabadell is crucial.

That is why new methodologies are continuously being developed that allow the Bank to listen to what customers are saying, to measure and determine the main reasons for customer satisfaction and dissatisfaction, and to ascertain how near or far it is from meeting customers' expectations. This measurement involves understanding the market, consumers and customers, using a number of different qualitative and quantitative analytical methodologies to that end.

More specifically, Banco Sabadell analyses its customers' experience through ongoing quantitative surveys, such as:

1. Net Promoter Score (NPS). This survey asks customers how likely they are to recommend their main bank and the reasons for their response. To avoid confusion with the NPS measured by external sources, the term CXI (Customer Experience Indicator) is used to refer to internal NPS.

In the case of the CXI, every day a survey is sent to Banco Sabadell customers who have had some form of contact or interaction with the Bank's services or channels. In recent years, the CXI of retail customers has improved considerably. Specifically, in 2025 the survey was sent to more than 1.2 million retail customers (around 30% of the total), and the year-end CXI stood at +9%, 2 percentage points above the target (2025 target: +7%). The following chart shows how the internal CXI has changed in recent years:



2. Satisfaction surveys, conducted monthly. These cover the main points of contact with the Bank and therefore include products (application processes, among others) and channels (branches, relationship managers, digital banking, among others).
3. Branch quality surveys, which continuously evaluate the level of service provided to potential customers at branches, through the mystery shopping technique.
4. Studies of the financial behaviour of Retail Banking customers, Business Banking customers, small businesses and self-employed persons, conducted on an annual basis for Retail Banking customers and every other year for Business Banking customers.

In addition, in order to better understand the environment and the customers within it, the Bank also carries out a qualitative analysis. Specifically, the Bank undertakes various qualitative studies and research projects using different methodologies. The aims pursued include:

- Listening carefully, actively and constantly to what customers have to say, so as to ascertain how they experience their relationship with the Bank at different touchpoints.
- Understanding the expectations, concerns, worries and attitudes of consumers and their current and future needs.
- Identifying the more emotional and less obvious side of consumer decision-making.
- Defining ad hoc value propositions for each type of customer. A variety of techniques are used, ranging from in-depth interviews and segment-specific focus groups to more innovative methodologies based on behavioural economics and the detection of the deepest emotions and motivations of consumers.

Ultimately, the goal is to design courses of action that will improve the experience of all types and segments of customers and consumers and to bring the value proposition in line with the needs and expectations of consumers in general and of Sabadell's customers in particular. The designed actions are scheduled and their implementation is monitored by the specific customer experience committees of the Business Banking and Retail Banking business divisions, which also receive the results of customer opinion surveys.

Customer Care Service (*Servicio de Atención al Cliente*, or SAC)

Banco Sabadell has a Customer Care Service (SAC), which is in charge of handling and resolving complaints and claims brought forward by users of financial services.

In accordance with Order ECO 734/2004 of 11 March, Banco Sabadell has a **Customer Care Service (SAC)**, which is in charge of handling and resolving complaints and claims brought forward by users of financial services. As per its Terms of Reference, the SAC's scope of action includes both customers and users of financial services of Banco de Sabadell, S.A., as well as its associated entities: Sabadell Asset Management, S.A., S.G.I.I.C. Sociedad Unipersonal, Urquijo Gestión, S.G.I.I.C, S.A. and Sabadell Consumer Finance, S.A.U.

The SAC and its head, who is appointed by the Board of Directors, to which reports are sent on at least a semi-annual basis, report directly to the Compliance division and are independent of the Bank's business and operational lines. Its main function is to handle and resolve complaints and claims put forward by customers and users of the financial services of the Bank and its associated entities, under the principles of transparency, impartiality, effectiveness, coordination, speed and security.

In addition, the SAC can issue recommendations or suggestions derived from the analysis of complaints and claims received.

The operation of the SAC is governed by its own Terms of Reference and by the policy document, both of which are approved by the Board of Directors. To ensure accessibility and awareness of these resources, posters have been put up in all of the Bank's branches containing information about the existence of the SAC, as well as its postal and electronic addresses. Access to the Terms of Reference is also provided, thereby ensuring compliance therewith.

As a result of the entry into force, on 3 April, of Organic Law 1/2025 of 2 January on measures for the efficiency of the Public Justice Service, internal procedures have been adapted, as have the criteria for out-of-court resolutions applied when responding to customer complaints. Similarly, following the publication of Law 10/2025 of 26 December governing customer care services, an evaluation of how that Law will impact the SAC's procedures is taking place, as those will have to be adapted within twelve months of it entering into force.

Lodging and processing channels

Customers and users of financial services may lodge complaints through various channels: either in person at branches, through the corresponding printed form, by completing an electronic form, by sending an email, or by posting a letter to the SAC. Once lodged, the complaint or claim is processed in accordance with the Terms of Reference and notice of its resolution is provided within the legally established timeframe. Resolutions sent by the SAC are binding on all units.

Where the customer is not happy with the response received, or if no response is received within the legally established timeframe, they may contact the complaints services of the Bank of Spain or the National Securities Market Commission (CNMV), as appropriate.

Innovation and improvement of the service

Within the framework of the digital transformation strategy, data analytics and artificial intelligence have continued to be used to deal with incoming complaints, to make the process more cost-effective and improve the customer experience, understanding the correlations between the complaints and activities of the various segments.

The role of the SAC in the internal control system

The work of the SAC goes beyond merely handling complaints; it plays a fundamental role in relation to control within the Bank. The SAC continuously analyses data in connection with complaints handling, so as to identify and address any recurring or systemic problems, as well as legal, operational and conduct risks. It evaluates how the business and operational units interact with customers when they bring forward a complaint or claim, and it calls for the procedures concerned to be corrected, determining whether the causes for which complaints are being made might also affect other processes or products, even when no direct complaints have been received in connection therewith. Members of the SAC also take part in product committee meetings, contributing their experience and insights to the process for approving new products and services, in addition to writing regular reports for Management and governing bodies, including reports on the level of implementation of any recommendations set out in previous reports.

Culture of continuous improvement

Banco Sabadell fosters the continuing education of its staff in relation to aspects such as customer care, conflict resolution and the use of new technology, promoting an internal culture of actively listening to customers and learning from any complaints received. The suggestions and inputs received from customers are taken on board to improve the organisation, thus ensuring a constant improvement in the quality of service.

SAC activity

During 2025, the following complaints and claims were received and managed in accordance with Bank of Spain Circular 4/2021 of 25 November:

Complaints received	Volume	
Customer Care Service	62,203	
Customer Ombudsman (*)	216	
Bank of Spain	712	
Spanish National Securities Market Commission (CNMV)	33	
Total complaints received	63,164	

Complaints handled	Volume	Percentage
Resolved in favour of the Institution	20,286	39.0 %
Resolved in favour of the claimant	31,667	61.0 %
Inadmissible due to application of Terms of Reference	10,834	

(*) Customer Ombudsman (a position not designated by the Institution since 31 January 2025)

The drop in the number of complaints is largely explained by the 78.5% reduction in those related to appraisal fees and other arrangement fees, after an exceptionally large volume of these was recorded in 2024.

The above data reflect the SAC's commitment to efficient and transparent management of complaints, ensuring the protection of customer rights and the continuous improvement of internal processes in all of the Bank's associated entities.

In the case of the subsidiary TSB, in 2025 the number of recorded complaints was 64,657. The volume recorded during the same period in 2024 was 58,595 and, therefore, 2025 represents a 10% increase (6,062) on that figure. This increase is mainly explained by the additional complaints received in connection with processes linked to financial crime, which increased by 48% (7,517) year-on-year. Of the total number of complaints, claims and other communications received in 2025, a total of 63,146 (97.7%) were resolved before the end of the year, i.e. before 31 December 2025.

Customer complaints can be sent to TSB through various channels, for example, by phone, by visiting branches, by completing an online form or on the mobile app. Complaints are logged and resolved by the agent who first receives them, where possible. Where that is not possible, they are relayed to the Customer Relations team. This team assigns a person to deal with the cases in question, who resolves complaints about payment services within a period of 15 days and all other complaints within 8 weeks, where possible, as per the guidelines of the Financial Conduct Authority. The complaint is either upheld or not upheld. If the customer is unhappy with the proposed resolution, they may contact the Financial Ombudsman for an independent review.

With regard to Mexico, in accordance with applicable Mexican regulations, the Law on the Protection and Defence of Users of Financial Services (*Ley de Protección y Defensa al Usuario de Servicios Financieros*) and the Provision on Record-Keeping for disclosure to CONDUSEF (*Disposición en Materia de Registros ante la CONDUSEF*), CONDUSEF being the National Commission for the Protection and Defence of Users of Financial Services (Comisión Nacional para la Protección y Defensa de los Usuarios de Servicios Financieros), Banco Sabadell Mexico has its own customer service available to its customers and to users of its financial services, through the Customer Care Centre (*Centro de Atención al Cliente*, or CAC) and the Specialised User Assistance Unit (*Unidad Especializada de Atención a Usuarios*, or UNE). The UNE, which reports directly to the Compliance division and is separate from the Bank's operational and business lines, and the CAC, which as the first point of contact supports the UNE, offer assistance to customers and users of financial services to resolve their queries, requests for clarification⁷³, and complaints. Customers and end users may contact the Institution by telephone, by email, in person, or through the customer service offices and also through the website. There is also a section on the website called "*asistencia*" (meaning 'help'), which lists useful contacts and the process that users should follow so that they may benefit from a fast and appropriate response. As at the end of December 2025, a total of 0 requests for clarification and 18 complaints had been received.

⁷³ Taking into account the definition of "clarification" in Mexico (as provided in Article 23 of the Law on Transparency and Regulation of Financial Services (*Ley para la Transparencia y Ordenamiento de los Servicios Financieros*)), which defines 'requests for clarification' as requests submitted by users using any of the available means of submission in order to obtain an explanation about the operations or services on offer or which they have acquired), requests for clarification are thought to be equivalent to what we call "complaints".

3.2.2 Information transparency

One of Banco Sabadell Group's priority goals is to meet the needs and expectations of its consumers and end-users. In this regard, the Institution promotes transparent information and responsible, straightforward and close communication with its customers.

To that end, it acts in a socially responsible way in its commercial communications, undertaking to engage in lawful, proper, loyal, truthful, clear and transparent advertising, based on respect for people's dignity and the recognition of the rights and interests of consumers, and aligning with the principles of fair competition in business, as established in the Commercial Communication Policy.

Banco Sabadell's Commercial Communication Policy establishes, as a general criterion regarding format and content, that when designing advertising campaigns and each of their constituent advertising components, it will be necessary to consider the nature and complexity of the product or service being offered, the characteristics of the distribution methods used, and the target audience. In this way, it complies with the various legal standards on the recognition and protection of the rights and interests of consumers. Banco Sabadell's Board of Directors is responsible for approving the Commercial Communication Policy. This Policy is available to all employees both on the Bank's corporate website and on the corporate intranet, and its scope of application is all marketing activity carried out by Banco Sabadell in the Spanish territory under any of its commercial brands, including all commercial communications and information aimed at the general public (customers, potential customers, investors, etc.).

In addition, the Bank fosters transparency in the disclosure of information, at all times adopting responsible communication practices that prevent the tampering of data and protect the company's integrity and honour, in accordance with the recommendations of the Good Governance Code of Listed Companies of the Spanish National Securities Market Commission (CNMV).

Furthermore, with the entry into force of the Markets in Financial Instruments Directive II (MiFID II) and the Insurance Distribution Directive (IDD) in 2018, Banco Sabadell prioritises the provision of advice as the service delivery model for the distribution of financial instruments. The Institution has a tool called "*Sabadell Inversor*", which serves as a guide for relationship managers to recommend the products best suited to the characteristics and needs of customers, by analysing their experience, knowledge and preferences in relation to sustainability.

The information provided to customers, following the guidelines of those directives, is always impartial, clear and unambiguous. Furthermore, since March 2021, Banco Sabadell has been complying with obligations on sustainability disclosures in relation to products affected by Regulation (EU) 2019/2088, also known as the Sustainable Finance Disclosure Regulation (SFDR).

In accordance with its policies and procedures, the Bank has mechanisms in place to ensure that all information provided to customers is transparent and that all of the products and services which it offers are suited to their needs at all times.

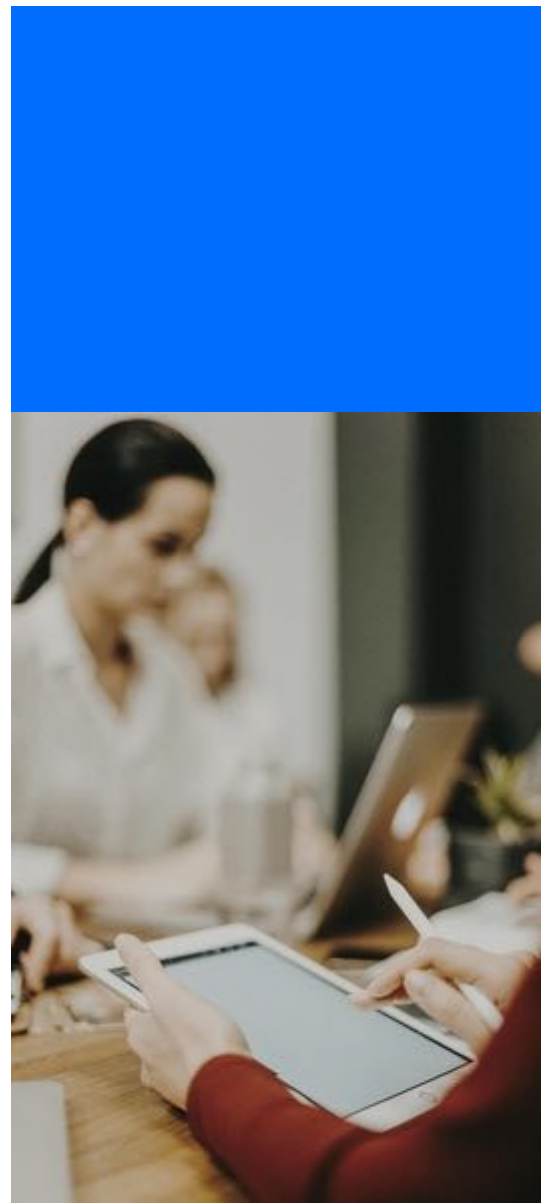
To this end, before marketing a new product or service, an internal workflow ("Product Workflow") is followed, where the relevant areas of the Bank review the various aspects to ensure they conform to the established standards. The subsequent validation by the areas involved is ultimately ratified by a high-level committee, the Technical Product Committee. This validation process allows the Institution to identify the target audience at which the product should be aimed, in other words, the group of customers whose interests, objectives and characteristics fit with the conditions of the product, and to identify products that are aligned with their preferences regarding sustainability, as established in MiFID II and the IDD.

Furthermore, every year, the various units responsible for the product offering perform an in-depth review of the conditions of the products and their impact on customers in order to ensure that those products remain suitable for the target audience defined originally. This review process falls within the obligations required by various customer and investor protection regulations, such as the Guidelines on Product Oversight and Governance Arrangements for Retail Banking Products and the MiFID II Directive. In the branch network, relationship managers have access to various items of information about products and services, which enable them to provide the necessary explanations so that customers and consumers may understand their characteristics and risks. This information is complemented with the corresponding pre-contractual information documents delivered to customers.

It should be mentioned that, since 2010, the Bank has been a member of Autocontrol (independent advertising self-regulatory organisation in Spain) and has followed its codes of conduct. In this way, it takes on the commitment of offering responsible advertising to ensure that its commercial communications meet the ethical standards applicable to the basic principles of advertising, authenticity and the need for veracity, to advertising forms and techniques, and to the protection of children, adolescents and health. It also takes on the commitment of ensuring that its commercial communications comply with the specific regulations of the Bank of Spain on the advertising of bank products and services and those of Spain's National Securities Market Commission regarding the advertising of investment products and services.

Furthermore, to mitigate the risk of over-indebtedness, it is important to note that for new applications received from retail customers, Banco Sabadell has a Credit Risk Granting Procedure and tools for automated analysis. These are designed to evaluate the ability of customers to fulfil their payment obligations. In addition, in order to protect customers and prevent their over-indebtedness, any possible situations that could arise from an increase in their expenditure are taken into consideration.

As for TSB, the UK subsidiary is committed to producing and publishing responsible advertising and promotional communications across the full range of propositions offered both as TSB and with its associated third-party suppliers. In this way, it meets the information needs of customers, ensuring that information is presented in a balanced, fair, clear and unambiguous way. TSB's Customer Communications and Product Promotion Policy is a reflection of the UK and, where appropriate, EU regulatory environment. The Policy is the remit of the Chief Marketing Officer, who takes responsibility for its rollout and supervision. The Chief Customer Officer is the executive owner of the



Policy. This Policy is published on the corporate intranet and is available to all employees.

The purpose of the Policy is to set out key processes, controls, and responsibilities enabling TSB to meet all relevant regulatory requirements, including in acting to deliver good outcomes when communicating to/with its customers, across all channels and customer communications, including financial promotions. TSB has no appetite for unfair customer outcomes and this Policy and its associated controls are designed to mitigate conduct risk and prevent the occurrence of customer harm arising from its communications or any other dealing they may have with TSB.

Banco Sabadell Mexico, for its part, in accordance with Mexican banking regulations, is transparent in its publication of product-related information. For this reason, the official website of Banco Sabadell Mexico, in the section on financial products, indicates the products that are offered and includes standard-form agreements currently in effect and product information sheets, which specify the terms, conditions, application requirements and fees of the various products.

The website also contains the costs and fees document, which sets out the costs, returns and fees of the products. The total annual rate of return (*Ganancia Anual Total*, GAT) on deposits is also shown, in accordance with the provisions of the Bank of Mexico.

3.2.3 Data protection

To ensure that personal data is processed pursuant to applicable data protection regulations, the Institution has a mechanism that comprises three lines of defence, through which all members of the organisation, from all areas, in line with their authority and discretions, actively take part in the management, control and supervision of the Institution's data processing activities.

Banco Sabadell has a Data Protection Officer (DPO) who has been duly entered in the register of the Spanish Data Protection Agency (Agencia Española de Protección de Datos, or AEPD), and who advises the different areas of the Bank in order to ensure compliance with regulations. Every year, the DPO reports to the Board of Directors, providing relevant information about the existing data protection risks.

Following the management model built around the three lines of defence, the Bank has the following action framework:

First line of defence	
Centralised Operations:	Unit responsible for designing and executing procedures concerning data subjects' rights in relation to data protection. Defines the procedure for obtaining consent as a legitimate basis for data processing and traceability.
Information Security Management:	Designs security measures commensurate with the risks associated with personal data processing. Performs impact assessments of personal data processing activities. Keeps a record of security breaches and defines criteria and protocols for notifying data subjects and, where applicable, the Supervisory Authority.
Data:	Enters all data processing activities declared by accountable units in the Data Processing Activities Log. Keeps information about international data transfers and their publication on the appropriate channel, where applicable, up to date.
Supplier Management:	Ensures that management units wishing to engage the services of a third-party supplier adequately identify the associated personal data processing requirements and coordinates and manages the adaptation of contracts to prevailing legislation.
Contract-Related Legal Advice:	Writes clauses related to data protection for both contracts entered into with suppliers and those entered into with customers and data subjects. Assesses the regulatory impacts on the organisation of potential sector-specific regulations.
Marketing/Product:	Ensures that commercial data processing activities take place based on suitable legitimate grounds. Seeks the consent of data subjects and determines legitimate interest.
Data controllers:	Lead the design and implementation of training and awareness-raising plans on the topic of data protection, requiring the involvement of each accountable unit.
Second line of defence	
Compliance:	Determines the controls needed to ensure compliance with data protection legislation.
Data Protection Officer (DPO):	Liaises with the Supervisory Authority and represents the Institution in various data protection forums. Determines the need to give notice and, where applicable, gives notice of a security breach. Deals with queries and complaints submitted by data subjects. Provides information and advice to the data controllers and their employees regarding the obligations established in data protection legislation. Defines the data protection policy. Advises and oversees the correct implementation of the data protection regulation.
Internal Control:	Receives information from Compliance regarding the effectiveness of the controls implemented by the first line of defence to mitigate compliance risks and any instances of non-compliance, together with the corrective measures taken, in order to carry out a joint assessment to be submitted to the corresponding governing bodies, and to align the controls with the established risk tolerance levels.
Third line of defence	
Internal Audit:	Supervises the activities of the first and second lines of defence. Reviews the control environment. Reviews the fulfilment and effectiveness of policies and procedures.

The aforementioned mechanisms are set out in Banco Sabadell's Personal Data Protection and Privacy Policy, designed by the Institution as an internal organisational instrument to ensure the protection of natural persons in connection with personal data processing.

This Policy is applicable to all personal data processing activities that take place in Banco de Sabadell, S.A., both automated and non-automated.

The Personal Data Protection and Privacy Policy is published on the Bank's work tool and is available to all employees; it is reviewed annually and approved by the Board of Directors. In addition, this Policy lays down the principles and arrangements in relation to personal data protection (Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016).

When implementing the management model indicated in the previous table, in 2025 the Internal Audit team, as part of its duties as the third line of defence, conducted an analysis of the governance, management and control of the risk stemming from personal data processing, concluding that, generally speaking, the current framework is adequate, although it did point out several aspects for which a series of improvements need to be made, on which work is currently underway and which include the correction of the Data Protection and Privacy Policy, specifically in relation to the annual approval of the Data Protection Oversight and Control Plan as well as the correct designation of the Chair and Secretary of the Privacy Committee, which meets on a quarterly basis.

All of the Bank's employees complete, as mandatory training, a course on personal data protection and, depending on the professional duties of each employee, they also receive specific training imparted by the Data Protection Officer (DPO). In addition, through the Bank's various communication channels, employees receive 'brief training capsules', written in a friendly and visually appealing way, which are used to convey short and direct messages to remind employees of their obligations in relation to data protection.

The Bank publishes information relating to its "privacy policy" and "privacy notice" on its website, in the section on customer information. This document, called "Annex of detailed information on personal data protection"⁷⁴, which contains mandatory information about the various personal data processing activities carried out by the Institution, is published in all of Spain's official languages and also in French, English and German. This document, which is available to anyone who may be interested and which is frequently updated, indicating the review date and the changes made with respect to the previous version, includes all new data processing activities launched by the Institution. The Personal Data Protection and Privacy Policy also applies to the engagement of third-party suppliers and the instructions that those suppliers receive are in line with the Bank's own Privacy Policy.

The Institution has a procedure for analysing and evaluating security incidents to determine whether an incident concerns personal data and should therefore be considered a security breach. These security breach assessments are carried out by the Data Protection Officer and are duly documented and made available to the Supervisory Authority. The assessments take place when the DPO is notified.

The findings of the security breach assessment may require the Supervisory Authority to be notified within 72 hours and may even require the data subjects themselves to be notified in cases where the rights and freedoms of the data subjects could be at risk. 28 security incidents were recorded in 2025, without it being necessary to inform either the Supervisory Authority or the data subjects.

On the other hand, disciplinary actions stemming from possible breaches are dealt with by the Labour Relations division, in accordance with the prevailing employment-related provisions (Workers' Statute, Collective Bargaining Agreement for Banks, and the Institution's internal regulations). These actions ensure that labour rights are upheld and that corrective and/or disciplinary measures are proportionally applied.

In the United Kingdom, TSB has a Data Privacy Policy that requires personal data to be processed correctly and lawfully and used only for

⁷⁴https://www.bancsabadell.com/cs/Satellite/SabAtl/Custom-information/GBS_Generico_FA/1183016790073/1191332198208/en//>
Other relevant information > Annex - Detailed information on personal data protection.

specific purposes. Where data is transferred to or processed by a third party, that data will be subject to a suitable due diligence process and transferred only for legitimate operational or commercial purposes. This Policy is published on the corporate intranet and is available to all employees. It has been approved by TSB's Executive Policy Owner.

The subsidiary has its own Data Protection Officer (DPO).

Responsibility for complying with the Data Privacy Policy lies with the first line's business areas and the heads of each business area take on the agreed responsibilities.

TSB carries out annual training dedicated to privacy and data protection, which all employees are required to complete on an annual basis. TSB's DPO reviews the content to verify that it addresses all the required topics before approving it.

In addition, there are several central controls that business areas are required to adopt. The Data Privacy Office tests the design and operational effectiveness of the controls on an annual basis. Reports are also submitted on a regular basis to risk committees and other governance forums.

As for Banco Sabadell Mexico, in accordance with Mexican personal data protection legislation, this subsidiary has and complies with a Personal Data Privacy Manual, to which all employees have access through a SharePoint community.

The aim of the manual is to establish and define policies and procedures in relation to personal data protection and privacy so that staff authorised to process personal data may engage in legitimate, controlled, informed and appropriate processing of the personal data of customers, users, suppliers and partners, whether through physical or electronic means.

This involves considering legal and regulatory factors, as established in the Law on Credit Institutions, in commercial legislation, recommended banking-related and commercial uses and practices, in local and federal civil legislation, and in the various secondary laws and standards governing the Institution, linked to its operation, obligations and responsibilities.

The executive division for Regulatory Control and Regulatory Management is the company's top level in charge of applying the manual.

There is also a process for upholding rights of access, rectification, objection and erasure/right to be forgotten. The aim of this process is to establish and provide regulatory and legislative guidelines so that the Bank may accommodate requests to exercise those rights and deal with any complaints or non-conformities in relation to its processing of customers' and users' personal data. The document is aimed at the Data Protection Officer and at those collaborating with the Bank that are subject to the procedure and whose functions require them to take certain actions in relation therewith. Together, they are responsible for dealing with requests to exercise the above rights, as well as any claims, complaints and non-conformities put forward by customers and users.



3.2.4 Cybersecurity

In 2025, the volume and sophistication of cyberthreats has continued to rise. The Institution has adjusted its controls, increasing its capabilities to prevent, detect and respond to major cyberthreats.

Banco Sabadell Group, in line with its internal security control framework, continuously monitors the cybersecurity risks to which it is exposed, in order to protect its information systems and corporate information, as well as information pertaining to customers, employees and other stakeholders.

This control framework, which is updated and expanded on a regular basis, includes the updated Information Systems Security Policy, the definition of cybersecurity responsibilities across the three lines of defence and in governing bodies, the control standards required to ensure the protection of information systems, and the continuous evaluation of the effectiveness of the cyberdefences. This control framework is aligned with the regulations applicable to the financial sector and with good cybersecurity practices, such as the NIST Cybersecurity Framework, the Digital Operational Resilience Act (DORA) and Standard ISO 27001.

The Information Security function, led by its corresponding Chief Information Security Officers (CISOs), sends semi-annual cybersecurity status reports to governing bodies, such as the Management Committee, the Board Strategy and Sustainability Committee and the Board of Directors, which are the bodies responsible for overseeing the Institution's cybersecurity, along with the Board Risk Committee, which oversees ICT risks. In addition, the Board of Directors is the body responsible for approving the Information Systems Security Policy.

This Policy applies at the Banco Sabadell Group level, so it includes information that covers the entire banking business perimeter, taking into account the Banco Sabadell brands that operate in Spain; TSB, which operates in the United Kingdom; and Banco Sabadell Mexico.

Banco Sabadell Group's in-house cybersecurity team is formed of over 100 specialist staff dedicated to ensuring that protection measures are appropriate to the existing cybersecurity risks. To that end, the following activities are carried out at least once a year:

- Analysis of new cyberthreats and their development, enhancement of controls, and risk assessments.
- Review and performance of ongoing checks on information systems and security controls, including certifications carried out by external auditors.
- Preparation for incidents, through training, drills and simulated cyberattacks.
- Training and awareness-raising campaigns for staff and partners, which include awareness-raising communications and regular drills. These communications include instructions that internal and external staff should follow to report potential security incidents, specifying the corresponding workflows to contact the cybersecurity team depending on the case at hand.
- Awareness-raising communications regarding cybersecurity risks and digital fraud for customers, which can be distributed by email, using digital channels or ATMs, or through social media campaigns.
- Annual training courses in relation to data protection and cybersecurity, which are mandatory for all employees, as well as specific training programmes for the cybersecurity teams.

Through the Information Security function, Banco Sabadell Group entities establish measures for the protection of information systems, which are set out in policies and procedures, to guarantee secure access to systems and to deal with new cyberthreats. These measures include:

- Role-based access control and regular recertification of these permissions.
- Robust authentication of remote access by employees and suppliers.
- Advanced malware protection systems.
- Systems for monitoring and correlating security events.
- Systems to collect and analyse cyber-intelligence data.
- Security incident response team, available 24 hours a day, 7 days a week, which is in contact with other Security Operations Centres (SOCs).

With these capabilities for protection, detection and response to cyberthreats, the Institution has not suffered any major cybersecurity incidents in 2025, adequately mitigating any cyber-related incidents affecting suppliers.

Banco Sabadell Group engages third-party specialists to run advanced cybersecurity tests, which evaluate the effectiveness of its key controls by simulating realistic cyberattacks. These verifications, which consider commonly used cyberattack techniques, prepare and train teams responsible for cyber defence, thus improving the levels of protection.

These tests also use well-renowned automated verification tools that simulate multiple cyberattacks. The Group's various entities also pay attention to the main external ratings that measure cybersecurity (Bitsight, RiskRecon, Security Scorecard). Banco Sabadell Group has secured positions in the top spots of these ratings in comparative terms with the rest of Spain's banking industry.

The various Banco Sabadell Group entities also endeavour to ensure the resilience of their infrastructures, making sure they have redundant components and regularly tested recovery procedures in order to guarantee the continuity of technological services in the event an incident occurs, such as a disaster affecting the facilities or a cyberattack.

In addition, every quarter, Banco Sabadell Group carries out drills that simulate cyber incidents, training the Institution's teams to detect and contain cybersecurity events and to recover operating services to minimise potential impacts.

Its financial statements are also subject to annual statutory audits and an external audit takes place, focusing on the design, implementation and operational effectiveness of its cybersecurity controls, carried out following the main information security standards. Internal audits are also scheduled and carried out to ensure the continuous improvement of, and compliance with, the established controls.

In addition, Banco Sabadell Group's cybersecurity specialists participate in digital transformation initiatives and technological projects, assisting with the assessment of security risks, defining the security controls and measures to be incorporated and carrying out technical security tests to check that no vulnerabilities are introduced.

Among the digital transformation initiatives designed and rolled out securely with the participation of the cybersecurity team, it is worth highlighting new financial products and services, such as those detailed in the "Digital transformation and customer experience" section of the consolidated Directors' Report.

3.2.5 Financial inclusion and access to products and services

3.2.5.1 Vulnerable customers

The Bank is monitoring the evolution of its vulnerable customers on a State-wide basis mainly in three areas: financial, digital and regional vulnerability.

The Bank is currently monitoring the evolution of its vulnerable customers on a State-wide basis (understood as customers who, due to personal, economic, educational or social needs or circumstances, are in a situation of special dependency, defencelessness or lack of protection that prevents them from exercising their rights on an equal footing), mainly in three areas: financial, digital and regional vulnerability.

Financial vulnerability:

The first area is financial vulnerability, i.e. low-income customers. During 2025, the Institution has continued with its identification of financially vulnerable customers to ensure they are managed appropriately, and it has also maintained its protection measures in relation to borrowing, to ease customers' financial burden and prevent over-indebtedness.

The Institution has continued to impart training to teams specialising in debt recovery to enable them to offer customers the option to request application of the Code of Good Practice, given the impact of the new mortgage code and the new amendments made in light of the urgent measures put in place for those affected by the DANA flash floods.

Digital vulnerability and regional vulnerability:

The second area is digital vulnerability, i.e. customers who experience difficulties accessing and using online/digital banking services or who have difficulty using ATMs.

The third area relates to customers with regional vulnerability, i.e. customers located far away from the Institution's infrastructures and who have difficulties in accessing cash.

In these two areas, the following actions taken during 2025 are worth mentioning:

- Banco Sabadell has five mobile branch vehicles operating on different routes, three of them in Asturias, one in Galicia and one new route in the province of Leon (since September 2023). The routes in Asturias serve customers in 17 different towns, while those in Galicia and Leon cover 5 and 4 locations, respectively.
- The Correos Cash service represents a strategic innovation in the service delivery model. Following its implementation in Banco Sabadell at the end of 2024 and its consolidation throughout 2025, the Bank's customers can withdraw cash from any Correos office or through its network of rural postal operatives, thereby giving them easier access to cash and improving financial inclusion across the territory.

Also in 2025, progress continued to be made on the development and evolution of protocols such as the strategic protocol to strengthen the banking sector's commitment to society and sustainability (Protocolo Estratégico para Reforzar el Compromiso Social y Sostenible de la Banca), in relation to measures to foster financial inclusion. Follow-up reports on the aforesaid protocol were also published and meetings took place between the banking industry and the Ministry of Economy to assess the level of implementation of the protocol and explore possible improvements.

Accessibility

Commitment to accessibility and inclusion

Our way of interacting with customers is based on proximity, specialisation and continuous improvement. That is why we continue to work to offer them the best possible care, with the commitment to build a

more accessible and inclusive bank. This commitment entails assuring that products and services are accessible to all, particularly those with some form of disability, and ensuring that the way in which we communicate is straightforward and clear, so as to come closer to meeting the needs of all of our customers. This is reflected in different areas of our activity:

Digital channels and telephone helplines

We are starting to implement a universal design for our digital services (business website and mobile app), following the Web Content Accessibility Guidelines (WCAG 2.2, level AA). We are working to improve usability and the navigation experience by collaborating with renowned specialists. The Bank remains determined to improve accessibility so as to remove obstacles in its digital channels. For any queries or issues when using digital channels, the Bank has set up a free telephone helpline exclusively for accessibility aspects. In addition, it has set up a video-call service with Spanish sign-language interpreters (ILSE) operating both remotely and in branches.

Branches and offices

In terms of our brick-and-mortar locations, we have adapted our branches and offices, observing the established timeframes and the measures stipulated in the new regulations. The available services have been expanded to ensure suitable circulation routes and to provide an adapted customer service model, for example, offering the option to request documentation in Braille or to book a video-call appointment in which a sign-language interpreter can be present. With a view to enhancing customer service and experience, a specific training initiative was introduced for branch staff. This training course is provided by a partner specialising in accessibility, with the aim of offering a more inclusive and higher quality service.

Products and services

In relation to payment services, major improvements have been made with accessibility in mind. In the case of cards, all newly issued cards come with a notch to allow them to be identified by touch. Customers with visual impairment can also request cards in Braille format. In the case of ATMs, the current fleet is being upgraded to introduce accessibility elements. This includes the renewal of obsolete ATMs so that they meet assistive hardware criteria, with measures such as the adjustment of their height in the case of newly installed machines, as well as software updates, paying particular attention to their usability by different groups of people. In point-of-sale devices, their software has been adapted, focusing on their main features, such as usability and operability, following the best practices of the market, and progress continues to be made to introduce new accessibility functions to make the payment services used by businesses and merchants more inclusive.

3.2.5.2 Sogeviso

In Spain, Banco Sabadell manages social housing through Sogeviso (a wholly-owned subsidiary created by the Bank in 2015) in order to responsibly tackle the social exclusion of its vulnerable mortgage customers and the loss of their primary residence.

In its ten years of activity, Sogeviso has managed around 23,000 contracts for social or affordable rent and it has helped some 8,500 families improve their social and economic situation through its programmes designed to offer social support and improve employment prospects (JoBS). Of these 8,500 participants of the social support programme, 4,929 families improved their social and economic situation.

As at 31 December 2025, Sogeviso managed 1,953 properties under social and affordable rent arrangements specifically aimed at these vulnerable customers. In 10% of these cases the Social Contract remained in place.

Rental contracts are arranged for the length of time (term) indicated in the urban letting act (*Ley de Arrendamientos Urbanos*, or LAU) at the time they are signed (3, 5 or 7 years). In some cases, it is possible that some contracts may have been signed for terms longer than those stipulated by the LAU at the time. Contracts are renewed for the same term for which the original contract was signed. Lastly, depending on the specifics of the case, it is also possible to opt for an automatic one-year extension.

In relation to the Social Contract (support programme), this has a maximum duration of 36 months, which can be extended by a further 6 months in very exceptional circumstances.

The Social Contract is an innovative model for managing vulnerable customers. It is a service for customers with a means-tested social rental arrangement that offers specific support provided by a social manager based on three independent lines of approach: connect these customers with public services, offer them training on personal finances, and facilitate access to public aid and the JoBS programme.

The JoBS programme is a job placement service that aims to provide customers with skills and tools to enable them to access the labour market, as well as market research to match profiles with existing job offers. Since the launch of the Social Contract in 2016, a total of 2,410 people have found work thanks to the JoBS programme.

As at the end of December 2025, the Social Contract has helped 193 families, and 13 people have been actively searching for employment through JoBS.

In addition, Banco Sabadell has assigned 79 properties to 37 non-profit institutions and/or foundations, aimed at supporting the most disadvantaged social groups, and since 2013 it has been a member of the Social Housing Fund (*Fondo Social de la Vivienda*, or FSV), contributing 416 homes intended mainly for customers and acquired through deeds in lieu and reposessions. Of the FSV housing stock, 96% is let out under social rental agreements currently in effect.

Furthermore, as per the General Data Protection Regulation, the documents signed by tenants and members of the family unit upon opting in to the Social Support programme and JoBS, respectively, specify the channels through which they may exercise their rights in relation to their personal data and indicate where they should send any queries or concerns that they may have in relation therewith.

23,000

Contracts for social or affordable rent

8,500

Families

In addition to the telephony and email channels, the vulnerable families helped by Sogeviso may contact the company through service providers engaged by Sogeviso to manage social contracts and JoBS. They can also contact the company by telephone or email, as well as in person by requesting onsite visits to the properties that they occupy.

The channels are subject to the General Data Protection Regulation.

In the same way, there are alerts that are triggered if any personal data is sent via email. If an alert of this kind is triggered, Sogeviso's Corporate Services division contacts the person/unit that triggered the alert in order to ascertain the reason behind the event and to find solutions for the secure sending of data where necessary. Information is sent to Operational Risk on a monthly basis regarding the monitoring of incidents related to any outgoing personal data.

All suppliers and service providers act legitimately through contracts with Sogeviso, with clauses on personal data processing worded by Banco Sabadell's Contracts division.

Every year, personal data processing activities and the associated DPIAs are reviewed.

The relevant unit monitors suppliers and service providers to ensure they receive consent to personal data processing by the various business lines.

In the case of the data processing itself, it ensures that customers are aware of the channels they can use to exercise their rights, as these are set out in writing in the documents that they sign. On the other hand, in relation to the telephony channel, all outgoing calls to customers with a social or affordable rent agreement are recorded for quality purposes, and they are assessed on a quarterly basis, based on a random sample, keeping a record of the assessment results based on various parameters.

Sogeviso's management processes ensure not only compliance with regulations concerning vulnerable customers, both State-wide and specific to autonomous communities, but also fulfilment of the Institution's social responsibilities. Thus, all processes envisage the collection of information and documentation to verify the social and economic situation of the family unit, as well as individual decision-making, for each situation.

In addition, tenants or mortgage debtors whose properties have been repossessed by the Bank may contact Sogeviso to manage and search for solutions to their situation (such as, for example, the inability to keep up with rent payments due to a reduced level of income).

3.2.5.3 Code of Good Practice

Banco Sabadell adheres to the Code of Good Practice (*Código de Buenas Prácticas*, or CBP) enacted by Royal Decree Law (RDL) 6/2012⁷⁵ of 9 March and to its subsequent modifications, the latest of which was introduced by RDL 19/2022⁷⁶, extended by the Council of Ministers Agreement of 22 November 2022, whose main objective is to arrange for the viable restructuring of mortgage debt for primary residences, which is aimed both at families struggling to keep up with their mortgage payments because they are on the 'exclusion threshold' and at persons in vulnerable situations. On 16 December 2022, Banco Sabadell also voluntarily signed up to the new Code of Good Practice introduced by Royal Decree Law 19/2022, amended by a Council of Ministers Agreement dated 27 December 2023 and by Royal Decree-Law 7/2024 of 11 November 2024. As at the end of December 2025, it had arranged 140 debt restructuring transactions under the two aforesaid codes.

Customers in Spain are made aware that the Bank follows the CBP, either by their branch manager or through the landing page of the Bank's website, which explains what this debt restructuring plan consists of and the necessary requirements to request its application. In addition, all of the communications sent to customers who hold a mortgage on their usual residence and who are experiencing payment difficulties contain information about the service.

Interaction with customers always takes place through an external agency, regardless of the way in which the customer has expressed interest in benefiting from the CBP. Within 24 hours following the customer's call or application, they are contacted in order to request the relevant documents needed to analyse the operation.

The actions taken by the agency are governed by an action protocol put together by the CBP department in accordance with the procedure and timeframes established in regulations.

The process for dealing with applications for the CBP has control mechanisms to ensure that it takes place in accordance with the corresponding action protocols and regulations. Specifically, the various departments taking part in the application process undergo regular checks and controls.

Those controls include verifying that the process is completed and communicated within the timeframes laid down by regulations and that each case is analysed correctly (calculation of affordability, economic data about the family unit, etc.) and that the letters sent to inform customers of the outcome of the analysis are in line with that established.

They also include verifying that the formalisation phase has been conducted correctly, from the moment the application process for a notary's signature begins until the signature is added to the system. This monitoring exercise takes place on a weekly basis and a comprehensive verification exercise is carried out on the various departments involved, to ensure that the application of the measures is not delayed once the customer has been informed that they are eligible to benefit from the debt restructuring plan provided by the CBP.

Banco Sabadell's processes ensure that customers are offered the possibility of applying to benefit from the CBP and that their applications are processed in line with prevailing regulations. Customers are also offered help to put together the necessary documents, if necessary. All applications are analysed on a case-by-case basis, being particularly mindful of the specific circumstances of each case.

140

**Debt restructuring
transactions**

⁷⁵ There is no fixed time limit; it will remain in force for as long as the Institution continues to adhere to it.

⁷⁶ The time limit is until 31 December 2025, with the exception of those affected by the DANA flash floods, in which case the time limit is until the end of May 2026.

3.2.5.4 Social and volunteering activities

Banco Sabadell Group articulates its commitment to society mainly through the Banco Sabadell Private Foundation (hereinafter, Banco Sabadell Foundation) with a view to driving forward the progress and social welfare of individuals, by promoting culture and the arts, as well as research and education, with particular interest in fostering young talent.

In 2025, the Banco Sabadell Foundation received an endowment of 5.42 million euros from Banco Sabadell, earmarked for implementation of the annual Action Plan, of which 4,231,819 euros had been allocated as at the end of the year for collaborations with other institutions.

Under the 2025 action plan for Banco Sabadell's Commitment to Sustainability, specifically under the pillar entitled "Work together for a sustainable and cohesive society", the Group undertook to promote culture and talent, fostering education and research through the Banco Sabadell Foundation. In this context, the Banco Sabadell Foundation has achieved its established objectives: firstly, the number of people benefiting from talent programmes has exceeded 74,600, far more than the predicted 57,000. Secondly, the endowment put towards these collaborations in 2025, as indicated, was 5.42 million euros, 20.64% more than in 2021, exceeding the target set out in the plan to increase this sum by 18%.

These results reinforce the commitment of the Banco Sabadell Foundation, and of the Group, to fostering creativity, innovation and excellence as pillars from which to build a more inclusive, dynamic and cohesive society, cementing the commitment to educational, scientific and cultural development.

To monitor the institutions and projects with which it collaborates, a supporting document is requested both at the start and at the end of the collaboration, in order to verify that the funds have been correctly allocated and that the activity has taken place as agreed. Both at the start and at the end of the activity, the projects are evaluated based on indicators that make it possible to measure the suitability of the project, analysing the medium- and long-term results, to decide whether to continue to support it. In addition, an evaluation matrix has been developed that very few third-sector entities have, which makes it possible to be completely objective and transparent when distributing resources, allocating them efficiently according to the needs of each entity and project.

The Banco Sabadell Foundation categorises its activity into two main action areas: "Research and education", and "Culture and the arts".

Research and education

By supporting research and education, the Banco Sabadell Foundation invests in society's future and in its ability to find solutions to the most complex and urgent challenges, contributes to boosting the economic, social and cultural growth of the nation, by increasing productivity and innovation, creates learning opportunities, and fosters people's talent to make it easier for them to access the job market.

Culture and the arts

By promoting culture and the arts, the Banco Sabadell Foundation fosters creativity and innovation, provides opportunities and resources to young artists to help them develop their skills, and advocates for a more equitable and diverse society. In addition, it contributes to the cultural enrichment of society and turbocharges transformation.



Promotion of alliances

The Banco Sabadell Foundation promotes the creation of alliances between institutions that seek to raise the profile of culture, the arts, research and education in order to build avenues for collaboration and a more critical, fair and inclusive society. It supports the institutions with which it collaborates by providing its knowledge and networks, and by boosting synergies between institutions and projects to facilitate collaboration.

The Banco Sabadell Foundation supports trailblazing cultural schemes organised by some of our country's top institutions, such as the Círculo de Bellas Artes cultural centre, the Teatro de la Maestranza

theatre, the Fundació del Gran Teatre del Liceu theatre foundation, the Palau de la Música concert hall, the Museu d'Art Contemporani de Barcelona (MACBA) art museum, the Fundació Òpera Catalunya opera foundation, the Fundación Amigos del Museo del Prado museum foundation, the Fundación Museo Guggenheim museum foundation, the Institut Valencià d'Art Modern (IVAM) modern art institute, the Fundación Centro Cultural Internacional Oscar Niemeyer cultural foundation, and the Fundación José Ortega y Gasset – Gregorio Marañón foundation, among others.

In addition, in 2025, the Banco Sabadell Foundation put together a Steering Group formed of directors of leading entities of our country's cultural sector to use social innovation methodologies to reflect on the challenges and opportunities of the cultural industry. This work is complemented with the opinions collected at previous meetings from other contrast groups formed of entities with which the Banco Sabadell Foundation collaborates across the country, as well as prominent young creators. This work also revealed the need to strengthen the leadership of the cultural sector, and a programme was devised and created to that end, which will be unveiled in 2026.

Commitment to young talent

The Banco Sabadell Foundation demonstrates its commitment to young talent by supporting leading universities, research centres and educational institutions, as well as by contributing to research excellence through awards, residencies and support programmes.

The most noteworthy activities in this area are:

- Its own awards, such as the twentieth edition of the Biomedical Research Award, the nineteenth edition of the Economic Research Award, the ninth edition of the Science and Engineering Award, and the fourth edition of the Marine Sustainability Award.
- Awards to recognise young talent, such as the ANFACO Design Award, the Joan Guinjoan International Award for Young Composers of the Escola Superior de Música de Catalunya (ESMUC) school of music, the Maria Canals International Music Competition for piano performers, the International Award for Young Cellists of the Fundació Pau Casals foundation, and the Mirna Lacambra Competition for the professional training of young opera singers.
- Collaborations with leading universities and academic centres with awards and bursaries to promote young talent and employability at the University of Leon (Ralbar bursaries), the University of Alicante and the Miguel Hernández University (internship programme), the University of Deusto (Project 3R), the University of Oviedo (Hackathon TalentUO, organised by the Asociación TFCoop association), the University of Vigo (Foro Fundamental of the Fundación Mentor foundation), the University of San Jorge (research grants), the Jaume I University (Estudia e Investiga programme), the University of Las Palmas de Gran Canaria (advanced university course on digital skills), the bursaries offered by Escuela de Empresarios de la Comunidad Valenciana (EDEM), ESADE and the Barcelona Education in Science and Technology (BEST) Foundation, and the doctorate programme in artificial intelligence of the ELLIS Alicante Unit.
- Programmes of bursaries, courses and residencies in art centres, such as the bursaries offered by the Fundació Comunitat Valenciana - Auditorium of the Provincial Council of Alicante (ADDA) foundation,

by the Reina Sofia School of Music and by the Conservatori del Liceu; the summer course offered by the Museo Nacional del Prado museum; the contemporary dance residencies of the Consorci Mercat de les Flors; the European early music programme EEEmerging, hosted by Joventuts Musicals de Torroella; the Bivac Festival organised by the Centre de Cultura Contemporània de Barcelona cultural centre; and the call for applications for the *Ayudas a la Creación* bursaries offered by the Fundación Antonio Gala foundation.

- Training programmes for emerging artists with the Teatro Real theatre (Crescendo and Ciclo Jóvenes Talentos), the Fundació Miró foundation (Espai 13), La Casa Encendida (Generaciones), the Fundación Cidade da Cultura de Galicia foundation (Encontro Artistas Novos), the Associació Franz Schubert association (Lied the Future), the Garnati Orchestra (Asociación Aulós association), the Consorci de l'Auditori i l'Orquestra consortium (Festival Emergents and Sampler Series cycle), the Gran Teatre del Liceu theatre (Oh! pera programme), the Fundació Ópera Catalunya foundation (Escuela de ópera and Jove Orquestra Simfònica del Vallès), and the Talent Lab programme for young film-makers offered as part of the Atlántida Mallorca Film Fest.
- The young talent training programme offered by the Asociación Celeria association (Academias de Potencial), the awards and grants of the Talent Global programme for CIDOB, the seminars organised by the ASPEN Foundation and the Lab Thyssen programme organised by the Fundación Museo Thyssen-Bornemisza foundation.

Culture as a tool for social transformation

The Banco Sabadell Foundation's mission is to bring culture closer to society by co-promoting, together with flagship cultural centres, transformative proposals that contribute to the training, development, readiness and employability of young people through various artistic disciplines:

- Educational and professional guidance projects aimed at young people in socially vulnerable situations, organised by the Exit Foundation (Coach programme), the *Fundación Empieza por Educar* foundation (*Sabadell EduTalent*), as well as teacher training with the Fundació *La Ciutat Invisible* foundation (*Seminario Docentes seminars*) and the *Fundació Princesa* de Girona foundation (*Generación Docentes* programme).
- Projects for cultural transformation through the arts, organised by Madrid Destino (Dentro Cine), the Fundació *La Ciutat Invisible* foundation (*A Tempo*), Teatro Joven (*Entrenamientos creativos*), and L'Arc Taller de Música (*Zona Jove Xamfrà*)
- Social inclusion projects put together by the SHIP2B (B-Value) Foundation, the Fundación Grupo SIFU foundation (*SuperArte* bursaries), the Reina Sofia School of Music (*Entrepreneurship* programme), the Fundación Dáboris foundation (bursaries for promising youths at risk of social exclusion), the Fundación María José Jove foundation (*Arte y Salud* programme), the Supercapacidades project (co-created by Fundación Grupo SIFU, ESMUC, and the Maria Canals International Music Competition), and the Ànima Lliure programme held by the Teatre Lliure theatre for people with functional disabilities.
- Programmes that bring culture to rural areas, such as the initiatives organised by the Fundación Valdés-Salas foundation; several music festivals, such as the Schubertiada at Valdegovía (*Associació Franz Schubert* association), Festival Bal y Gay in the region of A Mariña Lucense, Festival Atrio in Cáceres, Festival Jordi Savall in

Tarragona, Raimat Arts Festival in Lleida, Festival Espurnes Barroques in central Catalonia, the Quincena Musical musical fortnight in the Basque Country, Ciclo Las Piedras Cantan organised by the Fundación Santa María La Real foundation in Palencia; and community mediation schemes such as the art intervention in the Baiona pier (Baiona Town Hall).

Medical research and health

In addition to the Banco Sabadell Foundation's four awards for Biomedical Research, Economic Research, Science and Engineering, and Marine Sustainability, the Banco Sabadell Foundation also supports scientific research through programmes organised by leading entities in the sector, forming part of the Board of Trustees of the Barcelona Institute of Science and Technology (BIST) and supporting its BIST Catalyzers programme designed to promote entrepreneurship and innovative thinking within the BIST community, supporting the *Programa de Intensificación de Investigadores* intensive research programme organised by Consorci Parc Taulí, the programme of alumni research grants of the San Jorge University, the pre-PhD grant offered by the Fundación para la Investigación e Innovación Biosanitaria del Principado de Asturias (FINBA) foundation, and the annual activities of the Fundació Pasqual Maragall foundation and the Degén Institute of the Fundación Española de Ayuda a la Investigación en Parkinson (Spanish foundation for research into Parkinson's disease), the Caring for Smiles, Changing Lives programme organised by the Universitat Internacional de Catalunya (UIC) university, and also supporting the multi-purpose cardiovascular intervention room of the Fundació Althaia foundation.

Financial education

Banco Sabadell continues to promote and take part in a number of financial education initiatives. By engaging in this type of activity, the Institution aims not only to meet the training requirements of society in general, but also to be by their side to help them develop skills and decision-making abilities. Some of the initiatives undertaken include:

- The *Educación Financiera en las Escuelas de Cataluña* (EFEC) programme for financial education in schools: Banco Sabadell continues to participate in this programme, having done so for twelve consecutive years and ever since its inception. Thanks to the corporate volunteers of the participating institutions, a total of 239,810 students have received training in basic finance. In this edition, which continued to take place in hybrid format combining face-to-face and virtual workshops, the programme has been taught in 505 educational centres. With the participation of 86 volunteers who ran a total of 714 workshops, Banco Sabadell, together with all of the collaborating institutions, provided training for 25,917 young people aged 15-16. In terms of its version for adults, 24 of the Bank's volunteers held 84 workshops in adult schools and correctional facilities.
- 'Your finances, Your future' (*Tus Finanzas, Tu futuro*) initiative promoted by the Spanish Banking Association (Asociación Española de Banca, or AEB) and the Junior Achievement (JA) Foundation. In this year's online edition, 103 volunteers from the Bank took part in 58 programmes delivered to 46 educational centres and 1,281 students. In 2025, the programme, which is nationwide in scope, was delivered to 192 centres and 2,147 students.
- 'What do we know about economics' (*Qué sabemos de economía*) programme, organised by the Colegio de Economistas de Asturias school of economists and the Oviedo City Council to teach basic concepts about economics and financial education to students aged

239,810

Students trained in basic finance

11-12. 11 volunteers from Banco Sabadell took part, holding a total of 22 workshops that benefitted 822 students.

- The ONCE Foundation, in partnership with the AEB, promotes financial inclusion through the 'Inclusive Finance' (*Finanzas Inclusivas*) project, designed to offer financial education training to people with intellectual disabilities and learning difficulties. The aim is to give them more autonomy and improve their opportunities for social inclusion and employability, offering them essential tools to manage their money and savings. 16 volunteers from Banco Sabadell took part in the first edition of this project, contributing to the training of 363 beneficiaries.

During 2025, a total of 9,581 people took part in the workshops led by Banco Sabadell volunteers as part of these programmes.

9,581

Annual recipients of financial education programmes

Business support and training

- 'Export to Grow' (*Exportar para crecer*) programme: as part of its commitment to provide training in internationalisation to small and medium-sized enterprises, Banco Sabadell, in collaboration with AENOR, AMEC, Arola, CESCE, Cofides, ESADE and Garrigues, has been promoting the 'Export to Grow' programme since 2012. This programme supports SMEs in their internationalisation process, through online tools, specialised information services and the organisation of roundtables throughout the country. Under this programme, international business events (*Jornadas de Negocio Internacional*) have taken place in both online and hybrid (in-person + online) format, including one on the impact of the geopolitical landscape on Spain's exports sector, attended by members from around 1,600 companies, and a special series of talks on the United States, with 500 companies taking part.
- Sabadell International Business Program: the Institution held the eighth edition of this university-certified training programme on the provision of advice for business customers, which has already attracted the participation of some 700 companies engaging in international business.
- Financial Advisor Course for Religious and Third-Sector Institutions: organised in partnership with the post-graduate school of the Universidad Francisco de Vitoria university, this course aims to provide a solid foundation for the day-to-day tasks of officers and trustees. This university certification offers complete and rigorous training to professionals and collaborators in the sector, with the aim of reinforcing the specialised knowledge of these institutions and helping to provide their officers with knowledge and tools. This training is open to professionals from all sectors and offers a range of scholarships covering up to 80% of the enrolment fee. This edition ended with a total of 97 enrolled students (22 of them Banco Sabadell employees).

Bridging the digital divide

In 2025, Banco Sabadell promoted the following programmes and initiatives, upholding its commitment to education and digitalisation:

- The 'Technological autonomy and digitalisation' (*Autonomía tecnológica y digitalización*) programme, to bridge the digital divide between older people, in collaboration with the Fundación Vivo Fácil foundation, an organisation specialised in improving the quality of life of older people and other vulnerable groups. The aim of its training activities is to provide those taking part with information about and access to the possibilities that ICT has to offer, improving not only

their autonomy and quality of life but also their sense of connection and companionship.

In 2025, 36 four-hour workshops were organised, with an average of 12 people in attendance. The workshops were taught by a specialised technician from Fundación Vivo Fácil and a volunteer from Banco Sabadell. 64 volunteers took part and this programme reached a total of 1,728 individuals.

The Banco Sabadell Foundation carried out the following programmes:

- The university expert course on digital skills of the Fundación Universitaria Las Palmas (FULP) university foundation, which seeks to prepare recent graduates of further education for a digitalised and ever-changing job market.

Corporate Volunteering Programme

This year, once again, the people who form part of Banco Sabadell demonstrated their commitment to society, going above and beyond their professional duties, devoting their time and expertise to help people and organisations in need of them. More than 3,100 volunteers took part in social initiatives promoted by the Bank, its Foundation and other collaborating organisations, through the Bank's Corporate Volunteering Programme.

3,100

Volunteers

In addition to the educational programmes indicated above, the cooperation initiatives and charitable programmes carried out by the Bank include, most notably:

- Support for third-sector institutions that participate in the B-Value social innovation programme, the aim of which is to professionalise the value proposition and to work on the sustainability of projects of non-profit social institutions throughout Spain. Since the first edition of B-Value in 2017, the Banco Sabadell Foundation and other organisations that promote the programme have given out different awards to finalists from among the 40 participating entities. These awards help them to take their projects forward and give visibility to the causes that they support, putting the spotlight on talent and innovation. One of the keys to the programme's success is the participation of the Bank's employees as volunteer mentors. This year, 40 employees from different areas of the Bank and in pre-managerial roles and 10 employees from Sabadell Zurich supported these organisations in developing their social impact projects.
- With regard to programmes that leverage the knowledge and experience of the Bank's employees and that concern vulnerable sectors of society and/or those at risk of social exclusion, it is worth mentioning the Leader Coach Project and the Career Guidance Programme aimed at socially vulnerable young people run by the Exit Foundation, in which the Banco Sabadell Foundation is involved. It is a corporate volunteering initiative that seeks to improve the future employability of young people who have had an unsuccessful academic experience. This year, 14 volunteers from the Bank took part and dedicated 206 hours of their time to 14 young people, to keep them in training.
- In line with the goal of promoting and supporting young talent, the mentoring and talent management programme provided by the University of Alicante and Banco Sabadell's tech skills centre in Alicante (*Centro de Competencias Tecnológicas de Alicante*, or CCTA) is worthy of mention. In 2025, the fifth edition of the programme was held, in which 32 professionals from the CCTA guided students from the University of Alicante through the resolution of a challenge, so that they could develop key skills for their professional future.

- Women also benefit from the following programmes: 'Ace your job interview' (*Triunfa en tu entrevista de trabajo*), 'Job search 2.0' (*Búsqueda de empleo 2.0*), 'Ready and able' (*Capaces*) and 'Emotional intelligence for the workplace' (*Inteligencia emocional para el empleo*), in which the Bank has been collaborating with the Fundación Quiero Trabajo foundation since 2019. The aim is to empower people, particularly women at risk of social exclusion, by enhancing their aptitudes and attitudes, and by giving them the tools to successfully navigate the selection process and job interviews. This year, a total of 102 volunteers from the Bank mentored the participants of these programmes. In 2025, in collaboration with Fundación Quiero Trabajo, the Bank accompanied other vulnerable groups, such as young inmates at the Quatre Camins prison, members of the LGBTIQ+ community and people with intellectual disabilities.
- Each year, to coincide with the Christmas festivities and in collaboration with Fundación Magone - Salesianos Acción Social, through its corporate volunteering programme, the Bank runs the 'Be one of the Wise Men' (*Conviértete en Rey Mago*) programme, in which volunteers deliver gifts in response to letters written by children under the care of the foundation. On the eve of Epiphany, the volunteers distribute the gifts. In 2025, 586 volunteers from Banco Sabadell took part in this project. In addition, in collaboration with Cáritas Molina de Segura, 75 volunteers distributed the same number of gifts to children in the local community.





4. Governance information

4.1 Business conduct

4.1.1 Code of Conduct

One of the fundamental elements for consolidating a robust corporate culture is the existence of a set of regulations that reflects the firm commitment of all units to comply with legislation, starting with the Management Body.

In this regard, the policies in place at the Bank for managing business conduct matters are indicated here below. In addition, both the Code of Conduct and the policies are published on the Bank's corporate website and on the corporate intranet available to all employees.

Banco Sabadell Group Code of Conduct

The Board of Directors approved Banco Sabadell Group's Code of Conduct in order to set out the catalogue of principles, obligations and duties that should govern the actions of all those within the Group. The Code of Conduct is reviewed regularly and updated as required.

All internal obligations with ethical content are included in the Group's Code of Conduct, which thus groups them all together in a single regulatory compendium under the direct supervision and approval of the Corporate Ethics Committee and the Board of Directors.

The aim of the Code is to define the criteria that should be followed for ethical and responsible behaviour, both in relationships within the Group itself and in those entered into with customers, suppliers, shareholders, investors and other stakeholders.

Those subject to the Code are people who form part of governing bodies, people with employment links, external suppliers and business partners. It is applicable in all jurisdictions and territories in which the Group carries out its activities, so they are required to formally adopt it.

The principles that underpin the corporate culture and serve as a framework of reference for the Code are the will to serve, proximity, adaptability, commercial approach, innovation, professionalism, ethical conduct, sustainability, austerity, prudence, teamwork, compliance with prevailing legislation and any internally established regulations that may be applicable, transparency, and respect for the privacy and intimacy of the various data subjects whose personal data is subject to processing.

All staff must formally declare their commitment to the Code through a personal and tailored adoption process. They are given an initial deadline to complete this task, which is monitored on a weekly basis.

Banco Sabadell Group Corporate Crime Prevention Policy

The purpose of Banco Sabadell Group's Corporate Crime Prevention Policy is to establish the applicable principles, critical management parameters, governance structure, roles and responsibilities, procedures, tools and controls relating to the prevention of corporate crime, and to ratify the firm commitment of the Group to abide by those rules as well as ethical standards and, in particular, its resolve to implement rules and controls to minimise the commission of crimes and to confirm the complete and absolute intolerance of any inappropriate behaviour and, especially, any conduct that may constitute a criminal offence. All this forms the Corporate Crime Risk and Anti-Corruption Management and Organisation Model. Ultimate responsibility for it lies with the Board of Directors, while the CEC is responsible for overseeing the functioning, observance and execution of that model, in accordance with the stipulations of the Policy.

The unit responsible for the Group Policy is the Compliance division, which also takes responsibility for defining general guidelines relating to the prevention of corporate crime and for supervising their appropriate implementation.

The Policy is applicable to the activity carried out by Banco Sabadell Group through its companies in the various territories in which it operates.

Its subjective scope of application extends to the Group's directors, legal representatives and employees and to all natural or legal persons providing services to or in the Group, as well as all collaborating partners, professionals or firms subcontracted by the same.

In 2022, AENOR Internacional S.A.U. conducted a full audit of the Corporate Crime Risk and Anti-Corruption Management and Organisation Model, with a view to ascertaining and certifying that Banco de Sabadell S.A.'s model complied with the requirements set forth by standards UNE 19601 on crime compliance management systems and ISO 37001 on anti-bribery management systems, obtaining both certifications in early 2023 and retaining them in 2024 and in 2025, upon satisfactory completion of the follow-up audits carried out by AENOR, with no model non-conformities identified during the exercise.

Having completed the first three-year model certification cycle, at the end of 2025, AENOR Confía S.A.U. carried out another full model audit, certifying once again that the model complies with the requirements set forth in the aforesaid standards, UNE 19601 and ISO 37001, with no non-conformities identified on this occasion either.

As part of the commitment to the corporate crime prevention and anti-corruption model, and with a culture of ethics and compliance, all of the Bank's workforce is required, on a regular basis and whenever significant changes take place in the main policies on which it is based, to personally and individually undertake to follow Banco Sabadell Group's Corporate Crime Prevention Policy.

Banco Sabadell Group General Policy on Conflicts of Interest

The ultimate and fundamental goal of the Banco Sabadell Group General Policy on Conflicts of Interest is to ensure that all those subject to that Policy act in accordance with the ethical standards and principles that govern the Group's activities, creating a culture of compliance and an action model based on honesty, professional accountability and impartiality and on the basis of the following guidelines:

- Measures should be in place to prevent conflicts of interest.
- If conflicts of interest occur or could potentially occur, measures should be in place that enable these to be detected, recorded and promptly dealt with.
- If any conflicts of interest do occur, they should be eliminated or, where that is not possible, the nature and origin of the conflict should be revealed to the customer or to the competent decision-making bodies in each case, so that they may make the necessary decisions.

This Policy is the responsibility of the Compliance division. In addition, the Board of Directors of the Group's parent company is responsible for approving this Policy and it delegates its supervision and control to the Corporate Ethics Committee.

The Policy is applicable to all Group companies and, consequently, to their directors, managers, employees and partners and to any individual directly or indirectly related to them, as envisaged by the regulations applicable to the area in which the potential conflict of interest arises.

Banco Sabadell Group Policy on the Internal Reporting System and Protection of Reporting Persons

The purpose of the Policy is to comply with that provided in Law 2/2023, which transposes Directive 2019/1937, and specifically with the duty to have a policy that sets out the general principles of the Internal Reporting System and the Protection of Reporting Persons, covering the internal communication system and its corresponding channels.

According to the Code of Conduct, the Group must carry out its business activity in compliance with the law and in an ethical, honest and transparent manner and showing the utmost respect for its people. Therefore, the Group has placed the necessary means at the disposal of its stakeholders, both internal (shareholders, directors, managers or existing and former employees) and external (subcontractors, partners, suppliers, etc.), so that they may report any issue or sign of a breach of the Code of Conduct, of internal and/or external regulations, and/or of the possible commission of a crime of which they become aware as part of their work or professional activity, without fear of any kind of retaliation when used in good faith.

The commitment to a culture of ethics and compliance is demonstrated by the availability of pathways to report irregular situations or conduct, as well as by the adoption of adequate measures in the event of potential breaches or, where appropriate, rectification of their consequences to prevent the damage from recurring in the future.

The Policy is applicable to the whole of Banco Sabadell Group in all matters that do not conflict with the applicable legislation in the corresponding jurisdiction.

The Internal Reporting System is generally the preferred means to report actions or omissions that may involve a breach of the law, of Banco Sabadell Group's Code of Conduct, or of the other internal regulations of the Group. Queries or questions may also be put forward in that respect.

The Bank's Board of Directors, as the Institution's most senior decision-making body, is responsible for implementing an Internal Reporting System and for appointing someone to be responsible for its management and for approving the Policy.

The Compliance division is responsible for the Policy and is in charge of its development and wording, proposing the necessary amendments and/or updates.

4.1.2 Corruption and bribery

As part of its activities, Banco Sabadell Group undertakes to safeguard integrity and promote a culture of zero tolerance of corruption, expressly prohibiting any and all actions of this kind.

The Group undertakes to uphold the commitment undertaken as signatory of the United Nations Global Compact, with regard to compliance with the ten principles established therein, among them that of working against corruption in all its forms, including extortion and bribery. In keeping with this, the Anti-Corruption Policy has been developed considering, among other reference documents, the UN Global Compact's Guide for Anti-Corruption Risk Assessment.

The purpose of the Anti-Corruption Policy is to establish the applicable principles, critical management parameters, governance structure, roles and responsibilities, procedures, tools and controls relating to anti-corruption, and to ratify the firm commitment of the Group to abide by these rules as well as ethical standards and, in particular, its firm commitment to fight against corruption and to confirm the complete and absolute intolerance of any inappropriate behaviour. All this forms the Corporate Crime Risk and Anti-Corruption Management and Organisation Model. Ultimate responsibility for it lies with the Board of Directors, while the CEC is responsible for overseeing the functioning, observance and execution of that model, in accordance with the stipulations of the Policy and of the Corporate Crime Prevention Policy.

The unit responsible for this Policy is the Compliance division, which also undertakes responsibility for defining general guidelines relating to anti-corruption and for supervising their appropriate implementation.

The Policy is applicable to the activity carried out by Banco Sabadell Group through its companies in the various territories in which it operates.

Its subjective scope of application extends to the Group's directors, legal representatives and employees and to all natural or legal persons providing services to or in the Group, as well as all collaborating partners, professionals or firms subcontracted by the same.

As part of the commitment to the corporate crime prevention and anti-corruption model, and with a culture of ethics and compliance, all of the Bank's workforce is required, on a regular basis and whenever significant changes take place in the main policies on which it is based, to personally and individually undertake to follow the Anti-Corruption Policy.

The Group's Anti-Corruption Policy defines all acts that would qualify as corruption, as well as actions related to the topic that are not permitted. It is available to the entire workforce on the corporate intranet

and also to business partners, as it is also published on the corporate website.

As for the identification and control of risks related to corruption, it should be pointed out that a Corporate Crime Risk and Anti-Corruption Management and Organisation Model is in place, which is re-evaluated annually and has its own specific section on the fight against corruption. As a result of the activities carried out as part of the aforesaid model and the management of the whistleblowing channel, described above, no risks related to corruption materialised in 2025, or in 2024, 2023, 2022 or 2021.

The Institution carries out continuous monitoring of the effectiveness of its model through a variety of activities. These include monitoring the percentage of employees adhered to the Group's Code of Conduct, monitoring staff adherence to the Statement of Compliance with the Corporate Crime Risk and Anti-Corruption Management and Organisation Model, annual implementation of the Corporate Crime Prevention and Anti-Corruption Control Plan, and the attainment and annual maintenance of the relevant external certifications, including AENOR, UNE 19601 and ISO 37001.

The whistleblowing channel has a specific area dedicated to submitting reports of 'corruption / bribery', through which those covered by the personal scope of application may submit reports, which will be covered by the safeguards and dealt with and investigated in an independent and impartial manner, according to that provided in the Banco Sabadell Group Policy on the Internal Reporting System and Protection of Reporting Persons and its implementing procedure.

Particular importance is also attached to the oversight of loans and accounts held by political parties, by following a very rigorous customer onboarding protocol, and to the controls over donations and contributions received from third parties. Similarly, the Bank does not make contributions of any kind to political parties, politically exposed persons or related institutions. Likewise, in terms of transparency, all donations to NGOs and foundations are analysed and assessed by the Foundation's Board of Trustees. In relation to the Bank's sponsorship commitments, internal regulations are available containing criteria for their final approval or rejection.

In relation to incidents of corruption and bribery, it is important to note that in 2025:

- There have been no convictions or fines for breaches of anti-corruption and bribery laws.
- There have been no confirmed incidents of corruption or bribery in the Institution, with no employee having been dismissed or penalised internally for incidents related to this topic, and with no contract with business partners having been terminated or not renewed due to infractions related to corruption and bribery.
- At present, there have been no public legal cases regarding corruption or bribery brought against the undertaking and its own workers during the reporting period or during previous years.

Annual contribution: associations, groups and organisations

Categories	2022	2023	2024	2025
Lobbying, representation of interests or similar	0	0	0	0
Tax-exempt commercial associations or groups (for example, think tanks)*	€2,151,699	€2,098,368	€2,134,530	€2,649,568
Other (for example, expenses related to electoral efforts or referendums)	0	0	0	0

*In 2025, some of the largest sector contributions went to the Spanish Banking Association (€859,659), the Spanish Chamber of Commerce (€110,000), the Foundation for Applied Economic Studies (Fundación de Estudios de Economía Aplicada, or FEDEA) (€90,000), the Institute of International Finance (IIF) (€79,079) and the Foundation for Financial Studies (Fundación de Estudios Financieros, or FEF) (€30,000).

4.1.3 Anti-Money Laundering and Countering the Financing of Terrorism

Money Laundering and Terrorist Financing (hereinafter, ML/TF) are severe crimes that damage the global economy and represent a threat to worldwide social and financial stability.

Banco Sabadell Group is firmly committed to Anti-Money Laundering and Countering the Financing of Terrorism (hereinafter, AML/CFT), which is a key element of its fight against financial crime. It is essential to detect and prevent this type of illicit activity to protect and promote the integrity and trust of the markets and financial stability on a global scale.

For that reason, AML/CFT is a key pillar of the Institution's control framework. This model is applied in all entities of the Group, incorporating local regulations of the jurisdictions in which it is present, best practices of the international financial sector on this topic and the recommendations issued by international bodies, such as the guidelines issued by the Financial Action Task Force (FATF), the Wolfsberg Group, the Basel Committee on Banking Supervision (BCBS) and Spain's Commission for the Prevention of Money Laundering and Monetary Offences (Comisión de Prevención del Blanqueo de Capitales e Infracciones Monetarias).

Banco Sabadell Group has an Anti-Money Laundering and Counter-Terrorist Financing Policy in place, approved by the Board of Directors, which establishes the basic principles, critical management parameters, governance structure, roles and responsibilities, procedures, tools and controls applicable in relation to AML/CFT and which describes the main procedures through which ML/TF risks should be identified and managed at all levels of the Group. This Policy is published on the Group's corporate website and on the corporate intranet available to all employees.

The Group defines roles and responsibilities on the basis of the model of three lines of defence:

- a. 1st line of defence, formed of business and management units;
- b. 2nd line of defence, which includes Compliance and Internal Control; and
- c. 3rd line of defence, comprising Internal Audit.

The Group's AML/CFT units are integrated in the second line of defence and their goal is to ensure the fulfilment of legal obligations in relation to AML/CFT. The function comprises one Group unit as well as local units in each of the obliged parties, led by designated officers in each of the geographies in which Banco Sabadell operates. In this respect, the Group's international presence means that it is subject to supervision by different regulators, requiring it to comply with a variety of regulatory requirements, which in turn requires it to have a global and cross-cutting risk management and control model.

It also has an Internal Control Body (hereinafter, ICB), which meets on a regular basis and whose mission is to oversee the implementation and effective fulfilment of its policies and procedures, thereby ensuring that ML/TF risk is appropriately managed in the Group.

The Group seeks to develop and continuously improve its ML/TF risk management model, which in accordance with Spanish regulations is reviewed annually by independent experts. In 2024, the external expert in question noted that Banco Sabadell Group has adequate control and detection systems in place designed to comply with anti-money laundering and counter-terrorist financing regulations.

In terms of training, each Group entity has an annual training plan. This plan outlines the training actions stipulated for the current year and the mandatory AML/CFT courses of each function, for both new recruits and existing staff. Employees are required to complete all AML/CFT training sessions assigned to them, so that they may prevent, avoid and/or detect any instances of money laundering and/or terrorist financing in the course of their professional activities. Completion of all training actions is duly validated and the level of completion of the annual training plan is documented.

4.1.4 Business conduct training

In order for the workforce to have a detailed understanding of the content of the Code of Conduct, including the identification, reporting and management of conflicts of interest, thus enabling them to effortlessly comply with it, and in order to promote familiarity with the main aspects of the criminal liability of legal persons, the risks in relation to corruption and bribery, types of corruption, prohibited actions and their consequences, and the existence, operation and safeguards of the whistleblowing channel, all employees are required to complete mandatory specific training courses on each of those subjects, which are reviewed regularly and updated as required.

In addition, employees are required to complete training on the Internal Code of Conduct in relation to the Securities Market (*Reglamento Interno de Conducta*, or RIC). The aim of the course is to explain what that code consists of, whom it affects and what restrictions it imposes. It also covers all circumstances in which an employee is required to comply with the RIC and the associated obligations. In addition, it teaches how to use the RIC portal, indicating the information that is available there and how it works. It also covers breaches, penalties and the role of the Corporate Ethics Committee.

The courses that employees are required to complete in relation to business conduct, along with the percentage completion of those courses, is shown here below:

Course	% completion
Code of Conduct	98.9%
Internal Code of Conduct relating to the securities market (RIC)	97.0%
Anti-Corruption	99.5%
Corporate Crime Prevention	99.5%
Whistleblowing channel and protection of reporting persons	98.8%

In addition, in order to facilitate continuous and voluntary learning with new and interesting formats, such as infographics, short videos, comic strips, posts, etc., the Bank's workforce is given access to the training space known as the 'Regulatory School'. This space has different sections called 'classrooms' dedicated to specific topics such as anti-money laundering and counter-terrorist financing, data protection, and ethics and conduct. In the last of these classrooms, staff have access to content related to corporate crime, so that they may learn what it consists of and become familiar with risks of corruption and bribery, conflicts of interest, how to identify them, how to manage them and where to report them, and with the whistleblowing channel, specifically how it works, the safeguards that it provides and how to access it. In addition, in the section dedicated to 'Conduct', they can find the relevant materials, related information and the Group's own Code of Conduct as well as the Suppliers' Code of Conduct.

On a regular basis, Banco Sabadell's Board of Directors also receives training in relation to corporate crime prevention, the prevention of corruption, and on the corporate crime and anti-corruption organisation and management model.

4.1.5 Internal Reporting System - Whistleblowing channel

As part of its commitment to a culture of ethics and compliance, the Group has an Internal Reporting System for reporting, in general, actions or omissions that could entail a breach of prevailing legislation, of the Group's Code of Conduct or of other internal regulations.

The Group has a whistleblowing channel available to its stakeholders and subsidiaries.

Banco de Sabadell, S.A., as the Group's parent company, has a whistleblowing channel available to its stakeholders and subsidiaries (except those in Mexico and the UK, which have their own channels), as a formal whistleblowing mechanism, one of the guiding principles of which is the protection of the reporting person.

As mentioned previously, the Institution has a Policy and Procedure for the Internal Reporting System and Protection of Reporting Persons that describe the principles and safeguards of the Internal Reporting System and the process and main stages of the management of whistleblowing reports.

The CEC is responsible for the Group's Internal Reporting System in the case of the Bank and subsidiaries, except those in Mexico and the

United Kingdom, where their respective Boards of Directors have assigned responsibility for taking action to the Audit Committee in the case of Banco Sabadell, Institución de Banca Múltiple in Mexico, and to the person designated as Whistleblower Champion in the case of TSB.

In this respect, the CEC is responsible for managing the Group's Internal Reporting System and also the whistleblowing channel, as one of its components.

The CEC, as a collegial body, delegates to its Secretary, who is a CEC member and the Chief Compliance Officer (CCO), the role of managing the whistleblowing channel and processing whistleblowing reports, within the scope that may be determined, at any time, in the CEC's Rules of Procedure.

The CEC and, by delegation, the CCO, shall carry out the role of Head of the Reporting System independently and autonomously of the administrative or governance bodies, committees or staff of the Institution and its Group, provided this is so envisaged in the prevailing legislation, without taking instructions of any kind in the performance of their duties, and they shall have access to all human and material resources necessary to carry out their role. Thus, the CEC, and by delegation the CCO, shall have at their disposal the human resources assigned to Compliance to carry out their role, and may request support from the staff of that function and, within it, the Corporate Crime Prevention and Code of Conduct Management unit.

The channel is hosted on a platform that can be accessed through the Banco Sabadell Group website (<https://canaldenunciasgrupo.bancsabadell.com>) and it is the main method used to report, detect and manage potential irregularities that could undermine the aforesaid commitment or that could constitute the commission of a crime. Any Group employee or related person (subcontractors, partners, suppliers, etc.) must report any information or sign of a breach of the Code of Conduct or of the commission of a potential crime of which they become aware.

As for the regular reporting on the activity and operation of the Internal Reporting System, the CEC prepares a quarterly report on its activity, and the Board Audit and Control Committee and the Board of Directors are informed on a semi-annual basis of the number of reports received during the corresponding period, the channel of origin, the type of report, the type of reporting person (named or anonymous) and the outcome of the investigation, together with the possible application of the internal penalties regime stemming from the reports filed or other corrective measures agreed, and their date of application. Those same reports also include information relating to the reports managed through the internal systems of TSB and Banco Sabadell Mexico.

In order to become familiar with the operation and safeguards of the internal whistleblowing channel, the workforce is required to complete a mandatory course on the channel and on the protection of reporting persons, which includes all of the new content related to Law 2/2023.

Similarly, in the 'Regulatory School', the workforce has access to a space dedicated to 'Corporate Crime and Anti-Corruption', within the 'Ethics and Conduct' classroom, which contains specific content about the whistleblowing channel, specifically what it is, who it is for, how to use it, how to access it, the details that must be indicated in any reports, the safeguards that it offers and its ultimate goal.

Staff from the Corporate Crime Prevention & Code of Conduct Management unit have the necessary training to adequately perform their duties of managing the whistleblowing channel and dealing with any reports submitted.

In accordance with the Procedure for the Internal Reporting System and Protection of Reporting Persons, staff that file a report are protected in accordance with that set forth in Directive (EU) 2019/1937, which was transposed into Spanish law through Law 2/2013, specifically:

- Ensuring anonymity and confidentiality. Staff may submit reports on a named or, if they prefer, anonymous basis, in which case the Institution will not attempt (and will ensure that the rest of the Group does not attempt) to uncover their identity. If they do decide to identify themselves, their identity and that of any other person concerned is guaranteed to be kept in the strictest confidence, as is any information that they provide and their personal data.
- Ensuring the absence of any retaliation against reporting persons acting in good faith, declaring any acts that constitute retaliation or threats, or any attempted retaliation or threats, to be invalid. To that end, the requisite measures will be adopted to prevent and avoid retaliation against the reporting person.

Similarly, where appropriate and possible, Banco Sabadell will check in with the reporting person on a regular basis, in accordance with that provided in the Internal Non-Retaliation Protocol.

All reports submitted through the channel have been duly investigated and processed. The Procedure for the Internal Reporting System and Protection of Reporting Persons sets out all stages involved in dealing with reports submitted through the channel, such as:

- Receipt, acknowledgement of receipt to the reporting person, record-keeping and decision-making regarding the report's admissibility or inadmissibility.
- Information provided to the parties: reporting person and reported person.
- Opening of the case file and appointment of the investigator.
- Issuance of the internal investigation report and proposed resolution (archiving or adoption of corrective measures/application of the internal penalties regime) and closure of the case file.

A total of 113 reports had been received as at 31 December 2025. The types of reports that received the highest number of communications were those related to alleged breaches of the code of conduct and internal regulations (18), privacy and/or data processing issues (14), cases of internal fraud (11), and workplace harassment/sexual harassment/discrimination cases (11). Other less frequently reported cases were those related to alleged breaches of regulations concerning money laundering, terrorist financing and/or international sanctions, and cases related to conflicts of interest, which received 3 and 2 reports, respectively. No reports were received during the period related to any breach of banking regulations with regard to market abuse or securities market manipulation.

Of the total number of reports received, 17 were accepted for processing and investigation; of those investigated, 5 are currently ongoing and 12 have been completed. Of the completed cases, a breach was found to have occurred in just 5 cases, with disciplinary measures taken on 2 occasions and corrective measures applied in the other 3 cases. No disciplinary dismissals have taken place.

None of the reports investigated resulted in the confirmation of cases related to corruption or bribery, or to human rights violations in Banco Sabadell Group.

In accordance with that set forth in the Equality Plan, any report aimed at exposing a possible act of discrimination, workplace and/or sexual harassment or gender-based harassment is channelled through the whistleblowing channel. Once the report has been admitted for processing, the Harassment Prevention Committee will run point and lead the investigation.

Through the whistleblowing channel, a person within the personal scope of application may report cases related, among other things, to corruption/bribery, human rights violations, or to breaches of bank regulations, the Code of Conduct, or internal regulations.

In accordance with that provided in the Anti-Corruption Policy, no distinction is made between areas that may have greater or lesser exposure to risks of corruption and bribery. That Policy is applicable to the directors, legal representatives and employees of the Group and to all natural and legal persons providing their services in the Group, as well as collaborating partners, professionals or entities subcontracted by the same.

As part of the commitment to the corporate crime prevention and anti-corruption model, and with a culture of ethics and compliance, all of the workforce of Banco de Sabadell, S.A. and its domestic subsidiaries is required, on a regular basis and whenever significant changes take place in the main policies on which it is based, to personally and individually undertake to follow Banco Sabadell Group's Corporate Crime Prevention Policy and the Anti-Corruption Policy.



4.2 Management of relationships with suppliers

To achieve the strategic objectives defined by Banco Sabadell Group in a competitive and continually changing environment, it is imperative to ensure proper management of relationships with third parties who, instead of being mere suppliers of goods and services, become partners and collaborators who are aligned in the achievement of the Group's objectives, placing their tools, resources and expertise at the disposal of Banco Sabadell Group. Banco Sabadell Group also undertakes to fulfil its objectives and commitments related to sustainability (including its environmental, social and governance components), extending them to its entire supply chain.

In order to establish this long-term cooperation, it is also necessary to understand the needs and goals of suppliers, maintaining a willingness to honour their commitments and making them compatible with Banco Sabadell Group's requirements and vision. Under this premise, to meet its objectives related to the management of relationships with suppliers, Banco Sabadell Group extends its commitment to socially responsible practices to the supply chain, expressly including the defence of human rights, labour rights, freedom of association and environmental rights, among others, throughout the entire supplier management process, from supplier accreditation and procurement, to the provision of services and their control and management.

In this respect, Banco Sabadell Group has a Procurement Policy (which includes outsourcing as a subtype of procurement), as well as various related procedures, which establish the mechanisms and controls for proper management of the actual and potential impacts of any engagement of third parties, in the interests of effective management of the risk arising from third-party relationships. These policies and procedures establish observance of the following principles related to the management of relationships with suppliers:

- a. Cost-benefit analysis: any purchase of goods or engagement of services must be made with the intention of obtaining a greater benefit relative to the cost incurred and considering the associated risk. Specific analyses might be necessary in cases where this may be less evident.
- b. Lack of resources: needs requiring a solution must be met.
- c. Competition guarantee: fair competition and equal opportunities among suppliers must be ensured, always provided they meet the minimum requirements, including obligations in relation to social responsibility.
- d. Retention of capabilities and responsibilities: procurement should not diminish the ability of Banco Sabadell Group to provide services to its customers.

- e. Control: on no account does external procurement prevent or limit effective on-site or remote supervision, nor does it contravene any restriction on services and activities imposed by the supervisory body, thus permitting ongoing control of the outsourced processes.
- f. Sustainability: Banco Sabadell Group must encourage the selection of suppliers that apply best practice in terms of ethics, social and environmental aspects, as well as good corporate governance; suppliers that respect fundamental human and labour rights when conducting their activities and are working towards applying the same throughout their value chains.
- g. Restrictions on outsourcing: for procurement items affected by the EBA Guidelines on outsourcing arrangements (EBA/GL/2019/02), no outsourcing entailing the delegation of the responsibility of either the Board of Directors of Banco Sabadell or the management bodies of the subsidiaries that alters their relationship with and obligations to their customers, violates the conditions of their authorisation or modifies any of the conditions that enabled the granting of the above-mentioned authorisation is permitted.

The supplier engagement process comprises various phases:

Identification of need

Banco Sabadell Group's business units identify a need and take the decision to formally request the procurement of goods or services that address that need.

Categorisation and identification of impacts

Following the request, and as a result of the provisions set forth in DORA (Regulation (EU) 2022/2554) and the EBA Guidelines (EBA/GL/2019/02), the regulatory impacts are analysed and the services are arranged in categories, classified according to how important or essential they are: essential ICT, basic ICT, essential outsourcing, non-essential outsourcing. Other services are categorised as critical or non-critical to business continuity.

Analysis and management of associated risks

Banco Sabadell Group has a systematic process to assess and manage risks associated with the procurement of goods and services from third parties, in accordance with their materiality or relevance. Banco Sabadell Group carries out a risk assessment before entering into a new agreement, or when a service undergoes any material change or when the existing risk assessment is outdated. In all cases, it performs a new risk assessment each year for essential services and once every three years for non-essential services.

In addition, in relation to information security and the protection of data owned by Banco Sabadell Group and to which suppliers have access, an analysis is carried out prior to engaging their services that are sensitive in this regard, and specific monitoring exercises are carried out depending on the supplier's inherent risk.

Selection of the engagement strategy

The procurement function ensures the suitability of the supplier during the selection and negotiation process, by assessing the supplier's good professional reputation, appropriate and sufficient capabilities, technical knowledge, competence, resources (human, technological and financial), organisational structure and, if applicable, the required authorisation(s) or registration(s). The ESG score is a decisive factor in the supplier selection process and, in the event of equal offers, the supplier with the best score will be selected. The Group also has mechanisms to monitor for conflicts of interest and to prevent corruption risks in the supplier management process. The Procurement Management team proposes the best negotiation strategy according to the nature, scale and complexity of the goods or services to be acquired.

Open competitive tendering is a frequent method of procurement. The principle of fair and equitable competition shall ensure that Banco Sabadell Group benefits from the best value for money by requesting the participation of several qualified suppliers. The principle of equality requires Banco Sabadell Group to avoid discriminating against any supplier to the detriment or benefit of other suppliers.

Furthermore, exceptions to the competitive bidding process (also called direct purchases) must be fully justified and approved in accordance with the procedure established by the procurement function of each subsidiary.

Regulatory and legislative impacts of the procurement process are identified, thereafter deciding on the most suitable purchase process (e.g. tender process led by the Purchasing division, tender process delegated to the unit that put forward the request, bilateral negotiation captained by the Purchasing division).

Accreditation

The accreditation process, a prerequisite for a supplier to be awarded a contract to provide goods or services, ensures that suppliers meet the standards set out in Banco Sabadell Group's various policies and comply with the Supplier Code of Conduct, which all suppliers must expressly adhere to in the absence of their own code containing equivalent principles and values, and which comprises:

- Adherence to the United Nations Global Compact, whose ten principles include the protection of human rights, the elimination of forced labour and child labour, freedom of association, the eradication of discriminatory practices, environmental responsibility and the fight against corruption.
- Compliance with the International Labour Organization (ILO) conventions, particularly those related to child labour, forced labour, remuneration and equal opportunities, and freedom of association.

Furthermore, in order to proceed with the accreditation process, suppliers must provide, among other documentation, their legal documentation, financial information, quality certificates, tax clearance certificates proving they are up to date with their social security payments and tax obligations (or similar certificates to that effect depending on the geography), as well as their policy on Corporate Social Responsibility (CSR) and aspects related to sustainability.

Supplier engagement

The agreement to procure goods or services sets out all information generated at each of the aforementioned stages of the procurement process in the contract signed between the parties. The agreement must therefore include at least the following information:

- A clear description of the goods or services to be procured
- The start and end date, as appropriate, of the agreement and notice periods
- The governing law of the agreement. In this respect, for procurement items categorised as ICT or Outsourcing, the agreement should include all the requirements specified in the DORA and EBA regulations, respectively
- The financial obligations of the parties
- The right of the institution requesting the procurement to monitor the provider's performance on an ongoing basis
- The location or locations (that is, regions or countries) in which the goods will be procured or the service will be provided or where the corresponding data will be kept and processed
- The service levels agreed (if applicable)
- Other obligations of the supplier, such as, whether the supplier needs to take out mandatory insurance against certain risks

In addition, the standard contract with suppliers includes clauses concerning the respect of human rights and the observance of the ten principles of the United Nations Global Compact in that regard, also including labour rights, the fight against corruption, restrictions on lending and investment in activities in the arms industry, and the equality plan.

Banco Sabadell Group ensures compliance with the laws and regulations applicable at any given time, with contracts stipulating the ability to require suppliers to adapt their activities and service level agreements to those regulations.

Supplier engagement in the international network is decentralised, hiring mostly local suppliers and affecting only products for sole use by the relevant subsidiary in its day-to-day activities. The hiring of local suppliers (those whose tax identification number coincides with the country of the company receiving the goods or services) contributes to the economic and social development of the regions in which Banco Sabadell Group operates.

Monitoring

Banco Sabadell Group applies capacity, prudence and due diligence in the monitoring and management of procurement agreements for goods or services, ensuring that appropriate levels of performance and quality are met, paying particular attention to aspects related to the availability and integrity of services, the security of information, personal data, and occupational hazard prevention.

In this respect, Banco Sabadell Group monitors its suppliers with regular oversight of the agreed service levels, as well as regular checks on their compliance with the contractual obligations and resilience metrics.

Audits

Internal Audit has periodically performed assessments of procurement processes in general, and specifically of suppliers associated with outsourced processes (EBA/GL/2019/02 criteria) and information and communication technology services (DORA - Regulation (EU) 2022/2554). It should also be noted that 11 audits based on ESG criteria were carried out in 2025, of which only one requires major improvements.

The results of the audits did not raise any critical recommendations and the non-critical recommendations made will be corrected in accordance with the implementation plan.

Information about suppliers

As at the end of December 2025, the top 20 suppliers represented 46% of all supplier invoicing. In Spain, the top 20 suppliers represented 38.2%. Other noteworthy aspects are included in the following table:

	2023	2024	2025
Total number of suppliers who had invoiced more than 100,000 euros as at year-end (1)	845	742	788
Percentage of suppliers of critical services (out of total suppliers)	7.7%	8.9%	12.1%
Total number of accredited suppliers (2)	2,303	2,270	1,899
Proportion of invoicing from suppliers with ESG assessment in categories A+, A or B (3)	N/A	N/A	93.1%
Amount invoiced by Special Employment Centres	€3.1m	€2.9m	€3.4m

These figures exclude those relating to brokerage, securities firms, subsidiaries, duties and taxes, pension funds, homeowners' associations, SOCIMIs (REITs) and rental of premises.

(1) Full year 2025 includes 561 suppliers in Spain, 138 suppliers in TSB, 46 suppliers in Mexico, and 43 suppliers in foreign branches, including 34 in Miami, 3 in London, 2 in Paris, 2 in Morocco and 2 in Lisbon.

(2) Full year 2025 includes 1,041 suppliers in Spain, 324 in Mexico, 491 in TSB and 43 in foreign branches with billing of > €100,000. The reduced number of accredited suppliers reflects an exercise carried out to update suppliers who did not have an assigned contract and have been removed from the calculation.

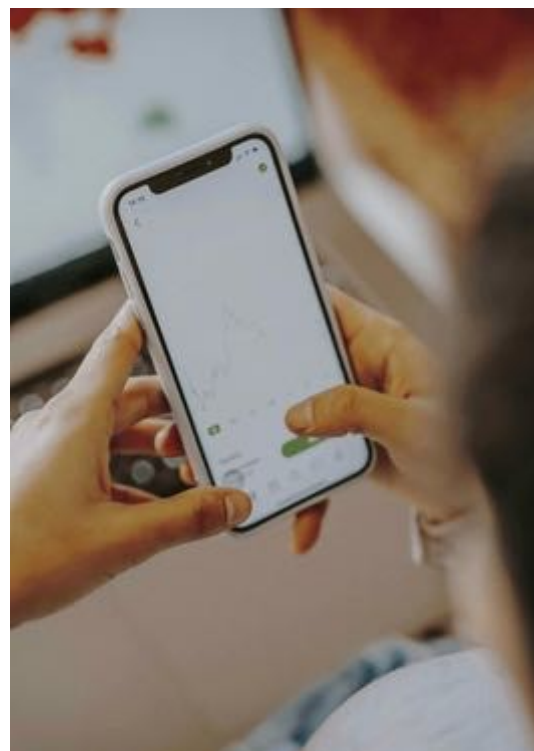
(3) The ESG assessment of suppliers ranks them in 5 categories: A+ (platinum), A (gold), B (silver), C and D.

Policy to prevent delays in payments to suppliers

To prevent delayed payments, Banco Sabadell has an internally developed platform that serves as an in-tray for invoices, in which suppliers upload their own invoices, thus preventing them from being lost. This platform serves not only as a channel for receiving and approving invoices, but also as a documentation repository.

Once submitted by suppliers, invoices undergo an approval workflow in which managers approve their respective invoices and, once approved by all corresponding levels, they are relayed to the Invoices Management unit so that each invoice may be formally and fiscally validated and entered in the accounts. The time available for validation and account entry is four days (two for validation and two for accounting), although usually the entire process is completed within two to three days at most.

In addition, the Bank's regulations state that on the 10th and 25th of every month, payments should be launched to all suppliers; however, since March 2020 (due to the pandemic) to date, payments have been launched on a weekly basis.



4.3 Tax responsibility

Banco Sabadell Group's commitment to sustainability is reflected in the promotion and development of responsible tax management, fully aligned with the Sustainable Development Goals (SDGs) approved by the United Nations.

Consequently, the action principles followed for tax matters are geared towards compliance with the SDGs, particularly those related to fostering a fairer, more respectful, sustainable and cohesive society (e.g. "No poverty", "Reduced inequalities"), SDG 8 "Decent work and economic growth" being one of the priority goals for the Group according to the Group's Sustainability Policy⁷⁷, which is closely related to tax affairs.

Tax strategy

The principles of the Group's fiscal activity are set out in the tax strategy, which is defined and approved by the Board of Directors⁷⁸. Thus, the Tax Strategy is the reference framework for the Group's activities in relation to tax and, as such, it is designed to be stable and permanent. In any event, the tax division revises the Tax Strategy at least once a year and brings any relevant updates to the attention of the Board of Directors, ensuring alignment with any developments in the Group's tax commitments, regulatory changes, and any other developments that may have taken place in this environment⁷⁹.

The Tax Strategy must be complied with by all companies controlled by the Group, regardless of their geographical location, without prejudice to any adaptations required to meet the specific regulations of each jurisdiction, as is the case in the United Kingdom. These transpositions must observe the principles, values and common action guidelines set out in the aforesaid Tax Strategy. Furthermore, the Group advocates that investments controlled jointly with partners outside the Group, or those that involve significant shareholdings, adopt principles of action in tax matters that are aligned with the aforesaid tax strategy.

The principles and guidelines for implementing the Tax Strategy are defined in consonance with the Group's mission, values and business strategy, based on ethical and responsible management. This commitment drives the activity to generate a positive impact on society as a whole. In the same vein, the business strategy is directed towards profitable growth that generates value for shareholders, maintaining a conservative risk profile, as part of the framework of ethical and professional codes, considering the expectations of the different stakeholders.

To that end, the Group has a set of policies, internal rules and codes of conduct in place that guarantee ethical and responsible behaviour throughout the organisation and in all of its activities.

In this respect, the Group's Code of Conduct establishes the fulfilment of tax obligations in accordance with the principles set out in the Tax Strategy and adherence to the Code of Good Tax Practices – *Código de Buenas Prácticas Tributarias*, or CBPT – (in which the principles of transparency, good faith and mutual trust stand out in particular) as fundamental elements involved in fulfilling its commitment to the

⁷⁷ The Sustainability Policy can be viewed on the corporate website: [Policies, codes and rules](#).

⁷⁸ The Tax Strategy can be viewed on the corporate website: [Tax responsibility](#).

⁷⁹ The most recent update of the Tax Strategy was approved by the Board of Directors of Banco Sabadell in 2023.

economic development of societies in all jurisdictions in which it operates⁸⁰.

In order to detect and manage anything that could compromise the aforesaid ethical and responsible conduct, the Group has a whistleblowing channel that enables the reporting of any concerns related to these practices in any field, including tax, and that represents an additional channel for participation and dialogue with different stakeholders, consistent with the interaction framework promoted by maintaining a cooperative relationship with the tax authorities and an ongoing dialogue with other stakeholders in forums, associations and in spaces for sectoral and academic collaboration.

General principles of the Tax Strategy

The principles set forth in the aforesaid Tax Strategy are the principles of efficiency, prudence, transparency and minimisation of tax risk, which aim to ensure compliance with current tax legislation by promoting responsible and transparent actions with regard to tax, in accordance with the requirements of customers, shareholders, tax authorities and other stakeholders. These principles are the following:

- Guarantee and ensure compliance with and observance of the tax-related laws and regulations in effect in each and every one of the countries and territories in which the Group's companies operate and/or are present, as well as the international guidelines and principles stipulated in tax matters by the Organisation for Economic Co-operation and Development (OECD), by means of a reasonable interpretation of the regulations that takes into account both their literal meaning and their spirit and purpose.
- Establish tax criteria on a sound legal basis, grounded in existing doctrinal and jurisprudential criteria, as well as international guidelines and standards.
- Verify that transactions are carried out only where there are sound commercial and business reasons, whilst ensuring that tax efficiency is not prejudiced in the achievement of such an objective.
- Conduct the prior analysis of the tax implications of transactions with the aim of minimising tax risks, including reputational risk.
- Design and market banking products, assessing all their tax implications, which will be clearly and transparently communicated to customers.
- Value related-party transactions, as legally defined at all times, on the basis of the arm's length principle in the terms established by the OECD, taking into account the functions, assets and risks of the parties involved, and observing the recommendations approved by this body.
- Avoid structures or entities of an opaque nature or resident in territories classified as tax havens / non-cooperative jurisdictions whose purpose would be to reduce the tax burden of Banco Sabadell Group. In the event of a presence or transactions in these territories, it shall be for economic and business reasons.
- Encourage constructive and collaborative relations with tax authorities on a reciprocal basis of good faith and transparency, guided by institutional respect and seeking mutually agreed solutions in case of divergent views. As an example of these initiatives, Banco Sabadell has adhered to the CBPT of the Spanish Tax Authority, acting collaboratively and in line with the recommendations set out in that text.

In addition, the Tax Strategy establishes that the Group shall disclose relevant tax information in a direct, clear and transparent manner to its customers and shareholders, tax authorities and other stakeholders, taking their expectations into account.

In this way, the Tax Strategy is aimed at ensuring responsible and transparent tax management, aligned with the Group's mission, values, business strategy and commitment to sustainability, which in turn fosters trust among its stakeholders.

The Group has an all-encompassing understanding of responsible tax management, perceiving it as a concept that combines the goals stemming from the principles and guidelines set out in the Tax Strategy, namely: (i) regulatory compliance in order to generate stable and predictable environments that favour legal certainty and reduced litigation, (ii) promotion of a cooperative relationship with the tax

⁸⁰ Banco Sabadell Group's Code of Conduct can be viewed on the website: [Internal regulations](#).

authorities, based on transparency, good faith and mutual trust, or (iii) application of the principle of transparency in the disclosure of tax information so as to meet stakeholders' expectations.

All these elements are integrated in the concept of responsible tax management, under a dynamic approach, to enable continuous progress by adopting and adapting best practices in this area, in line with the development of stakeholders' expectations. This approach is reflected in the Group's commitment to sustainability, which incorporates a specific target related to responsible and transparent taxation⁸¹.

Compliance with the Tax Strategy: Management and Control Framework

The attainment of the objectives set out in the Tax Strategy and compliance with the fundamental principles that govern it are ensured through the establishment of a tax risk management and control system, which is embedded in Banco Sabadell Group's Global Risk Framework.

In this respect, the Group's Tax Risk Policy, which is reviewed and updated annually, develops the action framework established in the Tax Strategy. The Policy aims to ensure that any tax risks that could affect the Tax Strategy are identified, assessed and managed in a systematic way. This is done through their categorisation – risks arising from differences of interpretation or the application of tax regulations, or from legislative changes or modification of administrative and case law criteria, and compliance risks or operational risks, among others – and their proactive management, in order to anticipate, detect and respond to possible risk situations in an appropriate and timely manner. It also establishes a governance structure in charge of tax risk management and control, which ensures compliance with the Tax Strategy, as well as integration into the organisation of the fiscal approach, which operates under a framework that does not provide incentives, nor does it incorporate remuneration targets, linked to obtaining tax savings.

The core principle of this structure is the direct involvement of the entity's governing and management bodies within a corporate model based on three lines of defence, with a clear assignment of roles and responsibilities and an adequate level of separation and independence to avoid compromising the effectiveness of this model.

In terms of the roles and responsibilities of the model of three lines of defence:

- The first line of defence includes (i) the business and support units responsible for complying with Banco Sabadell's obligations in tax matters, and for managing the corporate and operational processes that produce the information and data necessary for the correct calculation of taxes and for the reports submitted to public authorities, and (ii) Tax Advice, which ensures the proper application and due compliance with the principles governing the Tax Strategy by establishing fiscal criteria applicable to tax-related matters and promoting actions aimed at increasing the level of knowledge and awareness about tax risk in the Group. An example of such actions is the effort to keep on top of the ever-changing tax regulations and standards in relation to tax responsibility; these tasks are carried out through recurrent reviews by the experts dedicated to this topic, who prepare the corresponding communications that are then supplemented with the necessary explanations and training content aimed at the units affected by any tax-related amendments, generating a process of fluid and continuous communication.
- The second line of defence includes Internal Control which, in general terms, must ensure that the first line of defence is well-designed and performs its assigned duties, with a view to its continuous improvement.
- Finally, the role of supervision performed by the third line of defence is carried out by Internal Audit, whose mission consists of helping the Group to achieve its objectives by providing a systematic, disciplined approach to assess the sufficiency and effectiveness of the organisation's governance processes and its risk management and internal control activities.

⁸¹ The Commitment to Sustainability is published on the corporate website and can be found using the following link: [Commitment to Sustainability](#).

To this end, the Board Audit and Control Committee oversees the Group's tax management, specifically monitoring of the implementation of the tax strategy and its guiding principles, through periodic reports received from the Tax Advice division on activities carried out to properly analyse tax matters, the Group's adaptation to changes made to the tax regulations (new reporting requirements or tax figures, such as the tax on net interest and commission income of certain financial institutions or the Global Minimum Tax - Pillar Two), the most significant tax procedures, the main actions related to Corporate Tax Governance and to the promotion of transparency and a collaborative relationship with the tax authorities (such as voluntary submission of the Annual Tax Transparency Report (Informe Anual de Transparencia Fiscal, or IATF) for the financial year 2024, or the implementation of the stages subsequent to the submission and receipt of the IATF for 2023, or participation in the Large Companies Forum)⁸².

It also ensures the continuity of the management and control system, which guarantees the application of the principles laid down in the tax strategy, through mechanisms for the smooth succession of certain positions, as provided in the Group's internal regulations.

Collaborative relationship with the State Tax Agency, Good Tax Practices and Transparency

In line with the principle established for the promotion of a collaborative relationship with the tax authorities, Banco Sabadell is adhered to the CBPT, approved by the Large Companies Forum, of which it is a member, and acts in accordance with the recommendations contained therein. In this respect, Banco Sabadell voluntarily submits the IATF report each year to the State Tax Agency (Agencia Estatal de Administración Tributaria, or AEAT), as well as transfer pricing documentation⁸³.

It also collaborates proactively with the competent authorities, responding to their requests and participating in the forums and cooperative programmes promoted by local authorities, such as the Large Companies Forum, in order to help strengthen the tax system and prevent the generation of tax litigation and tax-related disputes⁸⁴.

Additionally, through its subsidiary in the United Kingdom, it follows the Code of Practice on Taxation for Banks, promoted by the UK tax authorities, complying with its content.

In line with the principle of transparency, the Group discloses relevant tax information directly, clearly and transparently to its customers and shareholders, to the tax authorities and to other stakeholders; this information is also included in the various documents accessible on its corporate website (Tax Strategy, Annual Financial Statements, Board Audit and Control Committee report, Tax Responsibility and Good Taxation Practices documentation, etc.).

⁸² The report on the operation and activities of the Board Audit and Control Committee available on the corporate website: [Committee Reports](#) contains details of the most important matters in the financial year 2025.

⁸³ The IATF report for the 2024 financial year was sent to the AEAT in October 2025.

⁸⁴ Information on this topic can be found in the document "Tax Responsibility and Good Practices of Banco Sabadell Group", which is available on Banco Sabadell's website. Details about the status of the main tax disputes and the years open to tax inspection can be found in Banco Sabadell Group's consolidated annual financial statements for 2025 (Note 39 – Tax situation).

The Group aims to meet the expectations of different stakeholders by promoting close, transparent and constructive dialogue with them.

In this respect, the Group aims to meet the expectations of different stakeholders by promoting close, transparent and constructive dialogue with them. This approach is reflected, on one hand, in the collaborative relationship it maintains with the tax authorities and, on the other hand, its active participation in events and spaces for technical and specialised dialogue with other stakeholder groups. This participation is channelled, among other ways, through (i) its presence in the tax committees of various associations in which current tax matters are analysed, such as the Spanish Banking Association (Asociación Española de Banca, or AEB), the Spanish Confederation of Business Organisations (Confederación Española de Organizaciones Empresariales, or CEOE) or the Spanish International Chamber of Commerce (Cámara de Comercio Internacional española, or ICC España), and (ii) its participation in forums and events organised by professional associations, non-governmental organisations and academic institutions, which constitute spaces for reflection and technical/legal debate on key tax matters. These forums address matters of particular relevance, such as (i) the growing complexity arising from continuously changing legislation or modifications of administrative and case law criteria in tax matters, their impact on economic activity and business planning, as well as the resulting challenges in terms of compliance with regulations and the need to preserve and strengthen an environment of legal certainty and reduced litigation, (ii) aspects linked to responsible tax contribution, the importance of tax transparency, alignment with international best practice in good tax governance and risk prevention as key factors to bolster confidence in the stability of the current fiscal framework among stakeholders and, ultimately, in society, and (iii) the role of companies as partners of the tax authorities collaborating in the management, collection and control of taxes. The Group participates in these spaces by sharing its views based on the ethical principles of integrity and tax responsibility which underpin its position in this area, contributing to the depth and quality of analysis and dialogue in order to promote the continuous and progressive development of a well-functioning tax system from a constructive and pluralistic perspective.

In this context, the Group monitors different transparency and tax responsibility initiatives, in the national and international spheres, in order to identify significant aspects and emerging trends in the area of sustainability, with the aim of continuously progressing in this area and to integrate best practices into its organisation.

This commitment to the principle of transparency has been recognised by (i) Fundación Haz, which awarded Banco Sabadell the “t for transparent” label, having complied 100% with the indicators related to tax information for the financial year 2024, a distinction that the Institution earned at the highest level since the award was created in 2022, and by (ii) the Dow Jones Best-in-Class Index (previously known as the Dow Jones Sustainability Index, or DJSI), developed by S&P Global, which evaluates the sustainability performance of leading companies worldwide and which awarded the Group the highest possible score (100%) in fiscal sustainability. These accolades demonstrate Banco Sabadell Group’s firm commitment to responsible tax management and to clear and transparent communication of tax information to its stakeholders.

Presence in tax havens / non-cooperative jurisdictions

In accordance with the corporate principles governing its tax strategy and the CBPT to which it adheres, Banco Sabadell Group has undertaken a commitment to avoid opaque structures or entities resident in tax havens/ non-cooperative jurisdictions, unless their presence or operations are justified on economic or business grounds. Therefore, given that there is no single definition of the concept of a tax haven / non-cooperative jurisdiction, the Group takes into consideration the lists of tax havens / non-cooperative jurisdictions set out in applicable regulations in Spain⁸⁵ and the criteria of the EU⁸⁶ and the OECD⁸⁷, which are elaborated on the basis of a series of characteristic aspects, such as lack of transparency, low or non-existent taxation, or the absence of any regulations that allow the exchange of information.

Thus, pursuant to the commitment it has taken on, Banco Sabadell Group has no active presence in territories considered to be tax havens / non-cooperative jurisdictions, in accordance with the applicable regulations in Spain⁸⁸, the stance of the European Union and the criteria of the OECD⁸⁹, as stated in the 'Declaration of presence in territories classified as tax havens / non-cooperative jurisdictions', published on Banco Sabadell's website⁹⁰.

Additionally, on an international scale, there are several non-governmental organisations, such as the Tax Justice Network, Oxfam Intermon, the Fair Tax Foundation and the Observatorio de Responsabilidad Social Corporativa, which have put together, according to their own criteria, lists of non-cooperative jurisdictions, and even lists that make reference to other additional concepts, such as tax dens (territories that have approved tax-related and legal frameworks that are thought to reduce the payment of taxes to the bare minimum) or tax niches (territories which, in certain circumstances, permit taxation that is considered to be extremely low, even though the usual taxation regime is normal).

As an additional exercise in transparency, and heeding the opinions and concerns expressed by the aforesaid organisations (that comprise one more of Banco Sabadell Group's stakeholder groups), the lists of territories identified by those organisations have been reviewed and the information in this regard has been included in the "Tax Responsibility and Good Practices" document⁹¹. In any case, the active presence in those territories is only ever due to business reasons (such as the banking activity carried out in the United Kingdom, Mexico and the United States) and, in the case of any presence where there is no activity with third parties, it is either irrelevant (Jersey) or entirely non-existent as the companies concerned have been liquidated (Bahamas and Andorra).



⁸⁵ Law 11/2021 of 9 July and Order HFP/115/2023 of 9 February determining countries and territories, as well as harmful fiscal regimes considered non-cooperative jurisdictions.

⁸⁶ List of non-cooperative countries and territories for tax purposes.

⁸⁷ List of territories that do not meet standards of transparency and exchange of information, neither in relation to the Automatic Exchange of Information (AEOI) nor in relation to the Exchange of Information on Request (EOIR).

⁸⁸ The Group has no active presence in Jersey through any subsidiary or permanent establishment, nor does it have any representative office in that territory. Its presence in Jersey is limited to a trust established in 2014 to manage and monitor long-term incentive plans established in connection with staff at TSB through the acquisition and delivery of shares to employees under the framework of those plans. Similarly, as can be seen in Schedule I to the consolidated annual financial statements for 2025, the presence in this territory is not material.

⁸⁹ The Bahamas territory was removed from "The EU list of non-cooperative jurisdictions for tax purposes" in February 2024, although the OECD considers it a non-compliant territory in its list "Automatic Exchange of Information". In any event, the Group does not have an active presence in that territory, as the subsidiary "Bahamas Bank & Trust Ltd." (a subsidiary incorporated into the Group as a result of the merger by absorption of Banco Atlántico in 2006) has now been liquidated, as indicated in Schedule I, in the section "Exclusions from the scope of consolidation" of the consolidated annual financial statements for 2025.

⁹⁰ The statement is available in the document "Tax Responsibility and Good Practices of Banco Sabadell Group", which can be accessed through Banco Sabadell website through the following link: [Tax Responsibility](#).

⁹¹ The following references were used: (i) "Identifying tax havens: characteristics and 2023 tax haven listing" by Fair Tax Foundation, (ii) "Corporate Tax Haven Index" and "Financial Secrecy Index 2025" by Tax Justice Network, taking the first 30 countries of each index as reference, (iii) "Desigualdad S.A., filial en España" report published by Oxfam Intermon in January 2024, and (iv) "La Información sobre Sostenibilidad en las empresas del IBEX 35, ejercicio 2023" by Observatorio de RSC. The document "Tax Responsibility and Good Practices of Banco Sabadell Group" is available on the corporate website at the following link: [Tax responsibility](#).

Breakdown of profit and tax information by country

Details of consolidated pre-tax profit in each country⁹², in addition to the corporate income tax paid and accrued, the effective tax rate and turnover, by country, are set out below⁹³.

	Consolidated pre-tax profit		Corporate income tax paid ⁹⁴		Corporate income tax accrued		Turnover		Effective tax rate	
Country	2025	2024	2025	2024	2025	2024	2025	2024	2025	2024
Spain	1,857,564	1,825,882	310,441	222,372	(639,549)	(509,860)	4,438,250	4,533,147	34.4 %	27.9 %
United Kingdom	441,672	400,486	112,921	84,162	(114,477)	(113,317)	1,341,793	1,289,825	25.9 %	28.3 %
Mexico	81,222	65,718	1,568	20,273	(13,582)	(6,489)	197,396	217,938	16.7 %	9.9 %
United States	179,337	173,396	52,551	33,350	(45,271)	(42,245)	252,711	242,888	25.2 %	24.4 %
France	31,726	39,212	7,931	12,479	(7,413)	(9,420)	36,583	37,994	23.4 %	24.0 %
Portugal	6,728	5,404	2,450	2,340	(2,439)	(2,289)	12,381	9,888	36.3 %	42.4 %
Morocco	2,945	4,047	2,260	1,475	(1,137)	(1,652)	4,886	5,677	38.6 %	40.8 %
Jersey	1	2	—	—	—	—	1	4	— %	— %
Andorra ⁹⁵	—	(16)	—	—	—	—	—	—	— %	— %
Luxembourg	(111)	(90)	—	—	—	—	12	—	— %	— %
Bahamas ⁹⁶	—	(142)	—	—	—	—	—	—	— %	— %
Total	2,601,084	2,513,899	490,122	376,451	(823,868)	(685,272)	6,284,013	6,337,361	31.7 %	27.3 %

Data in thousand euro.

The figure shown for corporate income tax paid is determined on a cash basis, meaning that it takes into account the amounts paid corresponding to this tax during the current year (which are mainly related to instalment payments and withholding taxes) and the amounts received (which are mainly related to tax refunds from previous years as a result of the submission of the final tax returns). The above is all based on the payment schedule and method to determine the payments on account, as established by the corresponding regulation applicable in each country. Where appropriate, payments/refunds derived from the tax proceedings carried out are also included.

The figure corresponding to corporate income tax accrued corresponds to the amount of accrued corporate income tax recognised in the consolidated income statement, according to the applicable accounting principles.

The two previous figures typically differ, as the first figure (corporate income tax paid) is determined on a cash basis and therefore depends, among other considerations, on the method of calculation and the schedule of payments on account established in the corresponding tax regulation of each country, the payments and refunds of the tax corresponding to other years, or the application of tax credits generated in previous years, whereas the second figure (corporate income tax

⁹² As for the countries and figures included in the table, certain differences may arise in relation to other information included in the annual financial statements, which is essentially the result of (i) entities being sold or acquired during the year, or (ii) profit or loss contributed by companies consolidated using the equity method.

⁹³ A breakdown of employees in each jurisdiction is included in "Schedule V – Annual banking report" of the Group's consolidated annual financial statements for 2025.

⁹⁴ The 310,441 thousand euros figure shown in the column "Corporate income tax paid" corresponding to 2025 and to Spain (222,372 thousand euros in 2024) comprises 579,707 thousand euros of payments made in relation to corporate income tax and the tax on net interest and commission income of certain financial institutions (IMIC) during 2025 (431,320 thousand euros in 2024) and 269,266 thousand euros of refunded amounts (208,947 thousand euros in 2024).

⁹⁵ Company liquidated.

⁹⁶ Company liquidated.

accrued) depends, essentially, on the profit and loss of the relevant year and any permanent adjustments established by the regulations specific to each jurisdiction (i.e. exemptions to preclude double taxation or non-deductibility of certain expenses).

The Group's effective tax rate, calculated as corporate income tax expense divided by pre-tax profit, was 31.67% and 27.26% in 2025 and 2024, respectively.

The differences between the current nominal rate in a given jurisdiction and the effective rate resulting from considering corporate income tax accrued and pre-tax profit are mainly due to adjustments made to taxable income taking into account the applicable regulations in each jurisdiction.

In this respect, it is worth noting that, in the case of the main jurisdictions in which the Group is present (Spain, United Kingdom and Mexico), a significant difference between the nominal tax rate and the effective tax rate is only observed in Mexico, where it is mainly due to a tax adjustment for inflation, in accordance with the applicable local regulations.

Global Tax Contribution

Banco Sabadell Group is aware that its tax contribution is an essential element of its commitment to economic development and sustainable growth in all the jurisdictions in which it operates.

For these purposes, in accordance with the principle of transparency, responsible taxation and good tax practices, Banco Sabadell Group voluntarily provides details, below, of its global tax contribution in 2025.

On occasion, the tax contribution analysis of multinational groups tends to focus on the corporate income tax burden in the different jurisdictions. However, without prejudice to the essential role this tax plays in the tax system, compliance with all tax obligations in the different jurisdictions in which the Group has a presence implies that the tax contribution to the public finance and, consequently, to society, is noticeably higher than that resulting from considering corporate income tax alone.

In addition, the Group companies also have an essential role in setting up the tax systems in those jurisdictions in which they are present, acting as collaborative partner entities of the public administrations, by managing their payments and collections, collaborating in the collection of taxes and complying with relevant tax-related disclosure obligations.

This broader and more comprehensive view of the tax contribution has been considered in some of the growing number of reporting and transparency initiatives, both at a national and international level⁹⁷, and aims to achieve a better understanding of the role of companies' contribution to the development of the societies in which they operate.

In this context, in addition to the information set out in the consolidated annual financial statements and in the information set out above⁹⁸, the information relating to the Group's global tax contribution,

⁹⁷ In this regard, (i) the Global Reporting Initiative's Taxation standard (GRI 207) contains a recommendation to include information regarding, amongst others, taxes collected on behalf of a tax authority, taxes withheld and paid on behalf of employees and industry-related taxes and other payments, (ii) the European Business Forum publishes annual 'Total Tax Contribution' reports prepared with the information of the largest companies headquartered in Europe, (iii) the Fundación Haz foundation has included, among the updated tax transparency indicators applicable from 2026, information on the total tax contribution, with a breakdown of taxes borne and collected, and (iv) the Fair Tax Foundation takes into account the information on total tax contribution in its Tax Responsibility and Transparency Index (TR&T).

⁹⁸ Note 39 – Tax situation (income tax relating to continuing operations) of the consolidated annual financial statements for 2025 includes a reconciliation between the Group's corporate income tax expense calculated by applying the general tax rate and the expense recognised for that tax, showing an effective tax rate (calculated as corporate income tax expense divided by pre-tax profit) of 31.67% and 27.26% in 2025 and 2024, respectively. In addition, the section headed "Breakdown of profit and tax information by country" includes the effective tax rate in each of the different jurisdictions.

prepared on a cash basis, includes a breakdown of the actual tax contribution element (own tax charges borne) and the contributory element related to setting up tax systems and tax management (collection of tax from third parties):

- The own tax charges borne are a cost for the Group, which reduce its bottom line, and represent a direct contribution to society. These include, among others, corporate income tax, tax on the net interest and commission income of certain financial institutions (*Impuesto sobre el margen de intereses y comisiones de determinadas entidades financieras*, or IMIC), non-recoverable input VAT, and specific taxes on the Group's financial activities (such as transfer tax and stamp duty, the tax on deposits of credit institutions (*Impuesto sobre los depósitos de las entidades de crédito*, or IDEC), etc.). Employer social security contributions payable by the company are also considered in this category, due to their mandatory nature and their importance within government tax revenues.
- Third-party tax charges collected by the Group are those which, resulting from the economic activity carried out, have been paid on behalf of third parties and therefore do not represent a direct cost, such as employment-related charges (e.g. withholdings from salaries and wages, social security contributions payable by the employee) net VAT collected, withholdings related to corporate income tax, etc.

In 2025, Banco Sabadell Group's global tax contribution amounted to 2,119 million euros, with 1,269 million euros corresponding to own tax charges borne by the Group and the remainder corresponding to third-party tax charges collected by the Group, in line with the following breakdown:

Banco Sabadell Group's total tax contribution in 2025 (thousand euros)		
Own tax charges borne	1,268,640	60 %
Third-party tax charges collected	850,767	40 %
Total	2,119,407	100 %

Tax charges are paid in all jurisdictions in which the Group is present, with Spain and the United Kingdom accounting for 97% of the Group's business:

Jurisdiction	Own tax charges borne			Third-party tax charges collected (3)	Global Tax Contribution	Percentage
	Income tax paid (1)	Other (2)	Total			
Spain	310,441	628,861	939,302	705,722	1,645,024	78 %
United Kingdom	112,921	132,309	245,230	97,264	342,494	16 %
Mexico	1,568	11,965	13,533	35,494	49,027	2 %
United States	52,551	2,380	54,931	7,007	61,938	3 %
France	7,931	2,065	9,996	882	10,878	1 %
Portugal	2,450	706	3,156	2,247	5,403	— %
Morocco	2,260	232	2,492	2,151	4,643	— %
Luxembourg	—	—	—	—	—	— %
Total	490,122	778,518	1,268,640	850,767	2,119,407	100 %

(1) The section above headed "Breakdown of profit and tax information by country" includes additional explanations concerning corporate income tax paid.

(2) The "Other" column under "Own tax charges borne" includes 281,287 thousand euros of non-recoverable input VAT; 267,976 thousand euros of employment-related charges; 110,625 thousand euros of stamp duty paid in relation to public deeds to set up loans with mortgage guarantee; and 118,631 thousand euros of other taxes (such as IDEC, property tax, etc.).

(3) The column "Third-party tax charges collected" includes 382,727 thousand euros of withholdings related to corporate income tax (including withholdings levied on income from movable capital); 378,593 thousand euros of employment-related charges; 80,119 thousand euros of net VAT paid to the tax authorities; and 9,329 thousand euros of other taxes.

Therefore, the Group's own tax charges borne in 2025 (1,268,640 thousand euros) represent 38% of the consolidated profit before such charges.

In addition, in jurisdictions such as Spain, the United Kingdom and Mexico, other contributions are made (such as contributions to deposit guarantee funds) which represent a cost of the financial activity carried out by the Group and have an impact on the economic and financial security of society, although they are not of a fiscal nature and are not considered as part of the global tax contribution⁹⁹.

Public subsidies received

In 2025, subsidies received in Spain in relation to training amounted to 833,025 euros.

⁹⁹ Information on the contributions made in Spain, the United Kingdom and Mexico is available in 'Note 32 – Other operating expenses' of the consolidated annual financial statements for 2025.



5. Annexes

5.1 Initiatives and alliances

In a cross-cutting way and in line with its commitment to sustainability and its objective of contributing to the Sustainable Development Goals (SDGs) and the Paris Agreement, Banco Sabadell continues to forge alliances with other sectors and is part of major international initiatives designed to fight climate change and improve social development.

Membership of these initiatives is organised around the Environmental, Social and Governance (ESG) pillars:

Global commitments

- Since 2005, Banco Sabadell has been a signatory of the United Nations Global Compact, undertaking to comply with Ten Principles on human rights, labour, the environment and anti-corruption.
- In 2019, the Institution adhered to the United Nations Principles for Responsible Banking, the first global framework that defines the role of the banking industry in the transition to a sustainable future, reinforcing the alignment with the SDGs and the Paris Agreement.

Climate action and Sustainable finance

- Since 2009, Banco Sabadell has been part of the Carbon Disclosure Project (CDP), reporting information on the risks and opportunities associated with climate change.
- In 2011, the Bank became a signatory of the Equator Principles, which incorporate social and environmental criteria in large-scale project finance and corporate loans.
- Since 2021, the Bank has been following the guidelines of the voluntary Net-Zero Banking Alliance (NZBA) framework, promoted by the United Nations Environment Programme Finance Initiative (UNEP FI), in order to attain emissions neutrality across its investment and lending portfolios by 2050.
- In 2022, it became a member of the Partnership for Carbon Accounting Financials (PCAF¹⁰⁰), in order to measure and disclose emissions financed through loans and investments in a standardised way.

¹⁰⁰ The Partnership for Carbon Accounting Financials is a collaboration between financial institutions from all over the world, launched in 2019 to measure and disclose, in a standardised format, emissions financed through loans and investments. PCAF member institutions work together to develop the Global GHG Accounting and Reporting Standard for the Financial Industry. More information can be found at <https://carbonaccountingfinancials.com/industries>.

Responsible investment

- Since 2012, pension fund manager BanSabadell Pensiones, EGFP S.A. and, since 2016, Aurica Capital, a venture capital enterprise that invests in Spanish companies with plans to expand in foreign markets, have adopted the United Nations Principles for Responsible Investment (PRI) in the investment manager category. It is worth noting that the UN PRI has awarded BanSabadell Pensiones the highest distinction – five stars – in investment strategy, governance and direct investment.
- BanSabadell Pensiones, EGFP S.A. (hereinafter, BSP) has individually subscribed the following funds to the UN PRI: BanSabadell Pentapensión Empresa FP, Fondo de Pensiones de los Empleados de Banco Sabadell MF2000, Fondo de Pensiones de los Empleados de Banco Sabadell GM, BanSabadell 18 FP, and Fondo de Pensiones de la Compañía de Servicios de Bebidas Refrescantes. It should also be noted that the UN PRI has awarded five stars to four pension funds managed by BSP, including the pension fund that the Banco Sabadell's Employee Pension Plan is part of.

National and sectoral alliances

- The Bank collaborates with multi-sector forums such as the Spanish Observatory of Sustainable Financing (Observatorio Español de la Financiación Sostenible, or OFISO).
- In addition, it promotes sustainability throughout its supply chain by participating in the third Training Programme: Sustainable Suppliers, developed by the UN Global Compact and its network in Spain, ICEX and the ICO Foundation.

On social aspects

The Bank renewed its commitments to financial education, workplace environments, diversity and gender through various social development initiatives in Spain:

- On one hand, at the institutional level, the Bank has renewed its membership of the agreement signed between the Spanish Banking Association (AEB), the Spanish Securities Market Commission (CNMV) and the Bank of Spain to pursue courses of action under the framework of the National Plan for Financial Education and, on the other hand, it was once again awarded the “Equality in the Workplace” seal of distinction by the Ministry of Equality, and has signed up to the *Plan MeCuida* initiative promoted by the Spanish government.
- In terms of diversity, the Bank is a signatory of the “CEOs supporting diversity” (*CEO por la diversidad*) initiative promoted by the Adecco Foundation and the CEOE, and has signed the General Protocol for “More Women, Better Companies” (*Protocolo General de Más Mujeres, Mejores Empresas*) promoted by the Women's Institute, which establishes the commitment to boost internal diversity. Additionally, it is a member of the Business Network Association for LGBTI Diversity and Inclusion (REDI by its Spanish acronym), which works to promote safe and respectful workplace environments. It has also signed up to the Empowering Women's Talent initiative launched by Equipos&Talento, which focuses on the empowerment of women in companies, and it is also a member of Women in Banking (WIB), an initiative dedicated to promoting the role of women in Spanish banking. The Institution also forms part of the Commission for Women in Banking, an AEB initiative, aligned with the aim of increasing the visibility and recognition of the role of women in the banking industry, as well as promoting inclusion and diversity in decision-making processes.

Accolades

- The Bank was singled out in the list of the 25 best companies to work for in Spain, according to the Top LinkedIn Companies ranking. This ranking, which includes companies with more than 5,000 employees, is based on criteria such as professional development, job stability and diversity.
- It also obtained the Top Employers in Spain certification granted by the Top Employers Institute, and is part of the top 100 places to work in Spain, according to the employer monitor Merco Talento España. In addition, REDI and the magazine *Actualidad Económica* have ranked the Bank among the 25 most inclusive Spanish companies in the 'Top LGBTI+ Leaders 2025', recognising its commitment to creating safer, diverse and inclusive workplaces for the LGBTI+ community.
- In the area of talent, diversity and inclusion, the Bank has been recognised as 'Best Company for All Talent' by Equipos&Talento, highlighting its commitment to an inclusive culture that promotes talent development, wellbeing and innovation. The Institution also received a special distinction for innovation in attracting and mobilising talent for the Talent Partnership 360° project, awarded by ManpowerGroup during the 'The Exchange' forum, an event focused on the future of work in the context of artificial intelligence.

On governance aspects

- The Bank is a signatory of the Code of Good Banking Practice and the Code of Good Taxation Practice, and publishes the Annual Tax Transparency Report. It is also a member of the advertising self-regulatory body Autocontrol (Asociación para la Autorregulación de la Comunicación Comercial) and has obtained the certification of transparency and fiscal accountability ("t for transparent" label), receiving the highest distinction awarded by Fundación Haz.
- Moreover, Banco Sabadell's corporate crime risk and anti-corruption management and organisation model has been certified by AENOR CONFÍA, S.A.U. under the Spanish standard UNE 19601 for criminal compliance management systems and under the international standard ISO 37001 for anti-bribery management systems.

Facilities and events certifications

- In relation to infrastructure and facilities, five of the Bank's corporate buildings hold the ISO 14001 certification.
- The Annual General Meeting of 20 March 2025 and the two Extraordinary General Meetings of 6 August 2025 received the "Sustainable Event" certification from Econep Consultores, S.L. (Eventsost), having been deemed compliant with sustainability criteria throughout the event life cycle.

International footprint

- TSB, the Group's leading brand in the United Kingdom, reaffirms its commitment to responsible management through its involvement in various noteworthy initiatives. These include its membership of the Good Business Charter, which recognises ethical business practices, and its membership of the Prince's Responsible Business Network, a Business In The Community (BITC) initiative that helps companies in the fight against environmental and social challenges. The entity is also committed to fair payment practices as a member of the Prompt Payment Code and supports mortgage customers through its membership of HM Treasury's Mortgage Charter.
- In Mexico, the Group operates under the Banco Sabadell Mexico brand name. The entity has been a signatory of the Sustainability Protocol¹⁰¹ for the Mexican banking sector, promoted by the Association of Mexican Banks (Asociación de Bancos de México, or ABM) since 2016. This protocol was updated to version 2.0 in 2025. This update modifies the commitment undertaken by Banco Sabadell, which reaffirmed its support for the Banking Sustainability Protocol 2.0 to include new Environmental, Social and Governance (ESG) principles. Banco Sabadell Mexico has been a signatory of the "Declaration in favour of the development of environmental, green and sustainable finance in the Mexican banking sector", promoted by the Green Finance Advisory Council (Consejo Consultivo de Finanzas Verdes, or CCFV) and the Association of Mexican Banks (Asociación de Bancos de México, or ABM) since 2022. It is also a member of the Sustainability Committee of the Spanish Chamber of Commerce (Comisión de Sostenibilidad de la Cámara Española de Comercio, or CAMESCOM) in Mexico. As part of CAMESCOM's activities in Mexico, Banco Sabadell Mexico was selected as the winner of the 2025 edition of the "*Reconocimiento de Sostenibilidad*" sustainability award, which promotes and recognises the commitment of its member companies to the environment and sustainable development.

ESG indices, ratings and distinctions

- The Bank is listed on the main international best-in-class indices for which it qualifies, such as IBEX ESG and FTSE4Good IBEX.
- Banco Sabadell achieved positive scores in leading ESG ratings, namely Sustainalytics, MSCI, ISS ESG and S&P Best In Class World Index.
- Notable accolades include being featured in *Time* magazine's ranking of the most sustainable companies.
- Furthermore, the Bank has been included in the ESG Ranking of *elEconomista.es*, placing among the Top 10 IBEX 35 companies in sustainability.

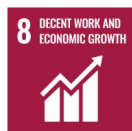
¹⁰¹ The Sustainability Protocol for the Mexican banking sector, promoted by the Association of Mexican Banks (Asociación de Bancos de México, or ABM), is a voluntary agreement between financial institutions, including commercial banks, development banks and development agencies. Its version 2.0, updated in 2025, incorporates ESG criteria aligned with national and international standards. This initiative serves as a key tool for financial undertakings to embed these criteria into their business strategies, helping to mitigate risks and address challenges related to climate change. The document (in Spanish) can be found at: [Banking Sustainability Protocol](#).

Alignment with the SDGs

These alliances, which are all embedded in the ESG framework of Sabadell's Commitment to Sustainability, are additional to the Group's transformation and promotion actions, both those already carried out and those planned for the future, which are aligned with the Sustainable Development Goals (SDGs) that the Institution has greater capacity to influence due to its systemic interconnectedness, its activity and its capacity to make an impact. In this respect, although the Institution's goal requires it to contribute to all SDGs, the following have been prioritised:



Affordable and clean energy.



Decent work and economic growth.



Industry, innovation and infrastructure.



Climate action.



Peace, justice and strong institutions.

5.2 Principles for Responsible Banking: Responsible Banking Progress Statement

Principle 1 Alignment	Principle 2 Impact & Target Setting	Principle 3 Clients & Customers
Banco Sabadell aligns its strategy with the Sustainable Development Goals (SDGs) and the Paris Agreement, in order to support and accelerate the important economic and social transformations that contribute to sustainable development and the fight against climate change. In that regard, in 2022, the Group published “Sabadell’s Commitment to Sustainability”, an action framework that integrates a forward-looking vision in relation to environmental, social and governance commitments, aligns business objectives with the SDGs and establishes action levers to generate transformation and promotion activities. It should be noted that the Bank is working toward the definition of new long-term objectives and targets, to be communicated in 2026. In addition, Banco Sabadell continues to move ahead with its Decarbonisation Strategy, whilst at the same time moving closer to achieving global climate targets, as it is a signatory of the Collective Commitment to Climate Action (CCCA) and it is aligned with the voluntary framework of the Net-Zero Banking Alliance (NZBA), in order to attain emissions neutrality in its investment and lending portfolios by 2050. In 2021, Banco Sabadell Group joined the Net-Zero Banking Alliance (NZBA), undertaking to align its lending and investment portfolios with net-zero emissions of greenhouse gases (GHGs) by 2050 at the latest, in line with the targets of the Paris Agreement. After the NZBA changed into a voluntary reference framework in 2025, Banco Sabadell maintains its commitments and follows the recommendations of the NZBA in order to foster the transition of its customers. Additionally, it is worth noting that, in a cross-cutting way and in line with its commitment to sustainability, Banco Sabadell continues to forge alliances with other sectors and is part of major international initiatives designed to fight climate change and improve social development.	Banco Sabadell carries out, on a recurring basis, an analysis to identify the positive and negative impacts arising from its financing activities, in line with the requirements of the Principles for Responsible Banking of the United Nations Environment Programme Finance Initiative (UNEP FI). This analysis is conducted using the Portfolio Impact Analysis for Banks tool for the application of the Holistic Impact Methodology devised by UNEP FI. In the most recent update to this analysis, it was concluded that the most prominent areas of impact on the portfolio continue to be “Availability, accessibility, affordability and quality of resources and services” (in particular, “Access to finance and housing”) and “Climate stability”, given that the Institution’s business model has not changed significantly. In response to the requirements of the CSRD, a double materiality analysis was carried out, in which the results obtained from the Impact Analysis Tool for Banks were taken into account. The Bank has defined specific targets and objectives related to the most prominent impact areas, which are regularly monitored. In addition, it should be noted that the Bank is working toward the definition of new long-term objectives and targets, to be communicated in 2026.	Banco Sabadell established “Sabadell’s Commitment to Sustainability” as an ESG framework, in which one of the main courses of action is to support customers in the transition to a sustainable economy, laying down decarbonisation pathways, helping customers in the transition with specialised solutions for renewable energy, energy efficiency and sustainable mobility, and defining sectoral rules that limit controversial activities and/or activities with negative impacts on environmental and social development. To deliver on this commitment, the Bank is taking further action to raise awareness and offer advice across all sectors of the business fabric, offering solutions to finance the investments required for this transition. These activities include sustainable financing solutions and specialist advice. The Group promotes sustainable financing and investment to drive forward the transition towards a more sustainable model and a low-carbon economy, offering customers and investors the best possible solutions. Therefore, as part of “Sabadell’s Commitment to Sustainability”, the Bank undertook to mobilise a cumulative total of €65bn of financial products and services in sustainable finance solutions during the 2021-2025 period. The Bank mobilised over €76bn over the 2021-2025 period, surpassing the established target by more than 17%. In the area of social loans, it is worth highlighting those granted to micro-enterprises for the purpose of promoting and maintaining employment. The Bank has granted financing to SMEs and micro-enterprises, mainly through loans and credit facilities, thereby supporting job retention and fostering the development and growth of the business and industrial fabric across each region, totalling more than 13.2 billion euros between 2021 and 2025.

Principle 1 Alignment	Principle 2 Impact & Target Setting	Principle 3 Clients & Customers
Links and references — Banco Sabadell's Commitment to Sustainability — Sustainability Report for the year ended 31 December 2025: 1. General information 1.2 Double materiality analysis 1.3 Governance 1.3.1 Sustainability governance 1.3.2 Integration of sustainability-related performance in incentive schemes 1.3.3 Framework of policies, principles and declarations in the area of sustainability 1.3.4 Due diligence procedures in relation to human rights 1.4 Sustainability strategy and business model 2. Environmental information 2.1 Climate change 2.1.1 Transition plan for climate change mitigation 2.1.2 Managing and monitoring the risks associated with climate change 2.1.3 Energy consumption and carbon footprint 3. Social information 3.2 Consumers and end-users 3.2.2 Information transparency 3.2.3 Data protection 3.2.4 Cybersecurity 5. Annexes 5.1 Initiatives and alliances 5.4 Equator Principles	Links and references — Sustainability Report for the year ended 31 December 2025: 1. General information 1.2 Double materiality analysis 1.3 Governance 1.3.4 Due diligence procedures in relation to human rights 1.4 Sustainability strategy and business model 2. Environmental information 2.1 Climate change 2.1.1 Transition plan for climate change mitigation 2.1.2 Managing and monitoring the risks associated with climate change 2.1.3 Energy consumption and carbon footprint 3. Social information 3.2 Consumers and end-users 3.2.5 Financial inclusion and access to products and services	Links and references — Sustainability Report for the year ended 31 December 2025: 1. General information 1.2 Double materiality analysis 1.3 Governance 1.3.3 Framework of policies, principles and declarations in the area of sustainability 1.4 Sustainability strategy and business model 1.4.2 Sustainable financing solutions for Business Banking 1.4.3 Sustainable financing solutions for Retail Banking 1.4.4 Sustainable savings and responsible investment solutions 1.4.6 Sinia Renovables 2. Environmental information 2.1 Climate change 2.1.1 Transition plan for climate change mitigation 2.1.2 Managing and monitoring the risks associated with climate change 2.1.3 Energy consumption and carbon footprint 3. Social information 3.2 Consumers and end-users 3.2.1 Customer experience and customer care 3.2.2 Information transparency 3.2.3 Data protection 3.2.4 Cybersecurity 3.2.5 Financial inclusion and access to products and services 3.2.5.1 Vulnerable customers 3.2.5.2 Sogeviso 3.2.5.3 Code of Good Practice

Principle 4 Stakeholders

Banco Sabadell remains committed to its main stakeholders. To that end, it involves the main stakeholder groups and collaborates with them.

The Group, in keeping with its commitment, has been conducting materiality assessments of topics related to sustainability, aligning with best practice in relation to sustainability and transparency. With the entry into force of the new European Corporate Sustainability Reporting Directive (CSRD), a double materiality exercise was carried out in order to identify the material impacts, risks and opportunities related to sustainability. As part of this process, the Bank's main stakeholder groups were identified by reviewing previous exercises, analysing recommendations included in the CSRD, and analysing peer group entities. The main stakeholders identified are the financial community (investors, shareholders and rating agencies), employees, suppliers, customers, organisations and institutions, society and peers. Once identified, channels to listen to what they had to say were determined.

During 2025, the double materiality analysis conducted in 2024 was updated. This update focused on reassessing certain impacts, risks and opportunities arising from changes in the public documents consulted to evaluate the opinions of stakeholder groups, with particular emphasis on sustainability reports published by "first-wave" entities subject to the CSRD.

It is important to highlight that, in the jurisdictions in which it operates, Banco Sabadell conducts internal assessments of the alignment of the positions and advocacy activities of the organisations with which it collaborates with the targets of the Paris Agreement and the Bank's other core values. Where misalignment is identified, appropriate mitigating measures are defined and implemented.

Principle 5 Governance & Culture

The governance system and the organisation of the different decision-making levels are both being continuously improved and adapted to the needs that are emerging from the new sustainability environment.

The remuneration policy and practices integrate sustainability risks, encouraging behaviour consistent with the Group's risk-based approaches related to climate and the environment, as well as with the commitments voluntarily undertaken by the Group.

The Bank continues to support workers in sustainability training, focusing on environmental management, the energy crisis and other content to provide continuous training on sustainability.

Principle 6 Transparency & Accountability

The references included in the Responsible Banking Progress Statement are part of the Group's Sustainability Report, which underwent limited independent third-party verification.

As part of its adherence to the Principles for Responsible Banking and in line with the commitments undertaken under the UNEP FI, the Institution has incorporated the recommendations received to further strengthen the integration of the PRB into its strategy, governance and internal processes. During 2025, the Institution made steady progress in the areas identified by the UNEP FI, among others, by advancing its sectoral decarbonisation targets and integrating its human rights commitments into its internal processes.

Principle 4 Stakeholders	Principle 5 Governance & Culture	Principle 6 Transparency & Accountability
Links and references — Sustainability Report for the year ended 31 December 2025: 1. General information 1.2 Double materiality analysis 3. Social information 3.1 Own workforce 3.2 Consumers and end-users — Institutional commitments and accolades	Links and references — Sustainability Report for the year ended 31 December 2025: 1. General information 1.3 Governance 1.3.1. Sustainability governance 1.3.2 Integration of sustainability-related performance in incentive schemes 1.3.3 Framework of policies, principles and declarations in the area of sustainability 1.3.4 Due diligence procedures in relation to human rights 2. Environmental information 2.1 Climate change 3. Social information 3.1 Own workforce 3.1.3 Training 4. Governance information	Links and references — Sustainability Report for the year ended 31 December 2025: Audit Report

5.3 Equator Principles

Since 2011, the Group has adhered to the Equator Principles, an international voluntary framework of policies, standards and guidelines which aims to identify, assess and manage environmental and social risks relating to project finance of 10 million US dollars or more and corporate loans related to projects of more than 50 million US dollars. Through the standards of the Equator Principles, a social and environmental assessment of the potential impacts of the project is carried out by an independent expert.

During 2025, a total of 15 new structured finance projects incorporating the Equator Principles were signed, 73.3% of which are renewable energy projects.

Sector	Number of projects	Category	Country	Region	Designated country	Independent review
Renewable energies	7	B	Spain	Europe	Yes	Yes
Renewable energies	4	B	USA	Americas	Yes	Yes
Infrastructure	2	C	USA	Americas	Yes	Yes
Infrastructure	1	B	UK	Europe	Yes	Yes
Commercial Real Estate	1	B	Mexico	Americas	No	Yes



5.4 List of disclosure requirements fulfilled

The table of contents of the information required pursuant to Law 11/2018 of 28 December on non-financial and diversity disclosures, together with its reporting framework, is set out below.

		Reporting framework	Page
General disclosures			
Business model	Description of the business model:	BP-1 and BP-2	170
	— Business environment	GOV-1	195
	— Organisation and structure	GOV-3	206
	— Markets in which it operates	SBM-1	221
	— Objectives and strategy	SBM-2	171
	— Key factors and trends that could affect its future performance	SBM-3	171
		IRO-1 and IRO-2	171
		ESRS 2 GOV-3	206
	— Main policies applied by the Group	ESRS 2 IRO-1	171
		E1-2	209
		E1-3	361
		E1-4	406
		ESRS 2 SBM-2	171
		ESRS 2 SBM-3	171
		S1-1	209
		S1-2	417
		S1-3	417
		S1-4	417
		S1-5	417
		S4-1	209
		S4-2	454
		S4-3	454
		S4-4	454
		S4-5	454
		ESRS 2 GOV-1	195
		G1-1	482
Main risks and impacts identified	Internal Control and Risk Management System	GOV-5	219
	Analysis of risks and impacts related to key matters	ESRS 2 IRO-1	171
		S1-4	417
		S4-4	454
		G1-3	485

Environmental matters

Environmental management	Detailed information about the current and foreseeable effects of the company's activities on the environment and, where applicable, on health and safety	SBM-3	171
		IRO-1; IRO-2 and SBM-3	171
		ESRS 2 IRO-1	171
	Environmental assessment or certification procedures	E1-1	362
		E1-3	406
	Resources dedicated to environmental risk prevention	GOV-1	195
		GOV-2	195
		E1-1	362
		E1-3	406
	Application of the precautionary principle	ESRS 2 IRO-1	171
		E1-2	209
		E1-3	406
	Amount of provisions and guarantees for environmental risks	ESRS 2 IRO-1	171
Pollution	Measures to prevent, reduce or offset carbon emissions that severely affect the environment, taking into account any form of atmospheric pollution caused by a specific activity, including noise and light pollution	Non-material	
Circular economy and waste prevention and management	Measures on the prevention, recycling, reuse and other forms of recovery and disposal of waste	E1-3	406
	Actions to combat food waste	Non-material	
Sustainable use of resources	Water consumption and water supply in accordance with local restrictions	E1-3	406
		E1-6	406
	Consumption of raw materials and measures adopted to make their use more efficient	E1-3	406
		E1-6	406
	Direct and indirect energy consumption	E1-3	406
		E1-5	406
		E1-6	406
	Measures taken to improve energy efficiency	E1-3	406
		E1-5	406
	Use of renewable energies	E1-3	406
		E1-5	406
Climate change	Greenhouse gas emissions generated as a result of the company's activities, including the use of the goods it produces and the services it provides	E1-3	406
		E1-6	406
	Measures taken to adapt to the consequences of climate change	E1-3	406
	Voluntary reduction targets established for the medium and long term to reduce greenhouse gas emissions and the measures implemented for such purposes	E1-4	406
Protection of biodiversity	Measures taken to preserve or restore biodiversity	Non-material	
	Impacts caused by activities or operations in protected areas	Non-material	

Corporate and staff-related matters

Employment	Total number and breakdown of employees by country, sex, age and professional category	S1-6	418
	Total number and breakdown of types of employment contract	S1-6	418
	Annual average by type of contract (permanent, temporary or part-time) and by sex, age and professional category	S1-6	418
	Number and breakdown of dismissals by sex, age and professional category	S1-6	418
	Average remuneration and its evolution, broken down by sex, age and professional category or categories of equivalent value	S1-16	437
	Average remuneration of directors and senior managers, including variable pay, subsistence allowances, severance pay, payments into long-term retirement plans or any other amounts received, broken down by sex	S1-16	437
	Pay gap	S1-3	437
		S1-16	437
	Implementation of policies safeguarding employees' right to disconnect	S1-4	446
	Employees with disabilities	S1-12	445
	Total remuneration ratio	S1-16, DP 97b	
Organisation of the work	Organisation of working hours	S1-4	446
	Number of hours of employee absence	S1-14	447
	Measures aimed at facilitating the achievement of a work-life balance and encouraging the equal enjoyment of such measures by both parents	S1-4	446
Health and safety	Health and safety conditions in the workplace	S1-14	447
	Number of work-related accidents and work-related ill health, broken down by gender, and frequency and severity rates by gender	S1-14	447
Workplace relations	Organisation of social dialogue, including procedures for informing and consulting with staff and for negotiating with them	S1-2	452
	Percentage of employees covered by a collective bargaining agreement, by country	S1-8	450
	Status of collective bargaining agreements, particularly in relation to occupational health and safety	S1-2	450
	Mechanisms and procedures that the company has in place to promote the involvement of employees in the company's management in terms of information, consultation and participation	S1-2	450
		S1-3	450
Training	Policies implemented in relation to training	S1-4	428
	Total hours of training, broken down by professional category	S1-13	428
Accessibility	Integration and universal accessibility for people with disabilities	S1-12	431
Equality	Measures adopted to promote equal treatment and opportunities between women and men	S1-3	431
		S1-4	423
	Equality Plans (Chapter III of Organic Law 3/2007 of 22 March on effective equality between women and men)	S1-1	431
	Measures adopted to promote employment, protocols against sexual and sex-based harassment	S1-3	431
		S1-4	423
	Policy against all forms of discrimination and, where applicable, diversity management	S1-1	431
		S1-4	423

Disclosures on respecting human rights

Human rights	Application of due diligence procedures in relation to human rights, prevention of risks of human rights violations and, where applicable, measures to mitigate, manage and redress any such violations	S4-1	217
	Reported human rights violations	S4-4	217
		G1-1	217
	Advocacy of, and compliance with, the provisions of fundamental conventions of the International Labour Organization related to safeguarding the freedom of association and the right to collective bargaining, elimination of workplace discrimination and job discrimination, elimination of forced or compulsory labour, effective abolition of child labour	S4-1	217

Information regarding the fight against corruption and bribery

Corruption and bribery	Measures adopted to prevent corruption and bribery	G1-3	485
	Measures to combat money laundering	G1-1	487
	Contributions to foundations and non-profit organisations	G1-3	485

Information regarding society

The company's commitments to sustainable development	Impact of the company's activities on local employment and development	ESRS 2 SBM-3	171
		S4-4	454
	Impact of the company's activities on local communities and in the area	ESRS 2 SBM-3	171
		S4-4	454
	Relationships with key members of local communities and the different forms of dialogue with the same	ESRS 2 SBM-3	171
Outsourcing and suppliers	Association and sponsorship activities	S4-4	454
		Non-material	
	Inclusion in the procurement policy of social, gender equality and environmental matters	G1-2	492
	Consideration in relationships with suppliers and subcontractors of their social and environmental responsibilities	G1-2	492
	Supervision and audit systems and their results	G1-2	492
Consumers	Consumer health and safety measures	G1-2	492
	Grievance systems, complaints received and their resolution	S4-1	454
Tax information		S4-3	455
	Country-by-country earnings obtained	GRI 207-4 (in relation to profits and taxes)	498
	Corporate income tax paid		
	Public subsidies received		

Regulation (EU) 2020/852 - Taxonomy

Requirements of the Regulation	Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)	240
	Taxonomy indicators	248

5.5 Table of datapoints associated with other European regulations

List of datapoints in cross-cutting and topical standards that derive from EU legislation other than the CSRD and the ESRS.

Disclosure requirement and related datapoint	Description	Section	SFDR ¹⁰²	Pillar 3 ¹⁰³	Benchmarks Regulation ¹⁰⁴	European Climate Law ¹⁰⁵
ESRS 2 GOV-1	Board's gender diversity, paragraph 21 (d)	1.3.1. Sustainability governance	x		x	
ESRS 2 GOV-1	Percentage of Board members who are independent, paragraph 21 (e)	1.3.1. Sustainability governance			x	
ESRS 2 GOV-4	Statement on due diligence, paragraph 30	1.3.4 Due diligence procedures in relation to human rights	x			
ESRS 2 SBM-1	Involvement in activities related to fossil fuels, paragraph 40 (d) (i)	1.4 Sustainability strategy and business model	x	x	x	
ESRS 2 SBM-1	Involvement in activities related to chemicals production, paragraph 40 (d) (ii)	1.4 Sustainability strategy and business model	x		x	
ESRS 2 SBM-1	Involvement in activities related to controversial weapons, paragraph 40 (d) (iii)	1.4 Sustainability strategy and business model	x		x	
ESRS 2 SBM-1	Involvement in activities related to cultivation and production of tobacco, paragraph 40 (d) (iv)	1.4 Sustainability strategy and business model			x	
ESRS E1-1	Transition plan to reach climate neutrality by 2050, paragraph 14	2.1.1 Transition plan for climate change mitigation				x
ESRS E1-1	Undertakings excluded from Paris-aligned Benchmarks, paragraph 16 (g)	2.1.1 Transition plan for climate change mitigation		x	x	
ESRS E1-4	GHG emission reduction targets, paragraph 34	2.1.1 Transition plan for climate change mitigation 2.1.3 Energy consumption and carbon footprint	x	x	x	
ESRS E1-5	Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors), paragraph 38	2.1.3 Energy consumption and carbon footprint	x			
ESRS E1-5	Energy consumption and mix, paragraph 37	2.1.3 Energy consumption and carbon footprint	x			
ESRS E1-5	Energy intensity associated with activities in high climate impact sectors, paragraphs 40 to 43	2.1.3 Energy consumption and carbon footprint	x			
ESRS E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions, paragraph 44	2.1.3 Energy consumption and carbon footprint	x	x	x	

¹⁰² Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (OJ L 317, 9.12.2019, p. 1).

¹⁰³ Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012 (Capital Requirements Regulation, or CRR) (OJ L 176 27.6.2013, p. 1).

¹⁰⁴ Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds and amending Directives 2008/48/EC and 2014/17/EU and Regulation (EU) No 596/2014 (OJ L 171, 29.6.2016, p. 1).

¹⁰⁵ Regulation (EU) 2021/1119 of the European Parliament and of the Council of 30 June 2021 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 ("European Climate Law") (OJ L 243, 9.7.2021, p. 1).

Disclosure requirement and related datapoint	Description	Section	SFDR ¹⁰²	Pillar 3 ¹⁰³	Benchmarks Regulation ¹⁰⁴	European Climate Law ¹⁰⁵
ESRS E1-6	Gross GHG emissions intensity, paragraphs 53 to 55	2.1.3 Energy consumption and carbon footprint	x	x	x	
ESRS E1-7	GHG removals and carbon credits, paragraph 56	2.1.1 Transition plan for climate change mitigation				x
ESRS E1-9	Exposure of the benchmark portfolio to climate-related physical risks, paragraph 66	Information not required for 2025			x	
ESRS E1-9	Disaggregation of monetary amounts by acute and chronic physical risk, paragraph 66 (a) Location of significant assets at material physical risk, paragraph 66 (c)	Information not required for 2025		x		
ESRS E1-9	Breakdown of the carrying value of its real estate assets by energy-efficiency classes, paragraph 67 (c)	Information not required for 2025		x		
ESRS E1-9	Degree of exposure of the portfolio to climate-related opportunities, paragraph 69	Information not required for 2025			x	
ESRS E2-4	Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Non-material	x			
ESRS E3-1	Water and marine resources, paragraph 9	Non-material	x			
ESRS E3-1	Dedicated policy, paragraph 13	Non-material	x			
ESRS E3-1	Sustainable oceans and seas, paragraph 14	Non-material	x			
ESRS E3-4	Total water recycled and reused, paragraph 28 (c)	Non-material	x			
ESRS E3-4	Total water consumption in m ³ per net revenue on own operations, paragraph 29	Non-material	x			
ESRS 2 - IRO 1 - E4	paragraph 16 (a) (i)	Non-material	x			
ESRS 2 - IRO 1 - E4	paragraph 16 (b)	Non-material	x			
ESRS 2 - IRO 1 - E4	paragraph 16 (c)	Non-material	x			
ESRS E4-2	Sustainable land / agriculture practices or policies, paragraph 24 (b)	Non-material	x			
ESRS E4-2	Sustainable oceans / seas practices or policies, paragraph 24 (c)	Non-material	x			
ESRS E4-2	Policies to address deforestation, paragraph 24 (d)	Non-material	x			
ESRS E5-5	Non-recycled waste, paragraph 37 (d)	Non-material	x			
ESRS E5-5	Hazardous waste and radioactive waste, paragraph 39	Non-material	x			
ESRS 2 - SBM3 - S1	Risk of incidents of forced labour, paragraph 14 (f)	1.3.4 Due diligence procedures in relation to human rights	x			
ESRS 2 - SBM3 - S1	Risk of incidents of child labour, paragraph 14 (g)	1.3.4 Due diligence procedures in relation to human rights	x			
ESRS S1-1	Human rights policy commitments, paragraph 20	1.3.4 Due diligence procedures in relation to human rights	x			
ESRS S1-1	Due diligence policies on issues addressed by the fundamental International Labour Organization Conventions 1 to 8, paragraph 21	1.3.4 Due diligence procedures in relation to human rights			x	
ESRS S1-1	Processes and measures for preventing trafficking in human beings, paragraph 22	1.3.4 Due diligence procedures in relation to human rights	x			

Disclosure requirement and related datapoint	Description	Section	SFDR ¹⁰²	Pillar 3 ¹⁰³	Benchmarks Regulation ¹⁰⁴	European Climate Law ¹⁰⁵
ESRS S1-1	Workplace accident prevention policy or management system, paragraph 23	3.1.6.2 Health and safety	x			
ESRS S1-3	Grievance/complaints handling mechanisms, paragraph 32 (c)	3.1.7 Dialogue with employees	x			
ESRS S1-14	Number of fatalities and number and rate of work-related accidents, paragraph 88 (b) and (c)	3.1.6.2 Health and safety	x		x	
ESRS S1-14	Number of days lost to injuries, accidents, fatalities or illness, paragraph 88 (e)	3.1.6.2 Health and safety	x			
ESRS S1-16	Unadjusted gender pay gap, paragraph 97 (a)	3.1.5 Remuneration policy	x		x	
ESRS S1-16	Excessive CEO pay ratio, paragraph 97 (b)	3.1.5 Remuneration policy	x			
ESRS S1-17	Incidents of discrimination, paragraph 103 (a)	1.3.4 Due diligence procedures in relation to human rights	x			
ESRS S1-17	Non-respect of UNGPs on Business and Human Rights and OECD, paragraph 104 (a)	1.3.4 Due diligence procedures in relation to human rights	x		x	
ESRS 2 - SBM3 - S2	Significant risk of child labour or forced labour in the value chain, paragraph 11 (b)	Non-material	x			
ESRS S2-1	Human rights policy commitments, paragraph 17	Non-material	x			
ESRS S2-1	Policies related to value chain workers, paragraph 18	Non-material	x			
ESRS S1-1	Non-respect of UNGPs on Business and Human Rights and OECD guidelines, paragraph 19	Non-material	x		x	
ESRS S2-1	Due diligence policies on issues addressed by the fundamental International Labour Organization Conventions 1 to 8, paragraph 19	Non-material			x	
ESRS S2-4	Human rights issues and incidents connected to its upstream and downstream value chain, paragraph 36	Non-material	x			
ESRS S3-1	Human rights policy commitments, paragraph 16	Non-material	x			
ESRS S3-1	Non-respect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines, paragraph 17	Non-material	x		x	
ESRS S3-4	Human rights issues and incidents, paragraph 36	Non-material	x			
ESRS S4-1	Policies related to consumers and end-users, paragraph 16	1.3.3 Framework of policies, principles and declarations in the area of sustainability 1.3.4 Due diligence procedures in relation to human rights 3.2.2 Information transparency	x			
ESRS S4-1	Non-respect of UNGPs on Business and Human Rights and OECD guidelines, paragraph 17	1.3.4 Due diligence procedures in relation to human rights	x		x	
ESRS S4-4	Human rights issues and incidents, paragraph 35	1.3.4 Due diligence procedures in relation to human rights	x			
ESRS G1-1	United Nations Convention against Corruption, paragraph 10 (b)	4.1.2 Corruption and bribery	x			
ESRS G1-1	Protection of whistleblowers, paragraph 10 (d)	4.1.2 Corruption and bribery	x			
ESRS G1-4	Fines for violation of anti-corruption and anti-bribery laws, paragraph 24 (a)	4.1.2 Corruption and bribery	x		x	
ESRS G1-4	Standards of anti-corruption and anti-bribery, paragraph 24 (b)	4.1.2 Corruption and bribery	x			

5.6 Correlation table with the CSRD

Material disclosure requirement			Section
ESRS 2: General information			
Basis for preparation	BP-1	General basis for preparation of the sustainability statement	1.1 Introduction
	BP-2	Disclosures in relation to specific circumstances	1.1 Introduction
Governance	GOV-1	The role of the administrative, management and supervisory bodies	1.3.1. Sustainability governance
	GOV-2	Information provided to the administrative, management and supervisory bodies	1.3.1. Sustainability governance
	GOV-3	Integration of sustainability-related performance in incentive schemes	1.3.2 Integration of sustainability-related performance in incentive schemes
	GOV-4	Statement on due diligence	1.3.4 Due diligence procedures in relation to human rights
	GOV-5	Risk management and internal controls over sustainability reporting	1.3.5 Risk management and internal controls over sustainability reporting
Strategy	SBM-1	Strategy, business model and value chain	1.4 Sustainability strategy and business model
	SBM-2	Interests and views of stakeholders	1.2 Double materiality analysis
	SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	1.2 Double materiality analysis
Impacts, risks and opportunities management	IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	1.2 Double materiality analysis
	IRO-2	Disclosure requirements in ESRS covered by the undertaking's sustainability statements	1.2 Double materiality analysis

Minimum disclosure requirement	MDR-P	Policies adopted to manage material sustainability matters	1.3.3 Framework of policies, principles and declarations in the area of sustainability 2.1 Climate change 3.1 Own workforce 3.2 Consumers and end-users 4.1 Business conduct 4.3 Tax responsibility
	MDR-A	Actions and resources in relation to material sustainability matters	2.1 Climate change 3.1 Own workforce 3.2 Consumers and end-users 4.1 Business conduct 4.3 Tax responsibility
	MDR-M	Metrics in relation to material sustainability matters	2.1 Climate change 3.1 Own workforce 3.2 Consumers and end-users 4.1 Business conduct 4.3 Tax responsibility
	MDR-T	Tracking effectiveness of policies and actions through targets	2.1 Climate change 3.1 Own workforce 3.2 Consumers and end-users 4.1 Business conduct 4.3 Tax responsibility
ESRS E1: Climate change			
Governance	ESRS 2 GOV-3	Integration of sustainability-related performance in incentive schemes	1.3.2 Integration of sustainability-related performance in incentive schemes
Strategy	ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	1.2 Double materiality analysis 2.1 Climate change
	E1-1	Transition plan for climate change mitigation	2.1.1 Transition plan for climate change mitigation
Impacts, risks and opportunities management	ESRS 2 IRO-1	Description of the processes to identify and assess material climate-related impacts, risks and opportunities	1.2 Double materiality analysis 2.1 Climate change
	E1-2	Policies related to climate change mitigation and adaptation	1.3.3 Framework of policies, principles and declarations in the area of sustainability 2.1 Climate change
	E1-3	Actions and resources in relation to climate change policies	2.1.2 Managing and monitoring the risks associated with climate change 2.1.3 Energy consumption and carbon footprint

Metrics and targets	E1-4	Targets related to climate change mitigation and adaptation	2.1.1 Transition plan for climate change mitigation 2.1.3 Energy consumption and carbon footprint
	E1-5	Energy consumption and mix	2.1.3 Energy consumption and carbon footprint
	E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions	2.1.3 Energy consumption and carbon footprint
	E1-7	GHG removals and GHG mitigation projects financed through carbon credits	2.1.3 Energy consumption and carbon footprint
	E1-8	Internal carbon pricing scheme	2.1.3 Energy consumption and carbon footprint
	E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	2.1.2 Managing and monitoring the risks associated with climate change
ESRS E2, E3, E4, E5			
Impacts, risks and opportunities management	ESRS 2 IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	1.2 Double materiality analysis
ESRS S1: Own workforce			
Strategy	SBM-2	Interests and views of stakeholders	1.2 Double materiality analysis 3.1.7 Dialogue with employees
	SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	1.2 Double materiality analysis 3.1 Own workforce
Impacts, risks and opportunities management	S1-1	Policies related to own workforce	1.3.3 Framework of policies, principles and declarations in the area of sustainability
	S1-2	Processes for engaging with own workers and workers' representatives about impacts	3.1.6.3 Trade union rights and right of association 3.1.7 Dialogue with employees
	S1-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	3.2.1 Customer experience and customer care
	S1-4	Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	3.1.2 Talent 3.1.3 Training 3.1.4 Diversity 3.1.5 Remuneration policy 3.1.6 Workplace environment and organisation

Metrics and targets	S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	3.1.3 Training 3.1.4 Diversity 3.1.5 Remuneration policy
	S1-6	Characteristics of the undertaking's employees	3.1.1 Characteristics of the undertaking's employees
	S1-8	Collective bargaining coverage and social dialogue	3.1.6.3 Trade union rights and right of association
	S1-9	Diversity metrics	3.1.4 Diversity
	S1-10	Adequate wages	3.1.5 Remuneration policy
	S1-12	Persons with disabilities	3.1.4 Diversity
	S1-13	Training and skills development	3.1.3 Training
	S1-14	Health and safety	3.1.6.2 Health and safety
	S1-15	Work-life balance	3.1.6.1 Work-life balance
	S1-16	Compensation metrics (pay gap and total compensation)	3.1.5 Remuneration policy
	S1-17	Incidents, complaints and severe human rights impacts	1.3.4 Due diligence procedures in relation to human rights
ESRS S4: Consumers and end-users			
Strategy	SBM-2	Interests and views of stakeholders	1.2 Double materiality analysis
	SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	1.2 Double materiality analysis
Impacts, risks and opportunities management	S4-1	Policies related to consumers and end-users	1.3.3 Framework of policies, principles and declarations in the area of sustainability 3.2.2 Information transparency 3.2.3 Data protection 3.2.4 Cybersecurity
	S4-2	Processes for engaging with consumers and end-users about impacts	3.2.1 Customer experience and customer care 3.2.5.1 Vulnerable customers 3.2.5.2 Sogeviso 3.2.5.3 Code of Good Practice
	S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	3.2.1 Customer experience and customer care
	S4-4	Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	3.2.3 Data protection 3.2.4 Cybersecurity 3.2.5.1 Vulnerable customers 3.2.5.2 Sogeviso 3.2.5.3 Code of Good Practice 3.2.5.4 Social and volunteering activities
Metrics and targets	S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	3.2 Consumers and end-users

ESRS G1: Business conduct

Governance	GOV-1	The role of the administrative, management and supervisory bodies	1.3.1. Sustainability governance
Impacts, risks and opportunities management	IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	1.2 Double materiality analysis
	G1-1	Corporate culture and business conduct policies and corporate culture	1.3.3 Framework of policies, principles and declarations in the area of sustainability 4.1 Business conduct
	G1-2	Management of relationships with suppliers	4.2 Management of relationships with suppliers
	G1-3	Prevention and detection of corruption and bribery	4.1.2 Corruption and bribery
Metrics and targets	G1-4	Confirmed incidents of corruption or bribery	4.1.2 Corruption and bribery



BANCO DE SABADELL, S.A. and Subsidiaries

Limited Assurance Report Issued by an
Assurance Provider on the Consolidated Non-
Financial Information Statement (NFIS) and
Sustainability Reporting

31 December 2025

*(Translation from the original in Spanish. In
the event of discrepancy, the Spanish-
language version prevails.)*



KPMG Auditores, S.L.
Paseo de la Castellana, 259C
28046 Madrid

Limited Assurance Report Issued by an Assurance Provider on the Consolidated Non-Financial Information Statement and Sustainability Reporting of BANCO DE SABADELL, S.A. and subsidiaries for 2025

(Translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

To the Shareholders of BANCO DE SABADELL, S.A.

Limited Assurance Conclusion

Pursuant to article 49 of the Spanish Code of Commerce, we have performed a limited assurance review of the Consolidated Non-Financial Information Statement (hereinafter NFIS) of BANCO DE SABADELL, S.A. (hereinafter the Entity) and its subsidiaries (hereinafter the Group) for the year ended 31 December 2025, which forms part of the consolidated Directors' Report of the Group.

The content of the NFIS includes additional information to that required by prevailing mercantile legislation concerning non-financial information, specifically including the sustainability reporting prepared by the Group for the year ended 31 December 2025 (hereinafter the sustainability reporting) in accordance with Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 as regards corporate sustainability reporting (CSRD). This sustainability reporting has also been subject to limited assurance review.

Based on the procedures conducted and the evidence we have obtained, no issues have come to our attention that would lead us to believe that:

- a) The Group's Non-Financial Information Statement for the year ended 31 December 2025 has not been prepared, in all material respects, in accordance with the contents included in prevailing mercantile legislation and with the selected European Sustainability Reporting Standards (ESRS) or other criteria described in accordance with each subject matter in the "5.4 List of disclosure requirements fulfilled" table of the aforementioned statement.
- b) the sustainability reporting as a whole has not been prepared, in all material respects, in accordance with the sustainability reporting framework applied by the Group and identified in the accompanying note "1.1 Introduction", including:
 - That the description provided of the process to identify the sustainability reporting included in note "1.2 Double materiality analysis" is consistent with the process in place and that it identifies the material information to be disclosed in accordance with the requirements of the ESRS.
 - Compliance with the ESRS.
 - Compliance of the disclosure requirements, included in subsection "Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation) Taxonomy indicators" of the environmental section of the sustainability reporting with article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment.

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N.I.F. B-78610153

Basis for Conclusion

We have performed our limited assurance engagement in accordance with generally accepted professional standards applicable in Spain and specifically with the guidelines contained in the Revised Guidelines 47 and 56 issued by the Spanish Institute of Registered Auditors on assurance engagements on non-financial information and considering the content of the note published by the ICAC on 18 December 2024 (hereinafter generally accepted professional standards).

The procedures applied in a limited assurance engagement are less extensive compared to those required in a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is lower than the level of assurance that would have been obtained had a reasonable assurance engagement been performed.

Our responsibilities under those standards are described in more detail in the *Responsibilities of the assurance provider* section of our report.

We have complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including international independence standards) of the International Ethics Standards Board for Accountants (IESBA Code of Ethics), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Our firm applies International Standard on Quality Management 1 (ISQM 1), which requires a quality management system to be designed, implemented and operated that includes policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Directors' Responsibilities

The preparation of the NFIS included in the Consolidated Directors' Report of the Group, and the content thereof, is the responsibility of the Directors of BANCO DE SABADELL, S.A. The NFIS has been prepared in accordance with prevailing mercantile legislation and the selected ESRS and other criteria described in accordance with each subject matter in the "5.4 List of disclosure requirements fulfilled" table of the aforementioned statement.

This responsibility also encompasses the design, implementation and maintenance of internal control deemed necessary to ensure that the NFIS is free from material misstatement, whether due to fraud or error.

The Directors of BANCO DE SABADELL, S.A. are also responsible for defining, implementing, adapting and maintaining the management systems from which the information required to prepare the NFIS was obtained.

In relation to sustainability reporting, the entity's Directors are responsible for developing and implementing a process to identify the information to be included in sustainability reporting in accordance with the CSRD, the ESRS and article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 and for disclosing information about this process in the sustainability disclosures themselves in note "1.2 Double materiality analysis". This responsibility includes:

- understanding the context in which the Group's business activities and relationships are conducted, and its stakeholders, in relation to the Group's impact on people and the environment.
- identifying actual and potential impacts (both negative and positive), and any risks and opportunities that might affect, or could reasonably be expected to affect, the Group's financial position, financial performance, cash flows, access to financing and the cost of capital in the short, medium or long term.
- evaluating the materiality of the impacts, risks and opportunities identified.
- making assumptions and estimates that are reasonable in the circumstances.

The Directors are also responsible for the preparation of sustainability reporting, including the information identified by the process, in accordance with the sustainability reporting framework applied, including compliance with the CSRD, compliance with the ESRS and compliance with the disclosure requirements included in the subsection "*Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation) Taxonomy indicators*" of the environmental section of the sustainability reporting with article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment.

This responsibility includes:

- Designing, implementing and maintaining such internal control as the Directors determine is relevant to enable the preparation of sustainability reporting that is free from material misstatement, whether due to fraud or error.
- Selecting and applying appropriate methods for sustainability reporting and making assumptions and estimates that are reasonable in the circumstances for specific disclosures.

Inherent Limitations in the Preparation of the Information

In accordance with the ESRS, the entity's Directors are required to prepare prospective information based on assumptions, which are to be included in the sustainability reporting, about events that may occur in the future, as well as possible future actions, if any, that the Group may take. The actual outcome may differ significantly from the estimate, as it refers to the future and future events often do not occur as expected.

In determining sustainability disclosures, an entity's management interprets legal and other terms that are not clearly defined and may be interpreted differently by other people, including the legal conformity of such interpretations, and are therefore subject to uncertainty.

Responsibilities of the Assurance Provider

Our objectives are to plan and perform the assurance engagement in order to obtain limited assurance about whether the NFIS and sustainability reporting is free from material misstatement, whether due to fraud or error, and to issue a limited assurance report containing our conclusions thereon. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the decisions of users taken on the basis of this information.

As part of a limited assurance engagement, we apply our professional judgement and maintain an attitude of professional scepticism throughout the engagement. We also:

- Design and implement procedures to assess whether the process for identifying the information to be included in both the NFIS and sustainability reporting is consistent with the description of the process followed by the Group and enables, where appropriate, the identification of material information to be disclosed in accordance with the requirements of the ESRS.
- Apply risk-based procedures, including obtaining an understanding of internal controls relevant to the engagement in order to identify the disclosures in which it is most likely that material misstatements arise, whether due to fraud or error, but not for the purpose of providing a conclusion about the effectiveness of the Group's internal control.
- Design and implement procedures that respond to disclosures in both the NFIS and sustainability reporting in which material misstatements are likely to arise. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

Summary of the Work Carried Out

A limited assurance engagement includes performing procedures to obtain evidence to support our conclusions. The nature, timing and extent of the procedures selected depend on professional judgement, including an identification of the disclosures in which material misstatements, whether due to fraud or error, are likely to arise in the NFIS and sustainability reporting.

Our work has consisted of making inquiries of management, as well as of the different units and components of the Group that have participated in the preparation of the NFIS, reviewing the processes for compiling and validating the information presented in the NFIS and sustainability reporting and applying certain analytical procedures and sample review tests, which are described below:

In relation to the NFIS assurance review process:

- Meetings with the Group's personnel to gain an understanding of the business model, policies and management approaches applied, the principal risks related to these matters and to obtain the information necessary for the external review.
- Analysis of the scope, relevance and completeness of the content of the NFIS for 2025 based on the materiality analysis performed by the Group and described in the "1.2 Double materiality analysis" section, considering the content required by prevailing mercantile legislation.
- Analysis of the processes for compiling and validating the data presented in the NFIS for 2025.
- Review of the information related to the risks, policies and management approaches applied in relation to the material aspects presented in the NFIS for 2025.
- Corroboration, through sample testing, of the information relative to the content of the NFIS for 2025 and whether it has been adequately compiled based on data provided by the information sources.

In relation to the assurance on sustainability reporting process:

- Making inquiries of Group personnel:
 - to gain an understanding of the business model, policies and management approaches applied, the principal risks related to these matters and to obtain the information necessary for the external review.
 - to understand the source of information used by management (e.g. stakeholder interaction, business plans and strategy documents); and the review of the Group's internal documentation on its process.
- Gaining, through inquiries with Group personnel, an understanding of the entity's processes for collecting, validating and presenting information relevant to the preparation of its sustainability reporting.
- Assessing the consistency of the evidence obtained from our procedures on the Group-implemented process to determine the information to be included in sustainability reporting with the description of the process included in such disclosures and assessing whether the Group-implemented process identifies the material information to be disclosed in accordance with the requirements of the ESRS.
- Assessing whether all the information identified in the Group-implemented process to determine the information to be included in sustainability reporting is effectively included.
- Assessing the consistency of the structure and presentation of sustainability reporting with the provisions of the ESRS and the rest of the sustainability reporting framework applied by the Group.
- Conducting inquiries of relevant personnel and analytical procedures on information disclosed in the sustainability reporting, considering information in which material misstatements are likely to arise, whether due to fraud or error.
- Performing, where appropriate, substantive sampling procedures on the information disclosed in the selected sustainability reporting, considering information in which material misstatements are likely to arise, whether due to fraud or error.
- Procuring, where applicable, the reports issued by accredited independent third parties accompanying the consolidated Directors' Report in compliance with EU regulations and, in relation to the information to which they refer and in accordance with generally accepted professional standards, confirming, exclusively, the accreditation of the assurance provider and that the scope of the report issued complies with EU regulations.
- Procuring, where appropriate, the documents containing the information included by reference, the reports issued by auditors or assurance providers of such documents and, in accordance with generally accepted professional standards, confirming, exclusively, that, as regards the document to which the information included by reference, the conditions described in the ESRS for including information by reference in the sustainability reporting are met.
- Procuring a representation letter from the Directors and management regarding the NFIS and sustainability reporting.



Other Information

The Directors of Banco de Sabadell, S.A. are responsible for the other information. The other information comprises the consolidated annual accounts and other information included in the consolidated Directors' Report but does not include either the auditor's report on the consolidated annual accounts or the assurance reports issued by accredited independent third parties required by EU law on specific disclosures contained in the sustainability reporting and accompanying the consolidated Directors' Report.

Our assurance report does not cover the other information, and we do not express any assurance conclusions about it.

In connection with our assurance engagement on the sustainability reporting, our responsibility consists of reading the other information identified above and, in doing so, consider whether there is a material inconsistency between the other information and the sustainability reporting or the knowledge we have obtained during the assurance engagement that could be indicative of material misstatements in the sustainability reporting.

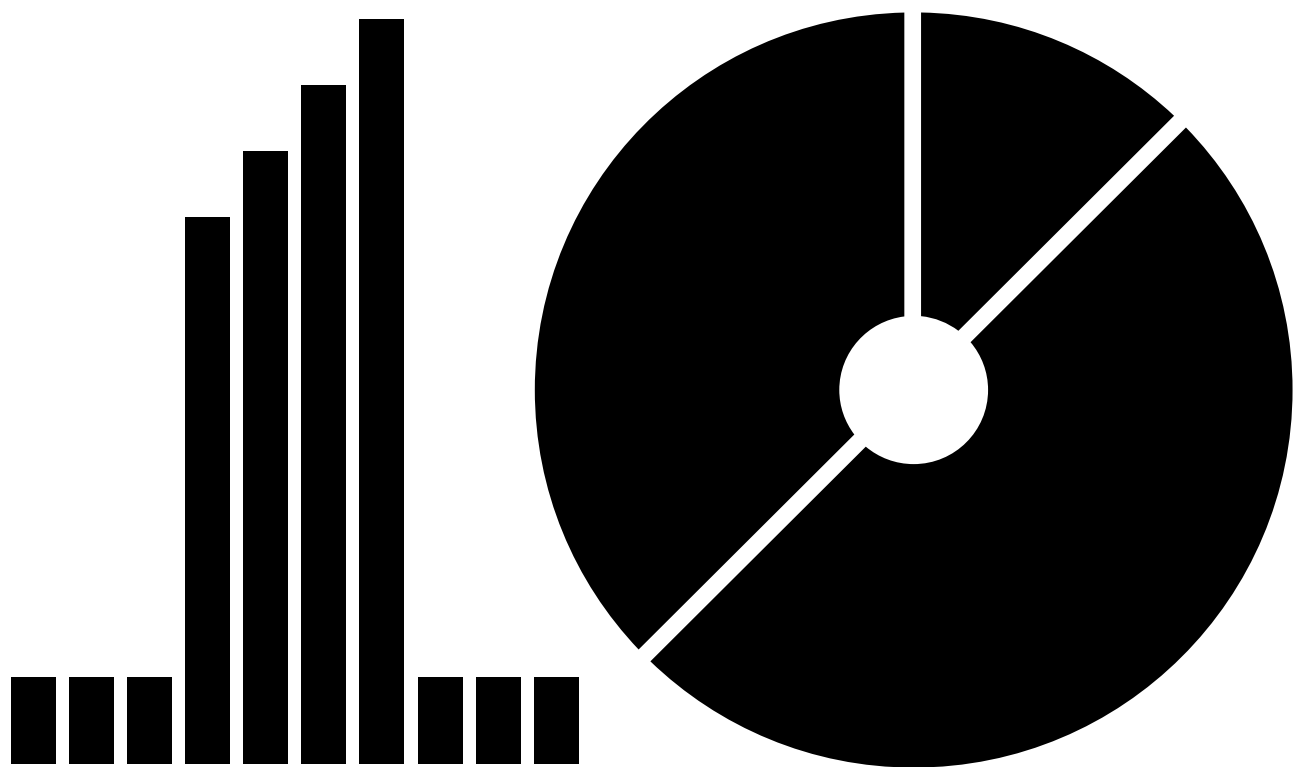
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(Signed on original in Spanish)

Patricia Reverter

20 February 2026

Annual Corporate Governance Report



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¹ The references alongside each section heading in this report refer to the sections of the standard form for the Annual Corporate Governance Report from the Spanish National Securities Market Commission (CNMV).

Banco de Sabadell, S.A. (hereinafter, Banco Sabadell, the Bank or the Institution) has a solid corporate governance structure that guarantees efficient and prudent management which prioritises sound ethical and transparent governance, taking into account the interests of shareholders, customers, employees and society in the geographies in which it operates.

The Bank remains committed to continuously improving and strengthening corporate governance, acting in defence of its shareholders' interests, and returning value to them. On that basis, the Bank acted quickly, nimbly and flexibly during 2025, paying constant attention to emerging challenges, both general — such as the new global geopolitical conditions— and specific —arising from the "hostile" takeover bid against the Bank in 2025. In this regard, the Bank's Board of Directors and its Committees held extraordinary and emergency meetings in which the directors participated, enriching the debate with their diverse perspectives and contributing their knowledge to the governing bodies of which they are members. The Bank also ensured that it always had the necessary specialised technical advice for decision-making, both in the legal and financial spheres.

In short, thanks to its robust corporate governance structure, Banco Sabadell responded to the challenges that arose during 2025 with full capacity and high-quality performance, completing its strategic planning for the coming years so as to enable it to continue growing steadily and sustainably while maintaining strong capital generation so as to continue providing shareholders with distinctive returns.

Banco Sabadell is strongly committed to transparency and accountability, as evidenced in the publication of its decisions and the reasons behind them, not only in the form of the disclosures required by law but also through numerous meetings with stakeholders, by holding corporate governance and financial roadshows and press conferences and by pursuing other avenues to keep its shareholders, the market and society informed at all times. In this way, Banco Sabadell highlights its commitment to transparency, which, together with its solid sustained capacity for execution, further enhances its high level of credibility.

The Annual Corporate Governance Report is drawn up with information on the Bank at 2025 year-end and, with the Annual Report on Director Remuneration, forms part of the Directors' Report that accompanies the separate and consolidated financial statements. It was approved unanimously by the Board of Directors at a meeting on 19 February 2026 in compliance with the provisions of Article 540 of the Capital Companies Law and CNMV Circular 5/2013, of 12 June 2013.

The preparation and format of the Report is governed by the provisions of CNMV Circular 5/2013, as amended by CNMV Circular 2/2018 of 12 June, CNMV Circular 1/2020 of 6 October, and CNMV Circular 3/2021, of 28 September. As in previous years, Banco Sabadell decided to adopt the free PDF format in accordance with Circular 2/2018, of 12 June, in order to disclose and describe the main aspects of its corporate governance with the utmost transparency. The current versions of those documents are available on the website [www. grupobancosabadell.com](http://www.grupobancosabadell.com), in the section on "Corporate Governance and Remuneration Policy".



www.grupbancsabadell.com

>Corporate Governance and
Remuneration Policy

>Annual Corporate Governance Report

Corporate Governance of Banco Sabadell in 2025

In 2025, Banco Sabadell continued to enhance its corporate governance in line with best practices. In particular, the Bank was active in the following areas:

Strategy

Banco Sabadell continues to devote the necessary attention to strategy, through continuous oversight by the Strategy and Sustainability Committee and by the Board of Directors, which sets the company's overall strategy.

The Board of Directors approved a new 2025-2027 Business Plan in July 2025. Following the trend set out in the first half of 2025, the three-year period covered by the new business plan is projected to provide recurring sustainable growth and an increase in profitability to 16%, which will enable the Bank to continue generating capital and offering differential remuneration to shareholders. The Bank will accelerate its processes and move forward in a prudent, sustainable and sound manner, with sustained growth in lending volumes and customer funds, improvements in asset quality, growth in customer acquisition and a moderate increase in market share in Spain.



Transparency and participation

The Bank maintained the highest standards of transparency and participation to improve and encourage shareholder participation in the General Meeting of Shareholders on 20 March 2025 and in the two Extraordinary Meetings of Shareholders on 6 August 2025; since 2022, in addition to attending in person, shareholders are able to use distance means to attend, vote on the motions on the agenda, and submit their comments during the question and answer session.

To this end, the Bank again arranged the usual electronic channels through Banco Sabadell's websites (corporate and BSOline) and the mobile app (BSMóvil) to enable shareholders to grant proxy and vote in advance of the General Meetings of Shareholders.

Those channels are integrated with the Bank's website and provide shareholders (both customers and non-customers) with a straightforward agile experience and a simple form of interaction. For further details on the means of participation in the General Meeting of Shareholders, see the section "Communications within the framework of the General Meeting of Shareholders" in the section "2.1.2 Shareholder participation in 2025" of the Annual Corporate Governance Report.

In addition to the measures related to the General Meeting of Shareholders, the Bank increased the number of contacts with investors and proxy advisors through roadshows organized by Investor Relations, all of which enhanced transparency in engagement. The purpose of the Bank's engagement with proxy advisors is detailed under "Proxy Advisors" in section "2.1.2 Shareholder participation in 2025" of the Annual Corporate Governance Report.

In response to an analysis of best practices observed in the market for defining the amount, format, frequency and recurrence of shareholder remuneration, the Bank submitted a new Banco Sabadell Shareholder Remuneration Policy to the 2025 General Meeting of Shareholders, which was adopted with 99.86% of the votes in favour. The explanation and justification of the reasons for the proposal drawn up by the Board of Directors are detailed in section "2.1.3 Shareholder remuneration policy" of the Annual Corporate Governance Report.

Sustainability and diversity

Banco Sabadell continues to advance in its activity and organization with the goal of supporting and accelerating major economic and social transformations that contribute to sustainable development and the fight against climate change. Firm in this resolve, the Bank maintains its Sustainable Commitment, which was adopted in 2022 and sets out a framework for action that integrates a forward-looking view of environmental, social and governance (ESG) commitments for 2025-2050 into the Bank's strategy, aligns business objectives with the Sustainable Development Goals (SDGs), and establishes levers for action with steps to transform and promote initiatives in this area. For further details on the Bank's Sustainable Commitment, see the section entitled "The importance of Sustainability in the Banco Sabadell Group's Corporate Governance".

For the fifth consecutive year, Banco Sabadell's General Meetings of Shareholders were certified as "sustainable events" as they met the requirements for sustainability certification and passed the preliminary evaluation process and the on-site audit established by Eventsost.

External assessment and other evaluations

Banco Sabadell's commitment to following best practices and the highest standards of corporate governance is reflected in the good results obtained by the Bank in ESG analysts' reports during 2025. In the area of governance, the Bank received excellent scores in connection with the Board of Directors, shareholder rights and the effective control and supervision of risks.

Additionally, an external consultant checked the procedures established for preparing and holding the 2025 General Meeting of Shareholders. The external consultant checked that, from a technical, procedural and legal standpoint, the requirements, internal procedures and applicable standards were applied in Phase I (before the Meeting), Phase II (Meeting) and Phase III (after the Meeting). Greater details on the checks performed in connection with the General Meeting of Shareholders can be found in section "2.3 General Meeting of Shareholders 2025" of the Annual Corporate Governance Report.

With regard to the recommendations of the CNMV's Code of Good Governance, in 2025 Banco Sabadell fully complied with the 56 recommendations applicable to it, including recommendation 15, which establishes that women should account for at least 40% of the members of the Board of Directors.

The Board of Directors and the Appointments and Corporate Governance Committee are committed to favouring diversity on the Board; they work to ensure that the Board has a sufficient number of female directors and to fulfil the objective for representation of the gender that is under-represented on the Board.

In compliance with this, the Appointments and Corporate Governance Committee proposed to the Board of Directors that the 2025 General Meeting of Shareholders be asked to appoint Ms. María Gloria Hernández García and Ms. Margarita Salvans Puigbò as independent directors, in place of independent directors, Ms. Alicia Reyes Revuelta and Ms. Laura González Molero, who resigned with effect from the date of the Ordinary General Meeting of Shareholders. These appointments maintained the percentage of female representation on the Board at 40% in 2025, bringing forward fulfilment of the Bank's commitment as set out in the Sabadell Sustainable Commitment and complying with the provisions of Spain's Organic Law 2/2024, of 1 August, on the equal representation and balanced presence of women and men. At the end of 2025, when the Board comprised 14 members, that percentage stood at 43%.

The Appointments and Corporate Governance Committee is made up mostly of women (60% of the Committee), while women represent 75% of the Audit and Control Committee and 100% of the Remuneration Committee.

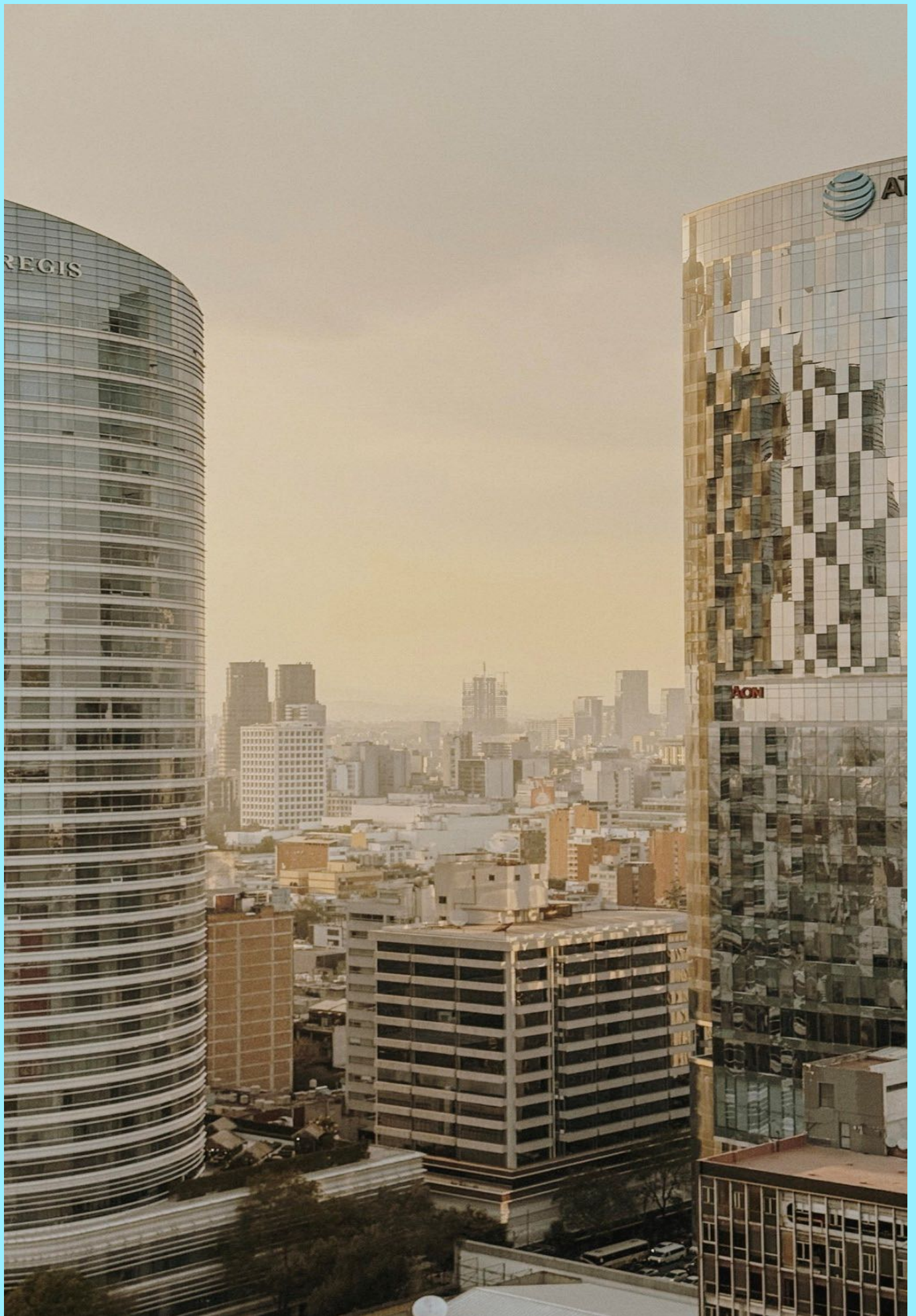
In order to maintain the Bank's high standards of corporate governance and ensure its continuous alignment with regulatory requirements, supervisors' expectations and national and international best practices, the Appointments and Corporate Governance Committee engaged an independent expert to assess the performance of the Board and its committees in 2025. The Committee engages independent external experts periodically (every three years) to carry out the evaluation of the Board and its Committees. This good practice, which is aligned with the CNMV's Code of Good Governance recommendations, provides external input to validate the effectiveness of the performance of the Board and its committees and to identify areas for improvement to ensure that the Board is always at the forefront. The assessment for 2025, which concluded in January 2026, was approved by the Board of Directors, following a report by the Appointments and Corporate Governance Committee, on 5 February 2026 with a satisfactory result. The external expert concluded that, based on the analysis carried out,

Banco Sabadell complies with all applicable regulatory requirements and has a very high degree of compliance with recommendations and best practices in the area of corporate governance. The Board also found that its own functioning and the functioning of its Committees, and the performance of the Chairman, Deputy Chairman, Chief Executive Officer, Lead Independent Director and Secretary and Deputy Secretary of the Board in 2025 were consistent with a standard of excellence.

It is also noteworthy that the motions on the agenda for the General Meeting of Shareholders obtained a high proportion of votes in favour. All the items on the agenda were approved with an average of 96.48% of votes in favour. By way of illustration, the motions to approve the financial statements and grant discharge were approved with 99.75% of votes in favour, and the distribution of income and the dividend were approved with 99.81% of votes in favour. The appointment of independent directors Ms. María Gloria Hernández García and Ms. Margarita Salvans Puigbò was approved with 99.47% and 99.45% of votes in favour, respectively, and the advisory vote on the Annual Report on Director Remuneration for the previous year obtained 81.32% of votes in favour. The outcome of the votes on the motions submitted to the two Extraordinary General Meeting of Shareholders on 6 August 2025 was also noteworthy. At the first Meeting, the authorisation to dispose of the entire share capital of Banco Sabadell subsidiary TSB Banking Group plc and other capital instruments and securities issued by the latter was approved with 99.58% of votes in favour; at the second Meeting, the distribution of an extraordinary cash dividend of 50 euro cent (gross) per share charged to unrestricted voluntary reserves, conditional on the sale of TSB Banking Group plc, was approved with 99.66% of votes in favour.

Banco Sabadell retains its position in the MSCI World Index

Banco Sabadell has been a component of the MSCI World index since the end of May 2024. This index brings together more than 1,400 companies from the world's most developed economies and serves as a benchmark for analysing international market performance. The Bank's inclusion in the index increases its presence in international financial media and in other sub-indexes, which means that passively managed funds, whose strategies are based on replicating this type of indicators, increase their holdings in the Bank. During 2025, the Bank continued to be part of this index, demonstrating its sound financial performance and consolidating its presence in international financial circles.



Board of Directors

The following changes were made in the Board of Directors in 2025:

- On 6 February 2025, Ms. Laura González Molero tendered her resignation as an independent director of Banco Sabadell, effective as of the date of the following Ordinary General Meeting of Shareholders, which was held on 20 March 2025.
- Also, by means of a letter dated 6 February 2025, Ms. Alicia Reyes Revuelta communicated her decision not to seek re-appointment as a member of the Board with effect from the date of the next Ordinary General Meeting of Shareholders, which took place on 20 March 2025.
- Ms. María Gloria Hernández García and Ms. Margarita Salvans Puigbò were appointed as independent directors to fill the vacancies left by the resignations of Ms. Alicia Reyes Revuelta and Ms. Laura González Molero, by means of a resolution of the Ordinary General Meeting of Shareholders on 20 March 2025, and they took up their positions on the Board at meetings on 29 May 2025 and 26 June 2025, respectively, once the pertinent regulatory authorisations had been received.
- Mr. David Martínez Guzmán submitted his resignation as a director by means of a letter received on 24 November 2025, effective that same day.

The incorporation of Ms. María Gloria Hernández García and Ms. Margarita Salvans Puigbò increased and strengthened the diversity of financial knowledge and experience on the Board. Ms. María Gloria Hernández García is an economist with experience as an executive and an independent director, and expertise in the financial sector, capital markets, retail and corporate banking, planning and strategy, risk management and control, accounting and auditing, corporate governance and sustainability. Ms. Margarita Salvans Puigbò has a financial profile with executive and business experience, and knowledge of the financial sector, retail banking, planning and strategy, risk management and control, and accounting. The new female directors have proven ability to apply this knowledge and expertise to the banking business. All the foregoing, combined with the new directors' multidisciplinary and executive skills, contributed to strengthening the collective suitability of the Board of Directors and maintaining its collective capacity to challenge the Bank's executives and to exercise supervisory oversight.

Furthermore, as indicated above, their incorporation maintained the percentage of female representation on the Board at 40%, as achieved in 2024, rising to 43% at the end of 2025, when the Board was composed of 14 members.

Following these changes, the Board of Directors of Banco Sabadell is composed of its Chairman, ten independent directors, two executive directors and one other external director.

Board of Directors Committees

The structure of the Board committees remained unchanged in 2025, as reflected in the Articles of Association, which were last amended by the General Meeting of Shareholders in 2021.

On 20 March 2025, Ms. Laura González Molero stepped down as a member of the Audit and Control Committee and the Remuneration Committee as a result of her resignation as a director. Ms. Alicia Reyes Revuelta stepped down as a member of the Credit Delegated Committee and the Risk Committee.

At a meeting on 28 April 2025, the Board of Directors resolved, following a report from the Appointments and Corporate Governance Committee, to amend the composition of the Board of Directors' Committees: Ms. Mireya Giné Torrens was appointed as a member of the Credit Delegated Committee and ceased to be a member of the Appointments and Corporate Governance Committee; Ms. Ana Colonques García-Planas was appointed as a member of the Appointments and Corporate Governance Committee; and Mr. Pedro Viñolas Serra was appointed as a member of the Appointments and Corporate Governance Committee.

In pursuit of continuous improvement in the Bank's corporate governance, following the appointment of Ms. María Gloria Hernández García as an independent director and after analysis by the Appointments and Corporate Governance Committee of the composition of the Committees, the Board of Directors resolved, at a meeting on 29 May 2025, to appoint Ms. María Gloria Hernández García as a member of the Audit and Control Committee and of the Risk Committee, given her expertise in accounting and auditing and risk management and control. On the same date, Mr. Pedro Viñolas Serra ceased to be a member of the Audit and Control Committee.

At the Board meeting on 26 June 2025, following the appointment of Ms. Margarita Salvans Puigbò as an independent director, she was appointed as a member of the Audit and Control Committee and the Remuneration Committee, given her expertise in accounting and auditing, human resources, culture, talent and remuneration. The Appointments and Corporate Governance Committee expressed its appreciation for the valuable contribution made by the directors' to those Committees as a result of their business experience.

These appointments maintain a high percentage of women, as the less-represented gender, on the Board Committees, and reinforced its diversity in terms of age.

The current composition of the Board Committees is as follows:

Committee	Name	Position
Strategy and sustainability	Josep Olliu Creus	Chairman
	Lluís Deulofeu Fuguet	Member
	Pedro Fontana García	Member
	María José García Beato	Member
	César González-Bueno	Member
	Mayer Wittgenstein*	
	George Donald Johnston III	Member
	Miquel Roca i Junyent	Non-member secretary
Credit Delegated	Pedro Fontana García	Chairman
	Lluís Deulofeu Fuguet	Member
	César González-Bueno	Member
	Mayer Wittgenstein*	
	Mireya Giné Torrens	Member
	Pedro Viñolas Serra	Member
	David Vegara Figueras	Permanent observer
	Gonzalo Barettino Coloma	Non-member secretary
Audit and Control	Manuel Valls Morató	Chairman
	Ana Colonques García-Planas	Member
	María Gloria Hernández García	Member
	Margarita Salvans Puigbò	Member
	Miquel Roca i Junyent	Non-member secretary
Appointments and Corporate Governance	Pedro Fontana García	Chairman
	Aurora Catá Sala	Member
	Ana Colonques García-Planas	Member
	María José García Beato	Member
	Pedro Viñolas Serra	Member
	Miquel Roca i Junyent	Non-member secretary
Remuneration	Mireya Giné Torrens	Chairman
	Ana Colonques García-Planas	Member
	Margarita Salvans Puigbò	Member
	Gonzalo Barettino Coloma	Non-member secretary
Risk	George Donald Johnston III	Chairman
	Aurora Catá Sala	Member
	María Gloria Hernández García	Member
	Manuel Valls Morató	Member
	Gonzalo Barettino Coloma	Non-member secretary

* Member solely for matters of strategy.

Matrix of competencies and diversity in the Board of Directors

Since 2019, Banco Sabadell has had a Matrix of competencies and diversity, which is reviewed each year by the Board of Directors following a favourable report from the Appointments and Corporate Governance Committee; it was last reviewed on 27 March 2025 on the occasion of the most recent appointments: Ms. María Gloria Hernández García and Ms. Margarita Salvans Puigbò. Additionally, in November 2025, on the occasion of the resignation of Mr. David Martínez Guzmán as a director, the Appointments and Corporate Governance Committee conducted an analysis of the composition of the Board and an assessment of its collective suitability, and reviewed the Board's Competency Matrix; as a result, it ordered that the Internal Governance Framework and the Board's Competency Matrix be updated and republished.

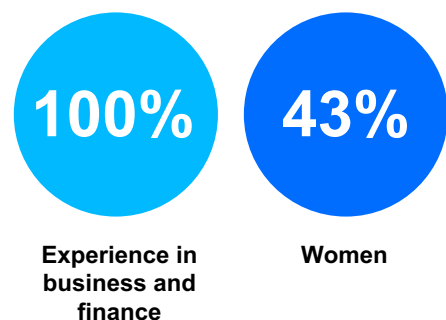
The Matrix defines the skills and knowledge of the members of the Board of Directors in the following areas: retail and corporate banking; financial and capital markets; insurance; other financial competencies; accounting and auditing; risk management; planning and strategy; governance; risk control; prevention of money laundering and terrorist financing; legal; digital and IT (digital transformation); human resources, culture, talent and remuneration; responsible business and sustainability; international experience; governing bodies; management and leadership of organizations; business experience; governance and public policy; consulting; regulatory and supervisory bodies; academia; and communication and institutional relations.

From 2024, women represented 40% of the Board of Directors and 50% of the independent directors, in line with the Directive of the European Parliament and of the Council on improving the gender balance among directors of listed companies and related measures; this also fulfilled in advance the requirements of Spain's Organic Law 2/2024, of 1 August, on the equal representation and balanced presence of women and men.

As previously indicated, the General Meeting of Shareholders on 20 March 2025 resolved to appoint two female independent directors to replace two other female independent directors. Those appointments maintained the percentage of female representation on the Board at 40%, as achieved in 2024, rising to 43% at the end of 2025, when the Board was composed of 14 members.

Knowledge, skills and experience were reinforced in the following areas in 2025: retail banking; financial and capital markets; insurance; accounting and auditing; risk management and control; governance; human resources; culture, talent and remuneration, and competencies in governing bodies, as well as management and leadership of organizations and business experience.

Diversity and competencies: highlights



Commitment to sustainability in Banco Sabadell Group's Corporate Governance

During 2025, sustainability maintained its position as a strategic component of our way of doing business across the Banco Sabadell Group, and it was an integral part of all decision-making, of the business model and of relations with stakeholders. This integration is a result of the both the Group's commitment and the requirements of European regulations, particularly Directive 2022/2464 (CSRD) and Regulation 2020/852 (Taxonomy Regulation).

The Group has defined a business plan for 2025–2027 that sets out four priority strategic areas in connection with sustainability:

- Lead the way in advising sustainable business
- Minimise the impact of ESG risk on the balance sheet and capital
- Advance as a sustainable institution
- Be recognised by the market and valued by the supervisor.

Furthermore, the Sustainable Development Goals (SDGs) continue to be a fundamental component of the Group's commitment to sustainability and are articulated through specific policies, indicators and action plans.

In 2025, the Board of Directors reviewed the Group's Sustainability Policy, which incorporates ESG criteria into its activities and organisation, and reinforces senior management involvement by linking variable remuneration to ESG targets. Progress has also been made in measuring and managing climate, social and governance risks, including the development of internal double materiality models.

The Strategy and Sustainability Committee, established in 2021, has the following functions in the area of sustainability:

- Analysing and advising the Board of Directors on the bank's sustainability and environmental policies.
- Advising the Board of Directors on possible modifications and periodic updates of the sustainability strategy.
- Analysing the definition and any amendments to the diversity and integration, human rights, equal opportunities and work-life balance policies, and regularly assessing the degree to which they are complied with.
- Reviewing the Bank's social action strategy and its sponsorship and patronage plans.
- Reviewing and advising on the Bank's Statement of Non-Financial Information, prior to its review and report by the Audit and Control Committee and its subsequent adoption by the Board of Directors.
- Receiving information in connection with reports, written communiqués or communications from external supervisory bodies within the scope of this Committee's competencies.

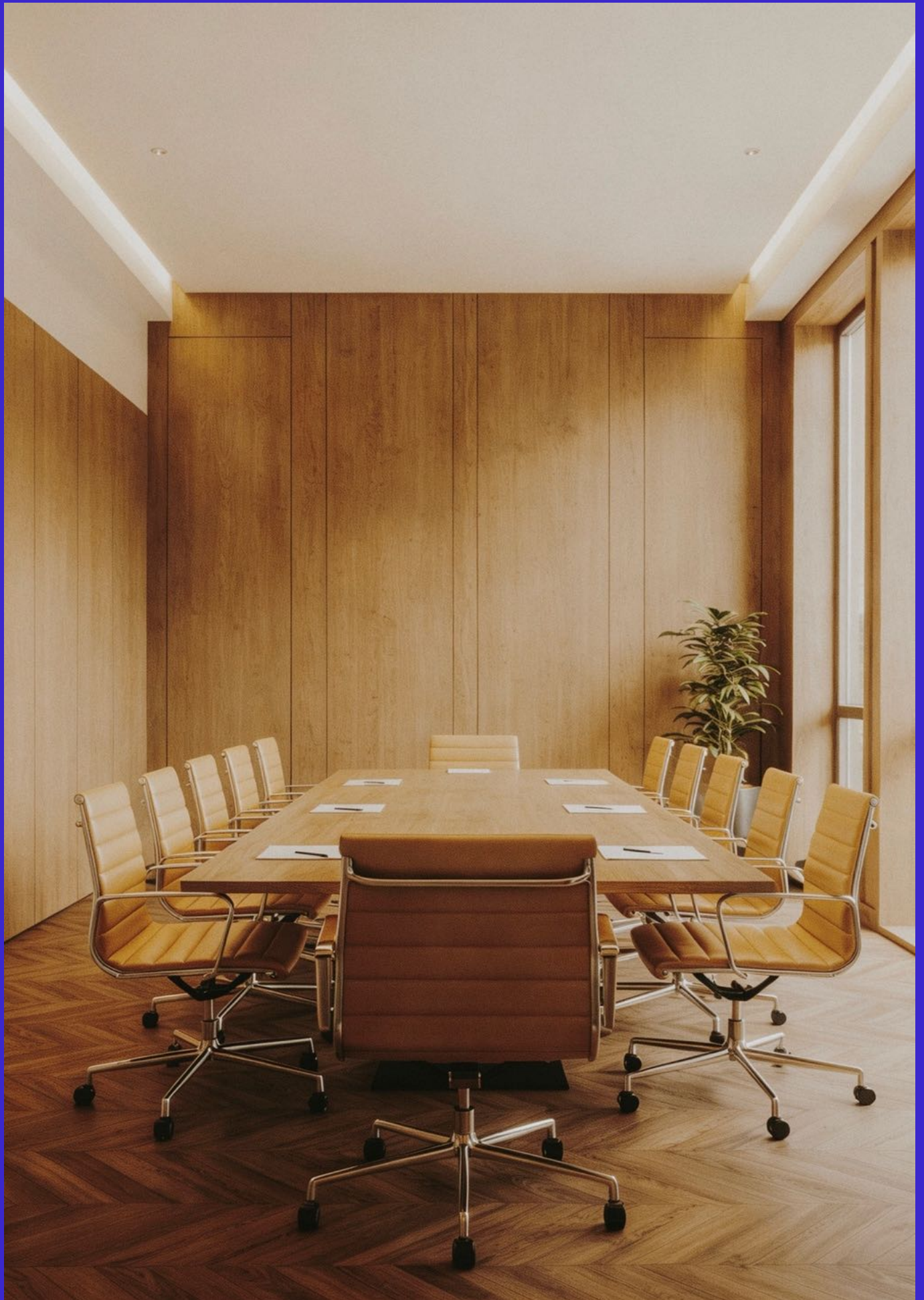
Moreover, the Sustainability Committee, chaired by the General Manager in charge of the People and Sustainability Division, is the body in charge of establishing the Bank's Sustainability Programme and monitoring its implementation, as well as defining and disseminating the general principles of action in the area of sustainability and promoting the implementation of projects and initiatives.

With regard to disclosure, the 2025 Sustainability Report, which forms part of the Consolidated Directors' Report, presents the progress made by the Banco Sabadell Group in the area of sustainability, including

decarbonisation of the loan book, carbon footprint management, promotion of the circular economy, the biodiversity protection, and the promotion of equality, diversity and human rights. This report is produced in accordance with the requirements of Directive (EU) 2022/2464 on corporate sustainability reporting (CSRD), which replaced Directive 2014/95 (NFRD), transposed into Spanish law by Law 11/2018.

The CSRD requires companies to report their non-financial information in line with a common framework of standards —the European Sustainability Reporting Standards (ESRS)— which were developed by EFRAG (European Financial Reporting Advisory Group). These standards cover environmental, social and governance aspects and require the application of the principle of double materiality, assessing both the company's impact on the environment and the effect of ESG factors on its financial situation. The report also complies with Regulation (EU) 2020/852 (Taxonomy Regulation), which requires disclosure of the degree to which economic activities are aligned with the European Union's environmental objectives.

The Sustainability Report is submitted for approval as a separate agenda item at the Annual General Meeting of Shareholders, and its content is subject to prior review by the Audit and Control Committee, in coordination with the internal control system, which guarantees the reliability of the data disclosed through hierarchical certification and traceability processes.



Contents of the Annual Corporate Governance Report

1. Ownership structure (A)

1.1. Share capital (A.1)

At 31 December 2025, the share capital of Banco Sabadell was €627,959,716.50, represented by 5,023,677,732 registered shares, with a par value of €0.125 each, all fully subscribed and paid up, representing 5,023,677 voting rights, at a ratio of one voting right for every 1,000 shares. The share capital was last modified on 29 August 2025 as a result of the capital reduction approved by the General Meeting of Shareholders on 20 March 2025; the Articles of Association do not provide for loyalty voting rights.

627,959,716.50
Euro

5,023,677,732
Registered shares

5,023,677
Voting rights

The share capital of Banco Sabadell was reduced three times in 2025.

On the first occasion, 10 April 2024, the Ordinary General Meeting of Shareholders of Banco Sabadell approved a resolution to reduce the share capital by the nominal amount of own shares that may be acquired by Banco Sabadell under the share repurchase programme with a charge to 2023 profit, up to an effective amount of at most €340 million. At a meeting on 29 January 2025, the bank's Board of Directors resolved to partially execute the capital reduction resolution approved by the General Meeting of Shareholders on 10 April 2024 in the amount of €6,566,420.625, by cancelling the 52,531,365 shares acquired under the aforementioned buyback programme up until its suspension, on 13 May 2024, by order of the CNMV, as a result of publication of the pre-announcement of the takeover bid. That resolution provided for the possibility of not executing it or executing it only partially in the light of unforeseen circumstances. That capital reduction was registered with the Mercantile Registry on 27 February 2025.

Subsequently, the Ordinary General Meeting of Shareholders of Banco Sabadell on 20 March 2025 resolved to reactivate the suspended share buyback programme, and reduce capital in consequence by the par value of the shares that are acquired, for a cash amount of at most €247 million (approximately the amount of the buyback programme that had not been executed at the time of its suspension). On 29 May 2025, the bank's Board of Directors resolved to reduce the share capital by €12,432,602.50 through the cancellation, against unrestricted reserves, of all the own shares acquired under the reactivated buyback programme (99,460,820 shares).

This reduction was approved under the powers delegated to the Board of Directors in the share capital reduction resolution approved by the aforementioned Ordinary General Meeting of Shareholders on 20 March 2025, which was registered in the Mercantile Registry on 23 June 2025.

Finally, the same Ordinary General Meeting of Shareholders of Banco Sabadell held on 20 March 2025 approved the establishment of a

new share buyback programme for a cash amount of up to €755 million and a reduction in share capital by the nominal amount of the own shares that might be acquired by Banco Sabadell under the share buyback programme, charged against unrestricted reserves. On 5 August 2025, the bank's Board of Directors resolved to reduce the share capital by €33,068,941.25 through the cancellation of all the own shares acquired under the Share Buyback Programme (264,551,530 shares). That capital reduction was registered with the Mercantile Registry on 29 August 2025.

Following this capital reduction through the cancellation of own shares, the bank's capital stock amounts to 627,959,716.50, represented by 5,023,677,732 registered shares of €0.125 par value each. All shares are fully paid up and are numbered sequentially from 1 to 5,023,677,732, both inclusive.

For more information, see the section entitled "Share Repurchase Programme" in section 1.4 Own Shares.

The shares of Banco Sabadell are uncertificated and are listed on the Barcelona, Bilbao, Madrid and Valencia stock exchanges and on the Spanish "SIBE"/Mercado Continuo stock exchange interconnection system. All the shares are of the same class and have the same associated rights.

Banco Sabadell has not issued securities that are not traded on a regulated market in the European Union.

At 2025 year-end, three investor groups within the Bank's ownership structure reported a shareholding of over 3%. According to CNMV data, those three shareholders together represented 16.04% of the total share capital. The members of the Board of Directors hold 0.24% of the Bank's share capital.

3

Investor groups that reported holdings of more than 3%. 2025

1.2 Significant shareholders (A.2, A.4, A.5, A.6, A.7 and A.8)

At 31 December 2025, the direct and indirect owners of significant stakes in Banco Sabadell were:

Name of shareholder	Voting rights attributed to the shares (%)		Voting rights through financial instruments (%)		Total voting rights (%)
	Direct	Indirect	Direct	Indirect	
BlackRock Inc.	0.00	7.18	0.00	0.05	7.23
David Martínez Guzmán	0.00	3.86	0.00	0.00	3.86
Zurich Insurance Group Ltd.	0.00	4.95	0.00	0.00	4.95

BlackRock Inc. holds its indirect stake via a number of subsidiaries.

Fintech Europe, S.À.R.L. (FE) is wholly owned by Fintech Investments Ltd. (FIL), the investment fund managed by Fintech Advisory Inc. (FAI). FAI is owned 100% by Mr. David Martínez Guzmán. Consequently, the shareholding now held by FE is considered to be controlled by Mr. David Martínez Guzmán.

Zurich Insurance Group Ltd. is the parent company of the Zurich Group and directly owns 100% of Zurich Insurance Company Ltd, which directly owns the shares in Banco de Sabadell, S.A.

The most significant changes in the ownership structure during the year that were reported to the CNMV by the holders of significant stakes, in accordance with articles 23 and 32 of Royal Decree 1362/2007 of 19 October, and whose disclosures are available on the CNMV's website, are as follows:

Name of shareholder	Transaction date	Description of change
Dimensional Fund Advisors LP	09/07/2025	Fell below 3% of voting rights attributed to shares
	24/03/2025	Exceeded 3% of voting rights attributed to shares and through financial instruments
The Goldman Sachs Group, Inc.	27/03/2025	Fell below 3% of voting rights attributed to shares and through financial instruments

Banco Sabadell is not aware of any family, commercial, contractual or corporate ties between the owners of significant stakes. Moreover, the Bank and the companies that make up Banco Sabadell Group (hereinafter "Banco Sabadell Group" or "the Group") do not have any family, commercial, contractual or corporate ties with the Bank's significant shareholders other than those arising out of ordinary business relations. The Bank has not been notified of any shareholder agreements and is not aware of any concerted action between shareholders or of the existence of any natural or legal person exerting control over the Bank in the meaning of article 4 of the Spanish Securities Markets and Investment Services Law.



1.3. Board of Directors stake in share capital (A.3)

The members of the Board of Directors own 0.24% of the Bank's total voting rights. This information is detailed below and updated on the Bank's website www.grupobancosabadell.com. The members of the Board of Directors do not currently hold voting rights through financial instruments.

The directors' position in share capital is detailed below:

Name of director	Voting rights attributed to the shares (%)		Voting rights through financial instruments (%)		Total voting rights (%)	Voting rights that may be transferred through financial instruments (%)	
	Direct	Indirect	Direct	Indirect		Direct	Indirect
Josep Oliu Creus	0.08	0.08	0.00	0.00	0.16	0.00	0.00
Pedro Fontana García	0.00	0.00	0.00	0.00	0.00	0.00	0.00
César González-Bueno Mayer Wittgenstein	0.04	0.00	0.00	0.00	0.04	0.00	0.00
Aurora Catá Sala	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Ana Colonques García-Planas	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Lluís Deulofeu Fuguet	0.00	0.00	0.00	0.00	0.00	0.00	0.00
María José García Beato	0.02	0.00	0.00	0.00	0.02	0.00	0.00
Mireya Giné Torrens	0.00	0.00	0.00	0.00	0.00	0.00	0.00
María Gloria Hernández García	0.00	0.00	0.00	0.00	0.00	0.00	0.00
George Donald Johnston III	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Margarita Salvans Puigbò	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Manuel Valls Morató	0.00	0.00	0.00	0.00	0.00	0.00	0.00
David Vegara Figueras	0.01	0.00	0.00	0.00	0.01	0.00	0.00
Pedro Viñolas Serra	0.00	0.00	0.00	0.00	0.00	0.00	0.00

1.4. Own shares (A.9 and A.10)

The Bank is empowered to acquire own shares by a resolution adopted by the Ordinary General Meeting of Shareholders on 10 April 2024, under item six on the agenda, which revoked the power granted by motion eight adopted by the General Meeting of Shareholders on 23 March 2023 with respect to the part not yet executed (that power was in force through 10 April 2024 in the same terms as the current authorization) and authorized Banco Sabadell, within a maximum period of five years as from the date of the resolution, so that, directly or through subsidiaries, subject to obtaining prior authorization from the European Central Bank, it may acquire, at any time and as often as it sees fit, shares of Banco Sabadell by any of the means admitted by law, including against profit for the year and/or unrestricted reserves, and that it may subsequently dispose of or cancel any shares thus acquired or deliver them to employees or directors of Banco Sabadell as part of their remuneration or as a result of the exercise of stock options which they hold, all in accordance with the provisions of articles 146, 509 and concordant articles of the Capital Companies Law.

The limits and requirements for such acquisitions are as follows:

- The par value of the shares thus acquired, directly or indirectly, in addition to any shares already held by the Bank and its subsidiaries, may not exceed, at any time, the legal limit established from time to time by the legislation in force (currently ten per cent of share capital), subject in all cases to the limits for acquisition of own shares established by the stock market regulators in the markets in which Banco Sabadell shares are listed.
- The acquisition, plus any shares previously acquired by Banco Sabadell (or a person acting in their own name but on the Bank's behalf) and held by it, must not lead to net equity being less than the amount of share capital plus legal reserves and reserves that are designated as restricted under the Articles of Association.
- The shares acquired must have been fully paid.
- The acquisition price must be no less than par value and no greater than 20 per cent above the stock market price or any other price whereby the shares may be valued as of the date of their acquisition. All acquisitions of own shares must be made in accordance with general stock market rules and regulations.

At 2025 year-end, Banco Sabadell directly held 25,705.644 own shares, representing 0.512% of share capital. The Bank reported the following changes in treasury stock to the CNMV:

Transaction date	Total number of direct shares	Total number of indirect shares	Total % of share capital
27/02/2025	30,923,691	0	0.574
15/04/2025	80,941,655	0	1.502
12/05/2025	135,512,362	0	2.515
02/06/2025	189,925,725	0	3.525
23/06/2025	246,735,609	0	4.580
23/06/2025	147,274,789	0	2.785
09/07/2025	202,574,283	0	3.831
23/07/2025	256,483,513	0	4.850
29/08/2025	26,291,678	0	0.523

Share Repurchase Programme

On 10 April 2024, the Ordinary General Meeting of Shareholders of Banco Sabadell approved a resolution to reduce the share capital by the nominal amount of own shares that may be acquired by Banco Sabadell under the share repurchase programme with a charge to 2023 profit, up to at most €340 million.

As a continuation, on 25 April 2024, Banco Sabadell released a regulatory disclosure of Inside Information, with CNMV registration number 2.203, setting out the terms and announcing the commencement of the programme to repurchase own shares approved by the Board of Directors on 24 April 2024, in compliance with the provisions of Article 5 of Regulation (EU) No. 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse and Commission Delegated Regulation (EU) 2016/1052, of 8 March 2016.

On 13 May 2024, in response to a request from the CNMV received on that same date, Banco Sabadell released a regulatory disclosure of Other Relevant Information with CNMV registration number 28.561 in which it announced the temporary suspension of the aforementioned share buyback programme due to the publication of the preliminary

announcement of the voluntary public tender offer made by BBVA for all of the shares representing the capital stock of Banco Sabadell.

Transactions under the buyback programme had been interrupted before market opening on 9 May 2024; the amount paid for the shares purchased under the repurchase programme up to and including 8 May 2024 amounted to €92,864,152.55, i.e. approximately 27.31% of the maximum monetary amount of the repurchase programme, with the result that approximately 72.69% of the aforementioned maximum amount was unused.

At a meeting on 29 January 2025, the bank's Board of Directors resolved to partially execute the capital reduction resolution approved by the General Meeting of Shareholders on 10 April 2024 in the amount of €6,566,420.625, by redeeming the 52,531,365 shares acquired under the aforementioned buyback programme up until it was suspended. That resolution provided for the possibility of not executing it or executing it only partially in the light of unforeseen circumstances. The public instrument of capital reduction was registered in the Barcelona Commercial Registry on 27 February 2025, thereby executing the reduction and delisting the cancelled shares.

The Ordinary General Meeting of Shareholders on 20 March 2025 resolved, after obtaining prior authorisation from the competent authority, to reactivate the share buyback programme originally approved for an effective amount of up to €340 million by the Board of Directors on 24 April 2024, as mentioned above. That General Meeting of Shareholders resolved to approve the aforementioned share buyback programme for an amount of €247 million (the reactivated buyback programme).

Furthermore, after obtaining prior authorisation from the competent authority, that same Ordinary General Meeting of Shareholders on 20 March 2025 approved the creation of another share buyback programme for an amount of €755 million, in line with the commitment made by Banco Sabadell's Board of Directors to distribute capital in excess of a 13% CET1 ratio to shareholders².

On 28 March 2025, Banco Sabadell released a regulatory disclosure of Inside Information, with CNMV registration number 33.739, announcing the commencement of the programme to repurchase own shares approved by the Board of Directors on 31 March 2025, in compliance with the provisions of Article 5 of Regulation (EU) No. 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse and Commission Delegated Regulation (EU) 2016/1052, of 8 March 2016.

On 8 May 2025, Banco Sabadell disclosed, under the heading of Other Relevant Information, that it had completed the reactivated share buyback programme, having reached the aforementioned maximum monetary amount of €247 million through acquiring 99,460,820 own shares with a par value of €0.125 each, representing approximately 1.85% of Banco Sabadell's share capital.

On 29 May 2025, the Board of Directors of Banco Sabadell resolved to reduce the bank's share capital by €12,432,602.50 through the redemption, charged to unrestricted reserves, of all the own shares acquired under the reactivated buyback programme mentioned in the previous paragraph. This reduction was approved under the powers delegated to the Board of Directors in the share capital reduction agreement approved by the aforementioned Ordinary General Meeting of Shareholders on 20 March 2025.

The public instrument of capital reduction was registered in the Barcelona Commercial Registry on 23 June 2025, thereby executing the reduction and delisting the cancelled shares.

On 8 May 2025, Banco Sabadell announced, the form of an Other Relevant Information disclosure, registered with the CNMV under number 34.672, in accordance with the provisions of Article 5 of Regulation (EU)

² Applying the regulatory timetable for the output floor, 13% is established in terms of fully-loaded CET1.

No 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse and Delegated Regulation (EU) No 2016/1052 of the Commission of 8 March 2016, the terms and conditions and the start on 9 May 2025 of the other share buyback programme approved by the aforementioned Ordinary General Meeting of Shareholders on 20 March 2025 for a maximum amount of €755 million, with the aim of reducing Banco Sabadell's share capital through the cancellation of own shares acquired in execution of the capital reduction approved by the same Ordinary General Meeting of Shareholders, contributing to the remuneration of Banco Sabadell shareholders through an increase in earnings per share, inherent to the reduction in the number of shares.

Starting on 12 May 2025, Banco Sabadell reported on a weekly basis, through Other Relevant Information disclosures, the mandatory information relating to transactions involving own shares carried out in execution of the aforementioned buyback programme, as well as the amount paid for the shares purchased, until 4 August 2025, when Banco Sabadell announced, in an Other Relevant Information disclosure, the completion of the buyback programme upon reaching the aforementioned maximum cash amount of €755 million, having acquired 264,551,530 own shares with a par value of €0.125 each, representing approximately 5.003% of Banco Sabadell's share capital.

On 5 August 2025, the Board of Directors of Banco resolved to reduce the bank's share capital by €33,068,941.25 through the cancellation, against unrestricted reserves, of all the own shares acquired under the buyback programme mentioned in the previous paragraph. This reduction was approved under the powers delegated to the Board of Directors in the share capital reduction agreement approved by the aforementioned Ordinary General Meeting of Shareholders on 20 March 2025.

Following this latest capital reduction, the resulting share capital was €627,959,716.50, represented by 5,023,677,732 shares with a par value of €0.125 each, all belonging to the same class and series.

The public instrument of capital reduction was registered in the Barcelona Commercial Registry on 29 August 2025, thereby executing the reduction and delisting the cancelled shares.

1.5. Estimated free float (A.11)

At 2025 year-end, the estimated free float, i.e. the percentage of share capital not held by significant shareholders, members of the Board of Directors or the Company itself as treasury stock, was 83.26%.

1.6. Transferability and exercise of voting rights (A.12, A.13 and A.14)

There are no restrictions on the free transferability of the Bank's shares such as to hamper the attainment of control of the Bank through the acquisition of its shares in the market. The only existing restrictions are those established in Spanish law applying to all credit institutions.

Specifically, Law 10/2014, of 26, June, on the Regulation, Supervision and Solvency of Credit Institutions, establishes that in any acquisition of at least 10 percent of the capital or of the voting rights, or one which, without attaining that percentage, enables significant influence to be exerted over the institution, as well as any increases such as to exceed 20, 30 or 50 per cent, or to grant control of the institution, the purchaser must give advance notice to the Bank of Spain, which will process the request, to be approved or denied by the European Central Bank. The reduction of a stake below those thresholds must be notified by the seller to the Bank of Spain.

The General Meeting of Shareholders has not adopted neutralization measures against takeover bids and no securities have been issued that are not traded on a regulated market in the European Union.





2. Shareholders and General Meeting of Shareholders (B)

2.1 Accionistas

2.1.1 Policy on communication and contact with shareholders, investors and proxy advisors

The relationship with shareholders, investors, proxy advisors and other stakeholders is a fundamental pillar of Banco Sabadell's communication strategy to promote transparency, build trust and, at all times, safeguard the legitimate interests of shareholders, investors and proxy advisors, as well as any other stakeholder of Banco Sabadell.

The Policy on Communication and Contact with Shareholders, Investors and Proxy Advisors establishes the following principles:

- **Involvement of the Board of Directors and senior management**
They have the ultimate responsibility for defining strategies for communicating with shareholders, investors, financial analysts and proxy advisors.
- **Diligence and transparency**
The Bank behaves with the utmost diligence and transparency in all its communications and relations with shareholders, investors, financial analysts and proxy advisors, in order to minimise the risks of conflicts of interest and ensure that information is distributed in a timely, homogeneous and transparent manner.
- **Integrity, accuracy and consistency of information**
The Bank guarantees the integrity, accuracy and consistency of the information disclosed to shareholders, investors and proxy advisors. To this end, it ensures that the information disclosed is complete, honest, consistent with reality and coherent so as to contribute to transparency vis-à-vis the market, build reputational value and strengthen the corporate identity.
- **Equal treatment and diversity**
The Bank ensures equal treatment of shareholders, investors, financial analysts and proxy advisors, guaranteeing that all parties have the same rights and can exercise them in an analogous way without discrimination. The Bank also ensures the uniform distribution of information to all market participants. In addition, the Bank considers the different information needs of its stakeholders and adjusts the content, form and channels of communication to meet these needs while fully complying with the applicable regulations in all cases.
- **Engagement and promoting participation**
The Bank encourages dialogue with shareholders, investors, financial analysts and proxy advisors, while promoting their participation. To this end, it facilitates the exercise of stakeholders' rights in order to involve them effectively and sustainably. The Bank also allows shareholders to cooperate among themselves. For this purpose, the Bank establishes and enables the appropriate communication mechanisms to detect its stakeholders' concerns, suggestions and needs. It also provides shareholders with all the information needed for the proper exercise of their rights.
- **Compliance with internal and external regulations**
The Bank ensures that its communications always comply with current external and internal regulations. To this end, it ensures the

proper application of the applicable current legal and regulatory requirements and the internal policies and procedures. It also complies with regulatory recommendations and guidelines in order to implement best practices in this area.

The Policy also details:

- The critical management parameters applicable to communication with shareholders, investors, financial analysts and proxy advisors, as well as any other Banco Sabadell stakeholder group.
- The governance and organizational structure, establishing the roles and responsibilities of the Board of Directors, the Board committees and internal committees, as well as the areas and units involved.
- The reporting, communication, contact and participation channels to safeguard the above principles.

2.1.2 Shareholder participation in 2025

The Policy on communication and contact with shareholders, investors and proxy advisors details the following channels through which shareholders may exercise their rights to be informed and to participate in Banco Sabadell activities and events.

- **Corporate website**

The Group has a corporate website (www.grupobancosabadell.com) which contains all the public information about the Group for use by shareholders, investors, financial analysts, proxy advisors and other stakeholders. In order to comply with the principle of transparency, the Bank ensures that the information posted on the corporate website is clear, correct and truthful; to this end, the information is updated constantly and published in Spanish, Catalan and English.

- **CNMV website**

In addition to the corporate website, as a listed company, the Bank releases, via the CNMV website, inside and other relevant information disclosures, regular financial reporting, issue prospectuses and all other information that is required by the applicable regulations or that may be of general interest to the Bank's stakeholders.

- **Earnings webcasts**

The Bank streams quarterly earnings presentations and other communications of interest to the market and makes them readily accessible to shareholders, financial analysts, proxy advisors and other stakeholders. Webcasts are also available after the fact on the corporate website. In the case of live presentations, systems are provided for participants to submit questions to the speakers or representatives of the Group, either live or by e-mail.

- **Social media**

Aware of the impact and importance of new information technologies and communication channels through the internet, the Bank promotes an active presence in social media, where, without detriment to compliance with its legal obligations, and in accordance with the criteria and requirements established by the CNMV (Communiqué dated 8/10/2020), it seeks to disseminate information on the Group's progress and establish new forms of communication with shareholders and stakeholders who regularly use these media to obtain information on matters of interest to them.

- **Means of contact with shareholders and investors**

In order to facilitate open, transparent communication between shareholders and the Bank, a telephone line (+34 93 728 88 82) and an electronic mailbox (accionista@bancsabadell.com) have been established to provide shareholders with personalised attention

when handling and responding to requests for information, clarifications and questions.

Additionally, in order to ensure proper consistent and coherent communication with the market³ at all times, there is a telephone line +34 91 321 73 73 and an e-mail address (investorrelations@bancsabadell.com) to enable institutional investors to submit requests and suggestions.

— **Communications within the framework of the General Meeting of Shareholders**

One of the main mechanisms for shareholder participation is the General Meeting of Shareholders. The Bank provides all shareholders with a range of resources to enable them to participate in and attend the Meeting, such as the ability to grant proxy, vote and attend by means of distance communication through the corporate website www.grupbancsabadell.com using an electronic national ID document or a recognized electronic certificate, through the Banco Sabadell Group remote banking services (BS Online and BS Móvil) for those shareholders who use this service, and via the branch network.

As an essential part of the General Meeting of Shareholders, the Bank provides shareholders with the information that they need to decide on the matters submitted for their consideration and publishes this information in detail sufficiently in advance. Moreover, from the time notice of the General Meeting of Shareholders is given until the meeting is held, the Electronic Shareholders' Forum is enabled on the website and is accessible to Banco Sabadell shareholders and to any shareholder associations formed in accordance with current legislation solely for the purpose of communicating among themselves in connection with the General Meeting of Shareholders.

— **Proxy advisors and investors**

The Bank maintains contact with the most important proxy advisors in the market so that their recommendations can be based on a detailed knowledge of the Group.

To this end, the Bank implements best practices and recommendations in the area of corporate governance. It conducts corporate governance roadshows with proxy advisors and investors, and holds meetings with investors' ESG departments.

— **Group and individual meetings**

Informational meetings (roadshows, etc.) are organized periodically, in which representatives of the Bank meet with shareholders, investors, financial analysts and proxy advisors to present the Group's progress and other matters of interest that help to clarify aspects of public information, listen to their feedback and provide detailed answers to their questions.

— **Specialized industry events**

The Bank attends specialized international industry conferences, at which it makes presentations and meets with shareholders and investors in order to create a climate of dialogue in which to inform them about the Bank's performance and respond to specific queries about its public disclosures.

— **Capital Market Days**

The Bank arranges meetings with shareholders, investors and analysts to discuss the Group's business and strategic plans and those of its subsidiaries.

— **Meetings with retail shareholders**

The Bank organises meetings with retail shareholders at which representatives of the Bank make a presentation that usually includes an introduction to the macroeconomic situation and a

³ This refers to the Bank's relationship with financial analysts, investors, managers and custodians of Banco Sabadell shares, and proxy advisors, among others.

review of the Bank's results, as well as a question and answer session.

— **Means of contact with shareholders and investors**

In addition to the aforementioned channels, the Bank has other means of communication and direct contact with its shareholders and investors, such as the Group's branch network.



2.1.3 Shareholder remuneration policy

The economic rights of all shareholders include the right to share in the Institution's profits by receiving dividends and any other distributions (issue premium refunds, repayment of contributions, etc.) that the Institution's competent bodies (General Meeting of Shareholders, based on a proposal by the Board of Directors, or the latter in the case of payment of interim dividends) resolve to distribute among the shareholders.

Pursuant to Article 529 ter of the Capital Companies Law, the Boards of Directors of capital companies have the power, which can not be delegated, to approve the dividend policy in order to establish a transparent and predictable framework for decisions regarding shareholder remuneration. Banco Sabadell's policy in this respect aims to reconcile maintaining appropriate levels of capital and liquidity at all times such as to have a comfortable margin over the applicable requirements, while offering shareholders attractive remuneration in line with earnings performance.

The CNMV requires that listed companies make their shareholder remuneration policy available to shareholders and investors. Both the CNMV and the European Securities Markets Authority, as well as the stock market regulations, stress the need to disclose, transparently and with sufficient advance notice, any decisions that are adopted or submitted for approval by the competent bodies in this area in order to contribute to proper price formation of shares and derivative financial instruments in the market.

To this end, Banco Sabadell has a shareholder remuneration policy approved by the Board of Directors at a meeting on 6 February 2025, which was submitted for review and approval by the General Meeting of Shareholders on 20 March 2025, as item four on the agenda, achieving 99.87% of votes in favour. It should also be noted that the motion to adopt the new Shareholder Remuneration Policy was subject to the regulations governing public takeover bids (specifically, Article 114 of Law 6/2023 of 17 March on Securities Markets and Investment Services, and Article 28 of the Royal Decree on Takeover Bids) as a result of the voluntary takeover bid made by Banco Bilbao Vizcaya Argentaria, S.A. for all the shares representing the share capital of Banco Sabadell, (hereinafter, the Offer), which was announced on 9 May 2024 (disclosure of inside information with registration number 2.242).

Accordingly, the motion was submitted for approval by the General Meeting of Shareholders in accordance with the provisions of Article 28.1.b) and d) of the Royal Decree on Takeover Bids. As can be inferred from the reasons that led the Bank's Board of Directors to submit the motion to the General Meeting of Shareholders (set out in the Board of Directors' explanatory report on the motion that was made available to shareholders), insofar as, in accordance with the aforementioned legislation, the new shareholder remuneration policy was a departure from the usual policy of distributing dividends to shareholders, the motions submitted to the General Meeting of Shareholders (convened as an Ordinary General Meeting of Shareholders) complied with the formal requirements of Article 28.4 of the Royal Decree on Takeover Bids.

Once the period referred to in Article 28.1 of the Royal Decree on Takeover Bids has concluded, the Board of Directors of Banco Sabadell may amend the Shareholder Remuneration Policy, in accordance with the Capital Companies Act, without the need for approval by the General Meeting of Shareholders.

The purpose of the Policy is to establish the principles that will govern the decisions regarding shareholder remuneration that the Board of Directors submits to the General Meeting of Shareholders for approval or that the latter adopts directly in the exercise of its powers regarding the distribution of total remuneration.

The principles governing shareholder remuneration comply with current legislation, Banco Sabadell's corporate governance rules and the good governance recommendations and principles adopted by the Bank,

particularly those contained in the Good Governance Code for listed companies approved by the CNMV (June 2020 revision). They must also conform to the prudential and supervisory framework applicable to financial institutions and the recommendations and considerations by national and European supervisory authorities.

These principles also take account of best practices observed by domestic listed companies and by financial institutions listed in Europe and in the main capital markets.

Accordingly, the Bank's shareholder remuneration and dividend distribution decisions must comply with the following principles:

- Conformity to current legislation
- Proportionality to the number of shares
- Equal treatment
- Transparency
- Link to profit
- Solvency and sustainability over time
- Value creation and profit enhancement
- Shareholder return
- Observed best practices

The Policy sets out the essential parameters established as a framework for executing this proposal. These are:

- The annual amount of shareholder remuneration
- Remuneration payment formulas
- Frequency of remuneration payments

As this right is common to all of the Bank's shareholders, in line with the provisions of Banco Sabadell's Policy on Communication and Contact with Shareholders, Investors and Proxy Advisors, Banco Sabadell's Shareholder Remuneration Policy is published on the Bank's corporate website (www.grupobancosabadell.com).

Likewise, any decision or proposal regarding shareholder remuneration that is adopted or made by the Board of Directors must be notified to the CNMV in the form of a regulatory disclosure of inside information in advance of the date of payment of the remuneration provided for in the applicable regulations.

On 1 February 2024, Banco Sabadell communicated to the market its intention to distribute to shareholders any capital in excess of a CET1 ratio of 13%⁴.

As communicated to the market in the press release attached to the disclosure of Inside Information dated 6 May 2024, with CNMV registration number 2.234, the Board of Directors, at a meeting on that same date, as part of its firm commitment to shareholder value creation and backed by the Bank's business plan and solid capital generation, reiterated its commitment to distribute to shareholders, on a recurring basis, any capital in excess of a CET1 ratio of 13%⁴.

Subsequently, at a meeting on 22 July 2024, in compliance with the Shareholder Remuneration Policy, the Board of Directors of Banco Sabadell resolved to set the percentage of profit to be distributed to shareholders, i.e. the Group's pay-out, at 60% of the Group's attributable net profit. This level of pay-out is at the high end of the range established in the Group's shareholder remuneration policy. All of this was communicated to the market by means of an Inside Information disclosure with CNMV registration number 2.322 on 23 July 2024.

With regard to shareholder remuneration for 2025, at a meeting on 23 July 2025, and in compliance with the shareholder remuneration policy, the Board of Directors resolved to distribute a first interim dividend out of 2025 earnings in the amount of 7 euro cent (gross) per share, which was paid in cash on 29 August.

⁴ Applying the regulatory timetable for the output floor, 13% is established in terms of fully-loaded CET1.

Additionally, the Extraordinary General Meeting of Shareholders at 13.00 on 6 August 2025 approved an extraordinary cash dividend of 50 euro cent (gross) per share charged to unrestricted voluntary reserves, conditional upon the sale of TSB Banking Group plc and payable on the last business day of the month following receipt of the sale price.

At the Board of Directors' meeting on 30 September 2025, it was resolved to distribute a second 2025 interim dividend amounting to 7 euro cent (gross) per share, which was paid in cash on 29 December 2025.

2.2. General Meeting of Shareholders (B.1, B.2, B.3, B.6, B.7 and B.8)

2.2.1 General Meeting of Shareholders Regulation

The General Meeting of Shareholders is the Bank's main governing body, where the shareholders adopt resolutions on matters attributed to them by the law, the Articles of Association and the General Meeting Regulations, and those business decisions that the Board of Directors considers of importance for the future of the Bank and the corporate interests.

The terms of reference and the basic rules for the conduct of the Banco Sabadell General Meeting of Shareholders, and the system for giving notice and convening meetings and adopting decisions, are set out in the Articles of Association and in the Regulation of the General Meeting of Shareholders, which safeguard shareholders' rights and transparency; the system of quora does not differ from that provided in the Capital Companies Law.

This same criterion is applicable to any amendment of the Articles of Association, which is governed by the same principles as established in the Capital Companies Law, both with regard to the requirements for amendment and the required quorum. Additionally, in the cases defined by law, amendments of the Articles of Association require the authorization of the supervisor exercising the powers assigned to it by article 10 of Royal Decree 84/2015, of 13 February, implementing Law 10/2014, of 26 June, on Regulation, Supervision and Solvency of Credit Institutions, without prejudice to the functions attributed to the European Central Bank in accordance with the provisions of Council Regulation (EU) No 1024/2013 of 15 October 2013 conferring specific tasks on the European Central Bank concerning policies relating to the prudential supervision of credit institutions.

2.2.2 Right to attend and vote at General Meetings of Shareholders

Shareholders are entitled to attend and vote at the General Meetings of Shareholders and to challenge corporate resolutions in accordance with the provisions of Article 93 of the Capital Companies Law and Article 9 of the Articles of Association of Banco Sabadell, as described below.

Pursuant to Article 37 of the Company's Articles of Association, shareholders whose shares are registered in the Bank's register of shares at least five days in advance of the date of a General Meeting of Shareholders are entitled to attend the meeting.

In accordance with article 38 of the Articles of Association, in order to attend and vote at a General Meeting, shareholders must accredit that they possess, or hold proxies for, one thousand (1,000) shares. Shareholders holding less than that minimum amount of shares may

group together to constitute the minimum and grant proxy to any one of them, or to another person, who need not be a shareholder, that is able to attend the Meeting in accordance with the provisions of Article 38. Shareholders have one vote per thousand (1,000) shares.

The Articles of Association and the Regulation of the General Meeting of Shareholders provide for the possibility of attending the meeting remotely using means of distance communication and of voting remotely by any means, even exclusively by remote means where permitted by law, in which case, and without prejudice to the terms of the Regulation of the General Meeting of Shareholders, the Board of Directors must expressly resolve to authorize the necessary systems and procedures to enable remote attendance and voting at the General Meeting of Shareholders, and this resolution must be expressly disclosed in the notice of the General Meeting of Shareholders in question.

2.2.3 Information on General Meetings of Shareholder

The information about General Meetings is available on the Group's corporate website (www.grupobancosabadell.com) directly in the section entitled "Shareholders and investors". Additionally, the information about corporate governance is available on the website directly in the section entitled "Corporate governance and remuneration policy".

2.3. 2025 Ordinary General Meeting of Shareholders (B.4 and B.5)

At a meeting on 6 February 2025, the Board of Directors of Banco Sabadell resolved, in accordance with the provisions of the Articles of Association and the Regulation of the General Meeting of Shareholders, to give notice of the Ordinary General Meeting of Shareholders to be held on 20 March 2025, at second call, and to enable voting and the granting of proxies by remote means prior to the Meeting.

On that same date, 6 February 2025, the Board of Directors resolved to enable the necessary systems and procedures for shareholders and their proxies to be able to attend using means of distance communication that allow real-time connection with the venue where the meeting is held, and to speak and vote using the systems and procedures provided for this purpose.

Banco Sabadell's Ordinary General Meeting of Shareholders was certified as a "sustainable event" due to sufficiently exceeding the requirements for certification and passing the preliminary evaluation process and the on-site audit established by Eventsost, an end-to-end platform for certifying event sustainability. The certification is based on the sustainability standards for events contemplated in the Eventsost sustainable events certification system, and on alignment with the Sustainable Development Goals of the UN Agenda 2030 applied to event production.

The Ordinary General Meeting was classified as a sustainable event by taking account of both the interests of the groups affected by the event (stakeholders) and the requirements in relation to:

- Respect for the environment
- Social integrity of the venue
- Accessibility
- Inclusiveness
- Economic sustainability, i.e. that the event has an economic benefit
- Positive legacy

The sustainability certification concludes that the estimated carbon footprint of the Shareholders' Meeting was reduced by 87.2% with respect to the 2024 Meeting.

Additionally, for the 2025 Ordinary General Meeting of Shareholders, an external consultant was engaged to verify the procedure for the preparation and holding of the Meeting, in order to assess compliance with the legal and corporate governance requirements for properly holding the 2025 Ordinary General Meeting of Shareholders in accordance with the law and the Bank's internal regulatory framework, as well as the non-existence of material deficiencies in the procedure related to the General Meeting of Shareholders and the assurance of the design of controls and procedures that guarantee the appropriate exercise by the shareholders of all their rights, and their proper application in the Ordinary General Meeting of Shareholders of Banco Sabadell.

The external consultant performed a detailed analysis of each of the time periods addressed by the review (Phase I – before the Meeting, Phase II – Meeting, and Phase III – after the Meeting), and concluded that, from a technical, procedural and legal point of view, the requirements, internal procedures and applicable regulations were complied with in the three phases analyzed.

In line with best practices in corporate governance, Banco Sabadell transmits the entire General Meeting of Shareholders live via webcast on the corporate website.

Attendance at the Ordinary General Meeting of Shareholders in recent years, and the percentages by which the resolutions were



adopted, are published on the corporate website www.grupobancosabadell.com. Attendance figures for the last three Ordinary General Meetings of Shareholders are shown below, including a breakdown of shareholders who attended and who voted using means of distance communication. In Ordinary General Meetings of Shareholders in the reporting years, there was no agenda item that was not approved by the shareholders:

Date of shareholders' meeting	% in attendance in person and by distance means	% represented by proxy	% votes cast by distance means		Total
			E-voting	Other	
20/03/2025	0.93	68.16	0.63	0.56	70.28
Of which free float:	0.76	61.67	0.63	0.56	63.62
10/04/2024	0.23	60.40	0.50	0.66	61.79
Of which free float:	0.07	56.79	0.50	0.66	58.02
23/03/2023	0.26	60.68	0.44	0.54	61.92
Of which free float:	0.10	60.66	0.44	0.54	61.74

The significant shareholder who was also a member of the Board of Directors was unable to attend the 2025 Ordinary General Meeting of Shareholders for just cause, and appointed a proxy. The estimated percentages of free float represented at the 2025 General Meeting of Shareholders as shown in the table above do not include the shareholding of that significant shareholder who was represented on the Board at the time. Nevertheless, the estimated percentages of free float may include other significant holdings deposited at international custodians that held proxies for the General Meeting of Shareholders.

2.3.1 Extraordinary General Meetings

At a meeting on 3 July 2025, the Board of Directors of Banco Sabadell resolved, in accordance with the provisions of the Articles of Association and the Regulation of the General Meeting of Shareholders, to give notice of two General Meetings of Shareholders to be held on 6 August 2025, at second call, the first one at 10:00 and the second one at 13:00.

At the first of these meetings, shareholders were asked to authorise the disposal of the entire share capital of the Banco Sabadell subsidiary TSB Banking Group plc and other capital instruments and securities issued by the latter, while at the second meeting, shareholders were asked to approve an extraordinary cash dividend of 50 euro cent (gross) per share charged to unrestricted voluntary reserves, conditional upon the sale of TSB Banking Group plc and payable on the last business day of the month following receipt of the sale price. Both motions were approved by a very large majority of shareholders: 99.578% in the case of the motion to sell TSB Banking Group plc and 99.656% in the case of the motion to approve the extraordinary dividend.

At both Meetings, as at the Ordinary Meeting on 20 March 2025, it was resolved to allow votes to be cast and proxies to be granted by distance means in advance of the Meeting.

The Board of Directors also resolved to enable the necessary systems and procedures for shareholders and their proxies to be able to attend using means of distance communication that allow real-time connection with the venue where the meeting is held, and to speak and vote using the systems and procedures provided for this purpose.

The two Extraordinary General Meetings were also certified as "Sustainable Events", in accordance with the same sustainability standards and criteria referred to above in connection with the 2025 Ordinary General Meeting, and they successfully passed the on-site assessment and audit established by Eventsoft.



Attendance figures for the Extraordinary General Meetings of Shareholders are shown below, including a breakdown of shareholders who attended and who voted using means of distance communication.

Date of shareholders' meeting	% in attendance in person and by distance means	% represented by proxy	% votes cast by distance means		Total
			E-voting	Other	
06/08/2025 10:00	0.76	68.12	0.93	1.3	71.11
Of which free float:	0.58	60.87	0.93	1.3	63.68
06/08/2025 13:00	0.75	66.50	0.74	1.36	69.35
Of which free float:	0.57	59.25	0.74	1.36	61.92



3. Board of Directors

(C) (C.1.15)

With the exception of matters falling within the sole remit of the Shareholders' Meeting, the Board of Directors is the highest decision-making body in the Bank as, under the law and the Articles of Association, it is entrusted with administering and representing the Bank. The Board of Directors acts mainly as an instrument of supervision and oversight, and it delegates the management of ordinary business matters to the Chief Executive Officer.

The Board of Directors is subject to well-defined, transparent rules of governance, particularly the Articles of Association and the Board's own terms of reference, and it conforms to best practices in the area of corporate governance.



3.1. Composition of the Board (C.1.1, C.1.2, C.1.8 and C.1.29)

At 31 December 2025, the Board comprised 14 members, as follows:

Name of director	Director category	Board committees	Board position	Date of first appointment	Date of last appointment	Appointment procedure
Josep Oliu Creus	Other external	• S&SC (C)	Chairman	29/03/1990	23/03/2023	General Meeting decision
Pedro Fontana García	Independent	• CrDC (C) • A&CGC (C) • S&SC (M)	Deputy Chairman	27/07/2017	24/03/2022	General Meeting decision
César González-Bueno Mayer Wittgenstein	Executive	• S&SC (M)* • CrDC (M)	Chief Executive Officer	17/12/2020	20/03/2025	General Meeting decision
Aurora Catá Sala	Independent	• A&CGC (M) • RC (M)	Director	29/01/2015	23/03/2023	General Meeting decision
Ana Colonques García-Planas	Independent	• A&CC (M) • A&CGC (M) • RemC (M)	Director	10/04/2024	10/04/2024	General Meeting decision
Lluís Deulofeu Fuguat	Independent	• CrDC (M) • S&SC (M)	Director	28/07/2021	24/03/2022	General Meeting decision
María José García Beato	Other external	• A&CGC (M) • S&SC (M)	Director	24/05/2018	23/03/2023	General Meeting decision
Mireya Giné Torrens	Independent	• RemC (C) • CrDC (M)	Director	26/03/2020	10/04/2024	General Meeting decision
María Gloria Hernández García	Independent	• A&CC (M) • RC (M)	Director	20/03/2025	20/03/2025	General Meeting decision
George Donald Johnston III	Independent	• RC (C) • S&SC (M)	Lead Independent Director	25/05/2017	24/03/2022	General Meeting decision
Margarita Salvans Puigbò	Independent	• A&CC (M) • RemC (M)	Director	20/03/2025	20/03/2025	General Meeting decision
Manuel Valls Morató	Independent	• A&CC (C) • RC (M)	Director	22/09/2016	20/03/2025	General Meeting decision
David Vegara Figueras	Executive		Director	28/05/2015	23/03/2023	General Meeting decision
Pedro Viñolas Serra	Independent	• CrDC (M) • A&CGC (M)	Director	23/03/2023	23/03/2023	General Meeting decision

* Member solely for matters of strategy.

Board of Directors Committees

- **S&SC** Strategy and Sustainability Committee
- **CrDC** Credit Delegated Committee
- **A&CC** Audit and Control Committee
- **A&CGC** Appointments and Corporate Governance Committee
- **RemC** Remuneration Committee
- **RC** Risk Committee

C: Chairman

M: Member

11/15

Directors according to Articles of Association

15

Directors established by the General Meeting of Shareholders

14

Members of the Board of Directors

Of the fourteen members of the Board of Directors, two are executive directors (14.28% of the total Board) and twelve are non-executive directors: ten independent (71.42% of the total Board) and two other external directors (14.28% of the total Board).

14

Members of the Board of Directors

1

Non-executive chairman (Other external)

2

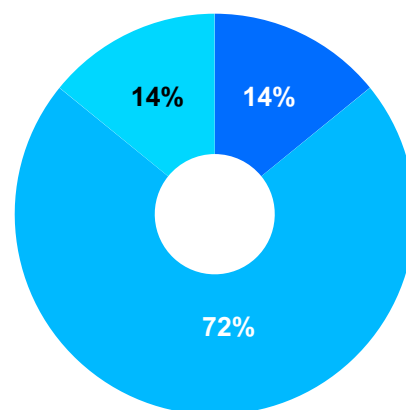
Executive directors

10

Independent directors

1

Other external director



Executive directors
Independent
Other external

Mr. Miquel Roca i Junyent, who is not a director, has been Secretary of the Board since 13 April 2000. Mr. Gonzalo Barettino Coloma, who is not a director, has been Deputy Secretary since 26 March 2021. There have been no appointments of proprietary directors at the proposal of shareholders owning less than 3% of capital.

On 6 February 2025, by means of a letter addressed to the Chairman and all members of the Board of Directors, Ms. Laura González Molero tendered her resignation as an independent director of Banco Sabadell, effective as of the date of the following Ordinary General Meeting of Shareholders, which was held on 20 March 2025. The resignation was duly reported to the CNMV in the form of a regulatory disclosure and it took effect on the date of the 2025 General Meeting of Shareholders, on 20 March 2025.

As Banco Sabadell announced in another regulatory disclosure, the decision to resign came after she received an offer to become chairman of an insurance company, a position that is incompatible with her role as director. Ms. Laura González Molero expressed her satisfaction at having been a member of the Banco Sabadell Board and emphasised that her time on the Board had been a period of significant growth for the Bank and that she was pleased to have participated in the decision-making that had led to this success.

To fill the vacancy for an independent director, the General Meeting of Shareholders on 20 March 2025, on a motion by the Appointments and Corporate Governance Committee, resolved to appoint Ms. Margarita

Salvans Puigbò as an independent director; she accepted the position on 3 June 2025, once the pertinent regulatory authorizations had been received, and she joined the Board of Directors for the first time on 26 June 2025.

Also, on 6 February 2025, during the Board of Directors' meeting on that date, Ms. Alicia Reyes Revuelta announced her decision not to stand for re-appointment as an independent director of Banco Sabadell due to professional commitments, and this took effect as of the date of the next Ordinary General Meeting of Shareholders, which took place on 20 March 2025. The resignation was duly reported to the CNMV in the form of a regulatory disclosure and it took effect on the date of the 2025 General Meeting of Shareholders, on 20 March 2025.

As Banco Sabadell announced in another regulatory disclosure, the decision not to seek re-appointment as an independent director was made due to her professional commitments. Ms. Alicia Reyes Revuelta expressed her gratitude for having been part of the Board of Directors and her pride in having belonged to Banco Sabadell.

To fill the vacancy for an independent director, the General Meeting of Shareholders on 20 March 2025, on a motion by the Appointments and Corporate Governance Committee, resolved to appoint Ms. María Gloria Hernández García as an independent director; she accepted the position on 15 May 2025, once the pertinent regulatory authorizations had been received, and she joined the Board of Directors for the first time on 29 May 2025.

On 27 November 2025, by means of a disclosure of Other Relevant Inform to the CNMV, it was made known that Mr. David Martínez Guzmán, a proprietary director of Banco Sabadell, had resigned as a member of the Board of Directors of Banco Sabadell by means of a letter addressed to the Chairman, which was circulated to all members of the Board of Directors at the meeting held on that day. In his letter, Mr. Martínez Guzmán stated that, during his 12 years on the Board, he had witnessed a transformation of the Bank and expressed his deep gratitude for the resounding success achieved by both the Chairman and the teams who worked for the Bank.

3.2. Director profiles (C.1.3)

The Matrix of competencies and diversity of the members of the Board of Directors, setting out horizontal and sectoral competencies on the Board, is shown below: The Matrix is published in the Banco Sabadell Corporate Governance Framework on the website

www.grupobancosabadell.com, in the section entitled "Corporate governance and remuneration policy".

Industry skills	Chairman	Deputy Chairman	Chief Executive Officer	Director
	Josep Oliu Creus	Pedro Fontana García	César González-Bueno Mayer	Aurora Catá Sala
	Ext.	Ind.	Exec.	Ind.
Retail banking	●	●	●	
Corporate banking	●	●	●	●
Financial and capital markets	●	●	●	●
Insurance	●	●	●	
Other financial skills	●	●	●	●
Accounting and auditing	●	●	●	●
Risk management	●	●	●	
Planning and strategy	●	●	●	●
Governance	●	●	●	●
Risk control	●	●	●	
Prevention of money laundering and terrorist finance	●		●	
Legal	●		●	
Digital and IT (digital transformation)	●		●	●
Human resources, culture, talent and remuneration	●		●	●
Responsible business and sustainability	●		●	
International experience:				
Spain	●	●	●	●
United Kingdom	●		●	
Mexico	●		●	
Other	●	●	●	
Horizontal competencies				
Governing bodies	●	●	●	●
Management of organizations	●	●	●	●
Business experience	●	●	●	●
Government and public policy	●		●	
Consultancy			●	●
Regulators and supervisors	●		●	
Academic	●		●	
Communication and institutional relations	●		●	

Industry skills										
	Ana Colonques García-Planas	Lluís Deulofeu Fuguet	María José García-Beato	Mireya Giné Torrens	María Gloria Hernández García	George Donald Johnston III	Margarita Salvans Puigbò	Manuel Valls Morató	David Vegara Figueras	Pedro Viñolas Serra
	Ind.	Ind.	Ext.	Ind.	Ind.	Lead Ind.	Ind.	Ind.	Exec.	Ind.
Retail banking	●	●	●		●	●	●			
Corporate banking			●		●	●				●
Financial and capital markets	●		●	●	●	●	●		●	●
Insurance					●			●		
Other financial skills	●	●	●	●	●	●	●	●	●	●
Accounting and auditing	●		●	●	●		●	●	●	●
Risk management	●	●	●		●	●	●	●	●	●
Planning and strategy	●	●	●	●	●	●	●	●	●	●
Governance	●	●	●	●	●	●	●		●	●
Risk control	●	●	●		●	●	●	●	●	●
Prevention of money laundering and terrorist finance			●		●	●		●	●	●
Legal			●							
Digital and IT (digital transformation)		●		●					●	
Human resources, culture, talent and remuneration	●	●	●	●		●	●		●	●
Responsible business and sustainability	●		●		●				●	●
International experience:										
Spain	●	●	●	●	●	●	●	●	●	●
United Kingdom			●			●			●	
Mexico					●				●	
Other		●	●	●	●	●	●		●	●
Horizontal competencies										
Governing bodies	●	●	●	●	●	●	●	●	●	●
Management of organizations	●	●	●	●	●	●	●	●	●	●
Business experience	●	●	●	●		●	●	●	●	●
Government and public policy		●	●		●			●	●	
Consultancy		●		●			●		●	
Regulatory and supervisory bodies			●		●			●	●	
Academic			●	●				●	●	●
Communication and institutional relations		●	●		●				●	●

Josep Olliu Creus Non-executive chairman	Profile Banking/ Retail & Corporate Banking/ Finance/ Academic/Business/ International	Degree in Economics from the University of Barcelona and a PhD in Economics from the University of Minnesota (USA). Professor of Economic Theory at the University of Oviedo. Head of Studies and Strategy (1983-1984) and Head of Planning (1984-1987) at Spain's National Institute of Industry (INI). Appointed Director-General Manager of Banco Sabadell in 1990. Chairman of Banco Sabadell since 1999. Non-executive Chairman of Exea Quórum, S.L. and the latter's representative as Chairman of Exea Inversión Empresarial, S.L., representative of Quaestor Ventures, S.A. as Chairman of Exea Ventures, S.L. and director of Puig Brands, S.A. Chairman of the Banco Sabadell Foundation, member of FEDEA (Fundación de Estudios de Economía Aplicada) and member of the Boards of Trustees of the Princess of Asturias Foundation and of the Princess of Girona Foundation.
César González-Bueno Mayer Wittgenstein Chief Executive Officer	Profile Banking/ Retail & Corporate Banking/ Finance/ Regulatory/ International/ Digital and IT (digital transformation)	Dual degrees in Law and Business Administration from ICADE, Madrid, and an MBA from Yale School of Management, Connecticut (USA). Founder and CEO of ING Direct, N.V. Branch in Spain (1998-2010), General Manager for Spain, France, Italy and United Kingdom of ING Direct, N.V. (2004-2010), Regional Head of Europe at ING Bank (2010-2011), CEO of Novagalicia Banco (now Abanca) (2011-2013), CEO of Gulf Bank (2014-2016), CEO of ING Spain and Portugal (2017-2019), and non-executive director of TSB Bank, PLC and TSB Banking Group, PLC which are both part of the Banco Sabadell Group (2020-2021). He is Chairman of Banco Sabadell, S.A., IBM, and of Sabadell Consumer Finance, S.A.U., both part of the Banco Sabadell Group, and member of the Board of Trustees of Ciudad Escuela de los Muchachos Foundation.
David Vega Figueras Director General Manager	Profile Finance/ Risk/ Academic/ Regulatory	A graduate in economics from the Autonomous University of Barcelona, he holds an MA in economics from the London School of Economics. Formerly Secretary of State for the Economy in the Spanish government (2004-2009), Deputy Director of the International Monetary Fund (2010-2012) and Deputy Chief Executive Officer, Banking in the European Stability Mechanism (2012-2015). Member of the Supervisory Board of Hellenic Corporation of Assets and Participations, S.A. (2016-2022), and non-executive director of TSB Bank, PLC and TSB Banking Group, PLC, both of which are part of the Banco Sabadell Group (2020-2022). Associate professor in the Department of Economics, Finance and Accounting at ESADE (2015- 2018). Currently, independent director of Amadeus IT Group, S.A., member of the Board of Trustees of the Pasqual Maragall Foundation, trustee for life of the Gala-Salvador Dalí Foundation, Chairman of the Advisory Board of Roca Junyent, S.L.P., and Chairman of Foro Tertulias Hispano-Británicas.

Pedro Fontana García Deputy Chairman – Independent	Profile Banking/ Retail Banking/ Business	Degree in Business from ESADE (Barcelona) and MBA from Harvard Graduate School of Business Administration, Boston, Massachusetts (USA). Regional Manager of Banco de Comercio (1978-1982), General Manager of Banca Mas Sardá (1983-1988), Chief Executive Officer of NH Hoteles (1989-1990), General Manager of COOB'92 (1990-1993), General Manager of Turisme de Barcelona (1993-1994), Chairman of Banca Catalana (1994-1999), General Manager of BBVA Catalonia (2000-2009), Executive Chairman of AREAS (Elior Group) (2012-2017), Deputy General Manager of Elior Group, S.A. (2017-2018), nominee of EMESA Corporación Empresarial, S.L. on the board of listed company Elior Group, S.A. (2018-2019), and director of Fira Internacional de Barcelona (2011-2023). Currently, independent director of Grupo Indukern, S.L. and of Pax Lux Equityco, S.A., Chairman of My Chef Ristorazione Commerciale, S.P.A., and director of MdF Family Partners, S.A. Honorary President of Asociación para el Progreso de la Dirección - Catalonia Chapter, Chairman of the Board of Trustees of Fundació Privada Cercle d'Economia, trustee of Fundación Barcelona Mobile World Capital. Member of the boards of trustees of Universitat Ramon Llull Fundació, Fundación Grupo Sifu and Fundación Formación y Futuro and of Fundació Acció Solidaria Contra l'Atur.
Aurora Catá Sala Independent Director	Profile Business/ Consultancy/ Finance/ Human resources	Degree in Industrial Engineering (major in Industrial Organization) from the Polytechnic University of Catalonia and MBA and PADE from IESE Barcelona. Formerly CFO of Nissan Motor Ibérica, S.A. (1990-1996), General Manager of RTVE Cataluña (1996-1999), Managing Director of Planeta 2010 (1999-2003), General Manager of Audiovisual Media at Recoletos Grupo de Comunicación (2003-2008), Partner of Seeliger y Conde (2009-2020), independent director of Institut Català de Finances (2014), independent director of Atresmedia Corporación de Medios de Comunicación, S.A. (2009-2021), director of Sabadell Information Systems, S.A., Banco Sabadell's technology subsidiary (2020-2022), Chairman of Barcelona Global (2020-2022), independent director of Atrys Health, S.A. (2021-2024), Deputy Chairman of 37th America's Cup Events, and Trustee of Fundación Cellnex (2023-2025). Formerly held a number of directorships. Currently independent director of Repsol, S.A., member of the Executive Committee of IESE alumni, and General Secretary of Fundación CIDOB.
Ana Colonques García-Planas Independent Director	Profile Business/ Finance/ Auditor	Degree in Business Administration and MBA from ESADE. Auditor at Deloitte (2006-2010), specialized in auditing financial institutions. Risk analyst at Banco Sabadell (2010-2011). Director of Iberdrola España, S.A. (2021-2024). Currently, CFO, executive director and deputy-secretary of Porcelanosa, S.A.U., holding other positions in governing bodies at Porcelanosa Group companies. Independent director of Iberdrola, S.A. and member of the Appointments Committee of Iberdrola, S.A. Member of the Valencia Regional Board of the Asociación Española de Directivos.

Lluís Deulofeu Fuguet Independent Director	Profile Banking/ Retail Banking/ Digital & IT (Digital transformation)/ Business/ Consultancy	Degree in Telecommunications Engineering from the Polytechnic University of Catalonia and has completed the "Finance for Executives" programme at ESADE and the PDG at IESE (Barcelona). Senior Manager at Andersen Consulting (1988-1994), Head of Technical Services & Development of New Projects at Acesa (1994-2001), Chief Technology Officer at La Caixa (2001-2011), Managing Director for Internal Resources and Efficiency at Abertis Infraestructuras (2011-2014). Managing Director of Sanef (2014-2018) and Deputy CEO of Cellnex Telecom (2018-2020). Founder and director of Acesa Telecom (now Cellnex Telecom), and founder and director of Parc Logístic de la Zona Franca, as well as Vice-President of Fundació Catalana de Recerca i Innovació and Chairman of Fundación Cellnex, Trustee of Fundación Barcelona Digital, as well as director of numerous undertakings such as e-La Caixa, Abertis Telecom, Invercaixa Gestión, Sanex, Xfera, Cellnex Telecom, Hispasat, and DDST-Tradia. He has been a director of Sabadell Digital, S.A.U., Banco Sabadell's technology subsidiary, since 2020.
Mireya Giné Torrens Independent Director	Profile Finance/ Academic/ Governance/ Digital & IT (digital transformation)	BA and MA (Cum Laude) in Economics from Pompeu Fabra University, and PhD from the University of Barcelona. Director of International Initiatives, Wharton Research Data Services (WRDS) since 2012. She is currently professor and director of the Department of Financial Management at IESE Business School. Researcher at the European Corporate Governance Institute since 2018. Expert in Corporate Governance for the World Economic Forum since 2019, and member of the Center for Economic Policy since 2020. Independent director of Sabadell Asset Management (2018-2020). Proprietary director of Sabadell Consumer Finance, S.A.U.
María Gloria Hernández García Independent Director	Profile Banking/ Retail & Corporate Banking/ Finance	Degree in Economics, major in Economic Theory, from the Complutense University of Madrid (1981); she holds a Spanish State Commercial Diploma (1983) and qualified as a Trade Expert and Economist in the Spanish Civil Service (1988). Her training includes specialized postgraduate studies in the areas of financial management and corporate strategy for directors. She also has specific training for the position of director and in sustainability from prestigious business schools such as Chicago Booth, IESE Business School, ESADE and CFA Institute. She held various positions in the Directorate-General for Foreign Transactions (1982–1989) and the Directorate-General for the Treasury (1989–1999) until her appointment as Director-General for the Treasury and Finance Policy (1999–2003). During the same period, she was a director representing the State in various public companies and a director of the Bank of Spain and the CNMV. CFO and member of the management committee of Banco Pastor (2003-2011). General Manager of Capital Markets (2011–2015) and Chief Financial Officer (2016–2019) of Bankinter. She has held positions on the boards of directors of companies in various sectors. She was an independent director of Siemens Gamesa (2015-2022), and of BanSabadell Seguros Generales, Bansabadell Vida and Bansabadell Pensiones, which are insurance companies related to the Banco Sabadell Group (2024-2025). She is currently an independent director of Nortegas Energía Grupo, Sociedad Anónima, and of Distribuidora Internacional de Alimentación (DIA), S.A.

George Donald Johnston III Lead Independent Director	Profile Banking/ Corporate Banking/ International	BA in Political Science from Middlebury College, Vermont (USA), and MA in International Economics and Latin American Studies from Johns Hopkins University School of Advanced International Studies, Washington DC. (USA). Executive director at Salomon Brothers (1979-1990), Director of Bankers Trust International and member of its Global Executive Committee (1992-1999), Group Head of M&A for Europe and Member of the Europe Executive Committee and of the Global Operating Committee within the investment banking division of Deutsche Bank (1999-2005), Chairman of the M&A Group for Europe at Deutsche Bank (2005-2010). Currently, lead independent director of Acerinox, S.A. and lead independent director of Merlin Properties, SOCIMI, S.A.
Margarita Salvans Puigbò Independent Director	Profile Banking/ Retail Banking/ Business/Finance/ Risk	Degree in Business Administration and Management from Pompeu Fabra University, Barcelona (2001) and MBA from IESE Business School (2006). Consultant at Boston Consulting Group (2001–2004), controller at Caixa Terrassa (2006–2007) and Controller at Caixa Catalunya, Tarragona i Manresa (2008–2010). She held various positions in the finance department at Catalunya Caixa (2011–2013), during which time she was a director of the UCIT management company Catalunya Caixa Inversió, SGIIC, S.A.U., and a member of the Control Committee of a Catalunya Caixa pension fund. She joined Mango in 2013, holding various positions until her appointment as Chief Financial Officer and member of the Management Committee (2020), a position she continues to hold. Member of the Board of Directors of Mango since March 2024 and sole director of various companies within the Mango Group.
Manuel Valls Morató Independent Director	Profile Auditor/ Finance	Degree in Economics and Business Studies from the University of Barcelona and a post-graduate qualification in Business Administration from IESE/University of Navarra; he is a registered auditor and a member of Spain's official register of auditors since its creation. Partner of PwC (1988-2013), Head of the Audit Division at PwC (2006-2013) and Chairman of PwC Auditores (2006-2011). Independent member of the Governing Board of Institut Català de Finances (2015-2016), and director of Sabadell Information Systems, S.A., Banco Sabadell's technology subsidiary (2020-2022). Currently, Lead independent director of listed company Renta Corporación Real Estate, S.A. and Chairman of the Audit, Control and Risk Committee at COBEGA, S.A.

Pedro Viñolas Serra Independent Director	Profile Banking/ Corporate Banking/ Business/ Finance	Degree in Business Administration from the University of Barcelona and Degree in Business Administration and MBA from ESADE and the Polytechnic University of Catalonia. He has held a number of positions in the Barcelona Stock Exchange (1988-1997): Director of the Research Department, Deputy General Manager in charge of the Research and Corporate Development Department, Finance, Market Supervision, International Relations and subsidiaries. CEO of Filo (1997-2002), a listed real estate group. Partner & CEO of Grupo Financiero Riva y Garcia (2003-2008). He has been director of Grupo Mecanotubo (2006-2010), of SIIC de Paris (2010-2014) and of Grupo Electro Stocks (2011-2020). He has been CEO of Colonial SFL, Socimi, S.A. (formerly Inmobiliaria Colonial, Socimi, S.A.) since 2008 and Deputy Chairman since 2019, holding other positions in governing bodies at Colonial Group companies. He is an independent director of Blue Self Storage, S.L. director of the European Real Estate Association and trustee of Fundación ESADE.
María José García Beato Other external director	Profile Banking/ Legal/ Regulatory/ Governance	Degree in Law and Diploma in Criminology. Spanish State Attorney (1991). Former positions include State Attorney at the Madrid High Court of Justice, Legal Counsel at the Data Protection Agency, State Attorney as consultant to the State Legal Service, Head of the General Secretariat of Communications, and State Attorney at the National Court. Chief of Staff and Under-Secretary at the Ministry of Justice (2000-2004). She has been General Counsel (2005-2008) and General Secretary (2008-2021) and an executive director (2018-2021) of Banco Sabadell. Independent director of listed company Red Eléctrica Corporación, S.A. (2012-2021), director of Papelera Guipuzcoana de Zicuñaga, S.A.U. (2022), and non-executive director of MdF Family Partners, S.A. (2021-2024). Currently, independent director of ACS, Actividades de Construcción y Servicios, S.A., independent director of Iberpapel Gestión, S.A. and independent member of the General and Supervisory Board of EDP Energias de Portugal S.A. Member of the Boards of Trustees of the Banco Sabadell Foundation, the Spanish Banking Association Foundation and the ACS Foundation.

3.3. Positions held by directors in other Banco Sabadell Group companies and other listed companies (C.1.10, C.1.11 and C.1.12)

3.3.1. Positions in other Group companies

Mr. César González-Bueno Mayer Wittgenstein is Chairman of the subsidiaries Sabadell Consumer Finance, S.A.U. and Banco Sabadell, S.A. IBM.

Ms. Mireya Giné Torrens is a proprietary director of the subsidiary Sabadell Consumer Finance, S.A.U.;

Mr. Lluís Deulofeu Fuguat is a non-executive director of subsidiary Sabadell Digital, S.A.U.

3.3.2. Positions in other companies, listed and unlisted

Positions held by directors of Banco Sabadell in other companies and any remunerated activities they perform are detailed in section C.1.11 of the Statistical Annex to the Annual Corporate Governance Report for Listed Companies 2025 attached to this Report.

3.3.3. Specific regulations for credit institutions with respect to the number of positions held by a member of the Board of Directors

In accordance with Article 26 of Law 10/2014, of 26 June, on the regulation, supervision and solvency of credit institutions, the maximum number of directorships that members of the Board of Directors may hold is as follows:

- one executive directorship and two non-executive directorships.
- four non-executive directorships.

For these purposes, executive or non-executive positions held within the same group are counted as a single position, in which case the privileged counting rules apply in accordance with the European Central Bank's Guide to Fit and Proper Assessments and the European Banking Authority Guidelines on Internal Governance (EBA/GL/2021/05). Under the privileged counting rules, it is possible to hold several positions in the same group or positions in companies in which the institution has a significant holding.

When determining the maximum number of positions, positions held in non-profit or non-commercial organizations or entities do not count.

3.4. Banco Sabadell Diversity Policy (C.1.4, C.1.5, C.1.6, C.1.7, C.1.14, and C.2.2)

Banco Sabadell has general policies governing diversity in terms of age, gender, ability, geographical origin, and professional training and experience.

The Banco Sabadell Director Selection Policy, which was approved by the Board of Directors on 25 February 2016 (amended most recently on 12 November 2025), establishes the principles and criteria to be considered in selecting new members and assessing the suitability of members of the Board of Directors, both initially and subsequently, and on re-appointing incumbent members of the Board of Directors, in order to ensure a proper succession process, the continuity of the Board of Directors and the suitability of the Board as a whole. That Policy is available in the "Corporate Governance and Remuneration Policy" section of the Bank's corporate website

www.grupobancosabadell.com.

Under Article 66 of the Articles of Association, the Appointments and Corporate Governance Committee is entrusted with the function of ensuring compliance with the qualitative composition of the Board of Directors, establishing a target for representation of the sex that is less represented on the Board of Directors and drawing up guidelines on how to achieve that target.

The process for selecting candidates to sit on the Board of Directors and for re-electing existing directors is governed by, among others, the diversity principle, fostering diversity in the Board of Directors in order to promote a diverse pool of members, and ensuring that a broad set of qualities and competences is engaged when recruiting members, to achieve a variety of views and experiences and to facilitate independent opinions and sound decision-making within the Board of Directors.



The Board of Directors should ensure that the procedures for selecting its members apply the diversity principle and favour diversity in relation to matters such as age, gender, disability, geographical provenance and educational and professional background, as well as any other aspects deemed suitable to ensure the suitability and diversity of its pool of members. Furthermore, it should ensure that such procedures are free from implicit bias that may entail any degree of discrimination and, in particular, that they facilitate the selection of female directors in the number required to achieve a composition that is balanced between women and men, fulfilling the percentages established in Organic Law 2/2024, of 1 August, on equal representation and a balanced presence of men and women.

Likewise, the Board Appointments and Corporate Governance Committee will ensure that the process abides by the principles of equality and equity, and that it is free from any form of discrimination, including discrimination on the basis of age, disability or gender, without making any distinction by reason of race, sex, religion or any other distinguishing feature, honouring dignity and ensuring equal treatment and opportunities.

The following general principles will be followed when selecting candidates for the role of director and re-electing existing directors:

1. The Board Appointments and Corporate Governance Committee will identify the needs of the Bank, ensuring that the appointment or re-election favours both diversity on the Board and a Board composition that is suitably balanced between independent directors, proprietary directors and executive directors.
2. Candidates for the role of director must meet the requirements of repute, suitability and good governance necessary for the performance of their role; in particular, they should have recognised repute, experience, qualification and training. Furthermore, they should have the necessary availability and a high level of commitment to their role within the Institution.
3. When selecting candidates for the role of director, it will be necessary to consider the objectives, parameters (professional competence, diversity, good repute and suitability) and procedures for selection, assessment and appointment established in this policy and the recommendations and criteria of the Good Governance Code of Listed Companies issued by the CNMV.
4. The procedure will ensure that directors' mandates are renewed in an orderly and well-planned manner, safeguarding the continuity of the business and enhancing the corporate governance system.
5. The procedure will ensure a compliant qualitative composition of the Board of Directors in which external and non-executive directors should account for no less than a majority of the total number of Board members. It will be necessary to ensure that there is a significant proportion of independent directors among the external or non-executive directors.

In discharging its duties, the Appointments and Corporate Governance Committee implemented the policy and measures to increase the diversity of gender, age, education, knowledge and experience that contribute to the collective suitability of the Board, and it proposed that the 2025 General Meeting of Shareholders re-appoint an executive director (Mr. César González-Bueno Mayer Wittgenstein), and appoint two independent directors (Ms. María Gloria Hernández García and Ms. Margarita Salvans Puigbò) and re-appoint an independent director (Mr. Manuel Valls Morató).

Additionally, in November 2025, on the occasion of the resignation of Mr. David Martínez Guzmán as a director, the Appointments and Corporate Governance Committee conducted an analysis of the composition of the Board and an assessment of its collective suitability,

and reviewed the Board's Competency Matrix; as a result, it ordered that the Internal Governance Framework and the Board's Competency Matrix be updated and republished.

In compliance with recommendation 14 of the Good Governance Code of Listed Companies, with the function assigned in section 4.17 of its Regulations, and with Banco Sabadell's Director Selection Policy, the Appointments and Corporate Governance Committee verified, on 4 February 2026, that the appointment and re-appointment decisions adopted in 2025 by the General Meeting of Shareholders were compliant with the Policy. That verification entailed checking that the appointments and re-appointments conformed to the parameters and requirements for membership of the Board of Directors of a credit institution as set out in both the Policy and the regulations in force. The Committee also concluded that those appointments and re-appointments favour an appropriate composition of the Board of Directors by increasing and strengthening its diversity in terms of directors' categories and the knowledge, skills and experience they bring to the Board. In this way, the Board of Directors and the Appointments and Corporate Governance Committee fulfil their duty to contribute to increasing the diversity of competencies in the Board of Directors. Specifically, with the appointment of Ms. María Gloria Hernández García, an economist with experience as an executive and an independent director, the diversity of banking knowledge and experience is increased and strengthened, particularly in retail and corporate banking, financial and capital markets, insurance, accounting and auditing, risk management and control, planning and strategy, corporate governance, prevention of money laundering and terrorist financing, responsible business and sustainability, governing bodies, and management and direction of organisations, with solid experience in government and public policy, regulatory and supervisory bodies, and communication and institutional relations, combined with the ability to apply this knowledge and expertise to the banking business. The appointment of Ms. Margarita Salvans Puigbò, who has a financial background with executive and business experience, increased and strengthened the diversity of banking knowledge and experience, particularly in retail banking, financial and capital markets, accounting and auditing, risk management and control, planning and strategy, corporate governance, human resources, culture, talent and remuneration, governing bodies, and management and leadership of organisations with solid business and consulting experience, combined with the ability to apply this knowledge and expertise to the banking business.

To select candidates, the Appointments and Corporate Governance Committee relied on the Matrix of competencies and diversity of the members of the Board of Directors of Banco Sabadell, which defines directors' abilities and knowledge. The Committee also relied on external consultants, which provided it with candidates who matched the skill profiles that the Appointments and Corporate Governance Committee prioritised.

At 2025 year-end, there were six female directors: five female independent directors out of a total of ten independent directors, and one female other external director.



The trend in the number of female directors in the Board of Directors and its committees in recent years is as follows:

6

Female directors



1 Other external director (out of 2)



5 Independent directors (out of 10)

	Number of female directors				% of total directors in each category			
	2025	2024	2023	2022	2025	2024	2023	2022
Executive	—	—	—	—	—	—	—	—
Proprietary	—	—	—	—	—	—	—	—
Independent	5	5	4	4	50.00	50.00	40.00	40.00
Other external	1	1	1	1	50.00	50.00	50.00	50.00
Total	6	6	5	5	42.86	40.00	33.33	33.33

The Board of Directors and the Appointments and Corporate Governance Committee are committed to favouring diversity on the Board; they work to ensure that the Board has a sufficient number of female directors and to fulfil the objective for representation of the gender that is under-represented on the Board. In 2024, women accounted for 40% of the 15 members of the Board of Directors of Banco Sabadell (currently 43% of the 14-member Board), fulfilling in advance the requirements of Spain's Organic Law 2/2024, of 1 August, on the equal representation and balanced presence of women and men, and the Bank's commitment as set out in the Sabadell Sustainable Commitment for 2024, a situation that was maintained in 2025. Women also accounted for 50% of independent directors, thereby amply fulfilling the requirement of the Directive of the European Parliament and of the Council on improving the gender balance among directors of listed companies and related measures.

With regard to the presence of women on Board committees, the Remuneration Committee is chaired by a female independent director and all of its ordinary members are women. There are female directors in all the Board committees: Women represent a broad majority (75%) of the Audit and Control Committee, and 60% of the Appointments and Corporate Governance Committee, while women and men are represented equally in the Risk Committee, and women account for 20% of the Credit Delegated Committee. Women account for 16.67% of the Strategy and Sustainability Committee (in matters of strategy) and 20% (in matters of sustainability). The evolution of the representation of women on the Board's committees in recent years is shown below:

Number of female members in the Committee

	2025		2024		2023		2022	
	Number	%	Number	%	Number	%	Number	%
Strategy and Sustainability Committee	1	16.67*	1	16.67*	1	16.67*	1	16.67*
Credit Delegated Committee	1	20.00	1	20.00	1	20.00	2	40.00
Audit and Control Committee	3	75.00	2	50.00	1	25.00	2	50.00
Appointments and Corporate Governance Committee	3	60.00	3	75.00	3	75.00	2	50.00
Remuneration Committee	3	100.00	3	100.00	2	66.67	2	50.00
Risk Committee	2	50.00	2	50.00	2	50.00	2	50.00

* 20% in the area of Sustainability.

Banco Sabadell also has a set of policies, internal rules and codes of conduct that guarantee behaviour that favours diversity in all the organization's processes that have an impact on diversity. These rules, which are applicable to the entire organization, guarantee an increase in its diversity.

The third Plan for Effective Equality between women and men in Banco Sabadell and Sabadell Consumer Finance, S.A.U., which sets out the objectives for promoting diversity within the organization for the period 2022-2025, was signed in February 2022.

At 2025 year-end, women accounted for 25% of senior management positions, an increase of 6.8 percentage points with respect to 2024 year-end (18.2%). The percentage of female executives at Banco Sabadell is 35.5%, maintaining the steady improvement observed in recent years.

+6.8 p.p.
Increase in the number of women
in executive positions

3.5. Director Selection (C.1.16, C.1.21, C.1.22 and C.1.23)

In accordance with the provisions of articles 50, 53, 59 and 66 of the Articles of Association, articles 17, 23 and 24 of the Board of Directors Regulation, the Banco Sabadell Director Selection Policy dated 25 February 2016 (last amended on 12 November 2025), the Banco Sabadell Board of Directors Renewal Plan and the Procedure for assessing the suitability of members of the Board of Directors and key function holders of Banco Sabadell, the procedures for appointment, reappointment, evaluation and removal of directors are as follows:

Selection

The Appointments and Corporate Governance Committee is responsible for analyzing the competencies and diversity of the Board of Directors in order to determine the profile of candidates for director, for which purpose it relies on the Matrix of competencies and diversity of the members of the Board of Directors. In compliance with the Policy, it is responsible for performing a prior assessment of the competencies, knowledge and experience required for appointment or re-appointment of Board members and, to that end, it must consider the balance of knowledge, skills, diversity and experience already existing among the members of the Board of Directors. In accordance with the Matrix of Competencies

and Diversity of the members of the Board of Directors, it will define the roles and capabilities required of the candidates to fill each vacancy and will decide the time and dedication necessary for them to perform their duties effectively.

To select candidates, the Appointments and Corporate Governance Committee may, if deemed necessary, engage a prestigious consultant in the field of personnel selection to initiate a process of finding candidates that fit the desired profile. Additionally, any director may suggest candidates for director provided they meet the requirements of the Banco Sabadell Director Selection Policy.

Suitability assessment

Once a candidate has been selected, the procedure for assessing the suitability of Board members must be applied; on this basis, the Appointments and Corporate Governance Committee analyzes the information about the candidates and the reports presented by the Board Secretary, drawn up by the Bank's General Secretariat, as to their commercial and professional integrity, knowledge and experience and their willingness to provide good governance, by application of the requirements defined in Law 10/2014, of 26 June, and having regard to the criteria for assessing the suitability of the members of the Board of Directors as set out in Royal Decree 84/2015, of 13 February, implementing the aforementioned Law 10/2014, of 26 June, and the European Central Bank guidelines on fit and proper assessments, as well as the Guidelines to assess the suitability of members of management bodies and key function holders (EBA/GL/2021/05). The Appointments and Corporate Governance Committee checks that candidates meet the requirements as to integrity, knowledge, experience and governance envisaged in the applicable legislation and draws up a candidate suitability assessment report. In addition, candidates for directorships must be vetted by the European Central Bank.

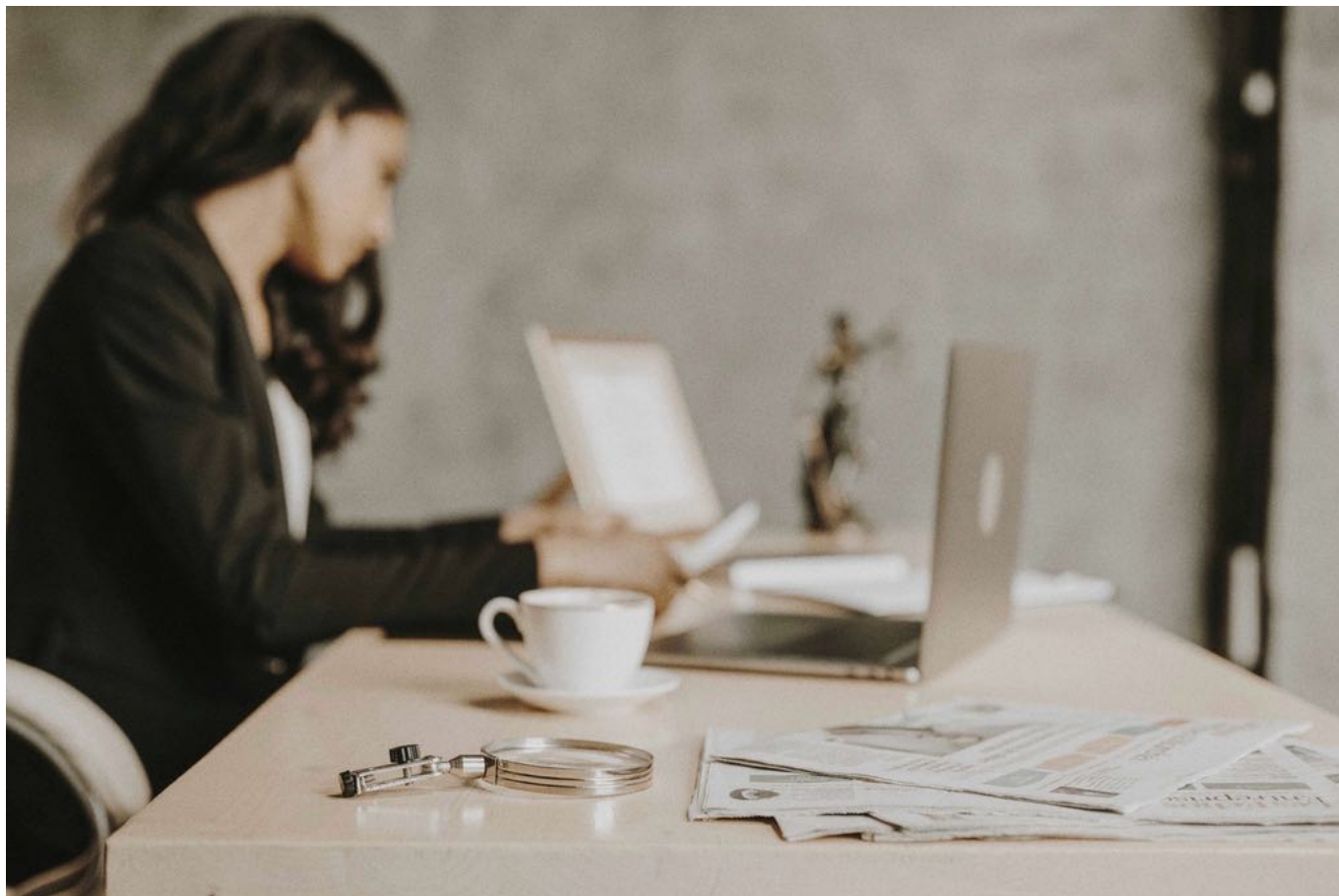
The Appointments and Corporate Governance Committee is also entrusted with assessing director suitability on an ongoing basis, evaluating the profile of the persons most suited to being members of the various committees, and making proposals in this regard to the Board of Directors; in particular, it must seek to ensure that the rules on the qualitative composition of the Board of Directors are complied with.

Appointment

After assessing the suitability of candidates for director, the Appointments and Corporate Governance Committee is entrusted, among its basic responsibilities in accordance with Article 66 of the Articles of Association, with making proposals to the Board for the appointment of independent directors either by co-optation or for submission to a vote at the General Meeting of Shareholders, advising on proposals to appoint other director categories by co-optation or by referral to the General Meeting of Shareholders.

Ordinary members of the Board of Directors are appointed by the General Meeting of Shareholders. Any vacancies arising on the Board of Directors are filled by the General Meeting of Shareholders, although the Board of Directors may make appointments by co-optation as provided by the Capital Companies Law. Directors appointed by co-optation hold office until the next General Meeting of Shareholders.

The Appointments and Corporate Governance Committee must ensure that the appointment favours both diversity and an adequate balance in the composition of the Board between the various director categories (independent, proprietary and executive).



Re-appointment

Directors are appointed for a term of at most four years and they can be re-appointed.

The Articles of Association and Board of Directors Regulation do not establish an age or term limit for directors or any other requirements for independent directors that are stricter than those provided by law.

Specific requirements applicable to the Chairman and CEO

The Succession Plan for the Chairman and CEO of Banco Sabadell establishes the specific requirements for appointment as Chairman of the Board of Directors and CEO; in general, they must be of acknowledged commercial and professional repute, have suitable knowledge and experience to perform the duties of the office, and be willing to exercise good governance in the Bank.

In particular, they must have proven experience in the financial sector and/or in senior management functions, have sufficient technical training in the fields of finance and/or business management and administration for the performance of the executive functions inherent to their position, and they must accredit a professional career that demonstrates leadership and/or entrepreneurship, in addition to meeting the conditions of suitability required of a director of a credit institution in accordance with the applicable regulations.

Removal

Directors must step down when their term ends unless they are re-appointed, or when the General Meeting of Shareholders or the Board of Directors so decides using the powers conferred on them by law or the Articles of Association. The Appointments and Corporate Governance Committee is empowered to make proposals for the removal of independent directors by the General Meeting of Shareholders, and to advise on proposals to remove directors in other categories. The General Meeting of Shareholders may remove directors at any time, as provided in article 50 of the Articles of Association.

Restrictions

The following may not hold office as members of the Board of Directors:

- Minors.
- Persons disqualified by law, undischarged bankrupts or insolvents, those under convictions involving disqualification from holding public office, and those convicted of serious breaches of the law or Company regulations, or who are prevented from engaging in trade by reason of their office.
- Government officials whose duties are related to, or have a bearing on, the business of the Bank.
- Those in default with respect to any past-due obligation to the Bank.
- Persons in any of the situations of incompatibility or limitation on holding office as provided by law.

In accordance with the most recent amendment to the Articles of Association, which was adopted by the General Meeting of Shareholders on 20 March 2025, independent directors may not hold a directorship or an executive position in Spanish or European Union credit institutions, or insurance or reinsurance companies, or similar entities in other geographies in which Banco Sabadell or its consolidated Group operate.

Induction and training objectives

The Board of Directors has training initiatives in place to ensure that the directors, both individually and collectively, are suitable and able to perform their duties in accordance with their specific responsibilities and their participation in Board committees. In this context, the Director Selection Policy includes these initiatives: (i) initial induction training provided when a new member joins the Board, and (ii) the Director Training Programme, both of which form part of the annual continuous training given to members of the Board of Directors.

These training initiatives will have sufficient human and financial resources to achieve the desired objective. The Appointments and Corporate Governance Committee is responsible for the training initiatives and programmes, assisted by the General Secretariat, which coordinates the content of the training with the appropriate divisions of the Bank.

(i) Initial induction training for newly-appointed directors

To introduce newly-appointed directors to the Bank and its corporate governance system, they receive key information from Banco Sabadell within one month of taking office, and induction must be completed within a period of six months.

Where new directors are required to have specific knowledge and skills, initial training and onboarding aim to meet the identified needs within an appropriate time frame, before they take up the position or, otherwise, as soon as possible after they take up the position.

In any case, new members of the Board must attain the knowledge and competency requirements within the term established by the competent authority and no later than one year after taking office.

The purpose of the initial training and onboarding initiatives is to help new directors to clearly understand Banco Sabadell's structure, business model, risk profile and corporate governance systems and their role within the Bank, and also, where appropriate, to prepare a person to occupy a specific new position on the Board of Directors or on a Board committee.

(ii) Director training programme

In order to place particular emphasis on the skill and training requirements for directors of Banco Sabadell in specific areas of the bank, each year the Board of Directors approves an ongoing Director Training Programme based on a report by the Appointments and Corporate Governance Committee. The Appointments and Corporate Governance Committee designs the content of the programme with the assistance of the General Secretariat, which coordinates the other pertinent units of the Bank and may engage external trainers and consultants for this purpose.

The programme is generally oriented towards strengthening training in the banking business and providing an understanding of the management policies and mechanisms in key aspects of new regulatory requirements, applicable regulatory changes, financial management, risk management and key aspects of the business. The programme is open to including in-depth sessions on topics proposed by the directors themselves. The content of the programme is kept up to date, taking account of changes in the internal governance framework, strategic changes, new products and other material developments, as well as changes in applicable legislation and market developments.

The 2025 Director Training Programme was approved by the Board of Directors at a meeting on 29 January 2025. The programme consisted of seven training sessions on the following matters:

- Geopolitical risks
- “Being Sabadell”: talent management model
- Mortgage journey: demand, channels and challenges for the future
- Evolution of customer service channels
- How we assess and manage country risk and risk with financial institutions
- Cyber-resilience
- Risk Data Aggregation (RDA)

All the sessions were delivered in 2025. The sessions addressed current issues that are related to specific novel subjects and help to anticipate future changes. In addition, on 5 March 2025, members of the Board visited the Mobile World Congress 2025 in Barcelona, during which they were given a presentation on the major technology trends of the year and principal innovations by the main technology companies; also, on 25 September 2025, the Board received training on anti-money laundering and combating the financing of terrorism (AML/CFT) to update case studies and legislative developments.

At a meeting on 4 February 2026, after considering various aspects of the training provided (diversity and relevance of the topics, quality of the speakers, level of depth and application to the Bank, among others), the Appointments and Corporate Governance Committee rated the 2025 Director Training Programme as satisfactory and concluded that the standard of delivery was excellent.

3.6. Reasons for which a director is obliged to resign (C.1.19, C.1.36 and C.1.37)

Under article 50 of the Articles of Association and article 24 of the Board of Directors Regulation, and in compliance with the Banco Sabadell Group Code of Conduct and its Policy on Conflicts of Interest of Directors and Senior Management, directors must disclose any case where there might be a conflict of values or interests in order to enable the Bank to manage such situations appropriately.

Directors are obliged to resign when they incur in a case of incompatibility, prohibition or limitation as provided for in the applicable regulations.

Additionally, in accordance with article 24 of the Banco Sabadell Board of Directors Regulation, directors must step down when their term ends and when the General Meeting of Shareholders or the Board of Directors so decides using the powers conferred on them by law or the Articles of Association, and;

- If they meet any of the conditions of incompatibility or prohibition envisaged in the law or the Articles of Association.
- If they are arraigned for a crime or are the subject of disciplinary proceedings by the supervisory authorities for a serious or very serious violation.
- When their continuance on the Board might jeopardise the company's interests.

During 2025, the Board of Directors was not informed and did not otherwise become aware of any situation affecting a director, whether or not related to their performance in the Bank itself, that might impair the Bank's credit and reputation; consequently, it was not necessary to minute any such case.

3.7. Working of the Board of Directors (C.1.9, C.1.20, C.1.24, and C.1.35)

3.7.1. Proxies

Directors must attend Board of Directors meetings in person. However, when they can not attend in person, they may grant proxy to another director. Article 60 of the Articles of Association establishes that non-executive directors may grant proxy only to another non-executive director.

The Banco Sabadell Director Remuneration Policy for 2024, 2025 and 2026, applicable since it was approved by the General Meeting of Shareholders on 23 March 2023, establishes the system for remunerating the directors for performing their functions as members of the Board of Directors. In addition to fixed remuneration for membership of the Board of Directors, the Policy also provides for attendance fees, for at most 11 ordinary meetings, with the possibility of collecting attendance fees for at most two meetings that are missed for justified reasons provided that proxy is granted in those cases.

3.7.2. Adopting resolutions

No supermajority is required for any decision, other than the majority required by law.

3.7.3. Powers delegated by the Board

The CEO, Mr. César González-Bueno Mayer Wittgenstein, has been granted all the powers of the Board, except those that may not by law be delegated, which are necessary for him to manage the institution effectively as its first executive. The Chief Risk Officer, Mr. David Vegara Figueras, who is a member of the Board of Directors, has the necessary general powers to perform his executive duties as CRO in charge of the Bank's Risk Regulation and Control Unit.

The Credit Delegated Committee is delegated by the Board with the powers to analyze and, as appropriate, decide upon credit and other transactions in accordance with the cases and limits established by express delegation of the Board of Directors, as set out in the Regulation of the Credit Delegated Committee and detailed in section 4.2.

3.7.4. Information and documentation

The Bank has procedures for providing the directors with the necessary information and material to prepare for meetings of the Board of Directors and its committees in a timely manner.

Article 21.1 of the Board of Directors Regulation establishes that the notice of meeting shall always contain the Agenda, which must set out, among other points, issues relating to reports from subsidiaries and Board Committees as well as any proposals and suggestions made by the Chairman and the other members of the Board and the General Manager(s) of the Bank, which must be presented at least five working days in advance of the date of the Board meeting; such proposals must be accompanied by the pertinent material for distribution to the directors.

Additionally, article 25 provides that:

- Directors are vested with the broadest powers to be informed about any aspect of the company, to examine its books, records, documents and other background information on the company's transactions and to inspect all of its installations. The right to information extends to subsidiaries, both domestic and foreign.
- So as not to disturb the ordinary running of the company, the exercise of the powers of information shall be channelled through the Chairman or the Secretary to the Board, who shall attend to the director's requests by giving the information directly, providing appropriate access to individuals at the relevant level of the organization, or providing the means by which the director may carry out the desired formal examination and inspection on site.

Banco Sabadell has a procedure for providing the directors with the necessary material to prepare for meetings of the Board of Directors and its committees in a confidential and encrypted way, using the Diligent Boards software running on iPads. Information for Board meetings is circulated to the directors one week in advance, and it is elaborated upon or updated in the boardbook as needed; hence, they are duly informed.

3.8. Number of Board and Committee meetings, and attendance (C.1.25 and C.1.26)

The following table shows the number of meetings held by the Board of Directors and its Committees in 2025:

Number of meetings							
23	0	14	38	13	16	11	16
Board of Directors	Board of Directors meetings not attended by the Chairman	Strategy and Sustainability Committee	Credit Delegated Committee	Audit and Control Committee	Appointments and Corporate Governance Committee	Remuneration Committee	Risk Committee

Additionally, the Lead Independent Director held two meetings with the other directors, on 28 May and 25 September 2025, which were not attended by the executive directors either in person or by proxy.

Attendance at Board of Directors meetings is shown in the following table:

Number of meetings		%	
23/23	23/23	95.77 %	100 %
Meetings which were attended in person by at least 80% of directors	Meetings attended by all the directors in person or by proxy	Attendance in person as a % of the total votes during the year	Votes cast with all directors present or by proxy



3.9. Takeover bids (C.1.38)

The Bank is not a party to any material agreement that would be triggered, modified or terminated by a change of control of the company by reason of a takeover bid or its effects.

Proposal for a merger and voluntary tender offer for the acquisition of Banco Sabadell shares by Banco Bilbao Vizcaya Argentaria, S.A.

In an Inside Information disclosure filed on 30 April 2024 with the Spanish National Securities Commission (CNMV) under registration number 2.227, Banco Sabadell stated that on that same day it had received an indicative written proposal from BBVA for a merger ("the Proposal"). Banco Sabadell also stated that the Board of Directors would properly consider all aspects of the Proposal.

On 6 May 2024, Banco Sabadell filed a new Inside Information disclosure with the CNMV (registration number 2.234) in the form of a press release on the decisions adopted by the Board. Banco Sabadell announced that, having carefully reviewed the Proposal in fulfilment of its fiduciary duties and with the assistance of its financial and legal advisors, the Board took the view that the Proposal significantly undervalued Banco Sabadell's potential and standalone growth prospects. The press release added that the Board was highly confident of Banco Sabadell's growth strategy and its financial targets and was of the view that Banco Sabadell's standalone strategy would create superior value for its shareholders. Based on its detailed assessment, the Board concluded that it was in the best interests of Banco Sabadell and its shareholders to reject BBVA's proposal. The Board believed that this decision was also aligned with the interests of Banco Sabadell's customers and employees.

Moreover, as part of its commitment to creating shareholder value, and in the light of the company's business plan and strong capital generation, the Board reaffirmed its pledge to distribute to shareholders on an ongoing basis any capital that is surplus to a pro forma CET1⁵ ratio of 13%. Assuming successful execution of the business plan, the bank estimates that surplus capital and recurring dividends generated over 2024 and 2025 will come to a combined total of €2.4 billion⁶. Part of the resulting distribution to shareholders might be subject to regulatory approval.

On 8 May 2024, Banco Sabadell filed with the CNMV an Inside Information disclosure (registration number 2.240) in response to media reports published the same day. To ensure full transparency vis-à-vis the market, the bank made public the exact text of a letter received on 5 May 2024 by the Chairman of the Board of Directors of Banco Sabadell from his counterpart at BBVA. There had been no prior contact or exchange between the parties. In his letter, the Chairman of the Board of Directors of BBVA made it clear that BBVA was unable to improve the price terms of its merger proposal.

On 9 May 2024, BBVA submitted a preliminary announcement to the CNMV of a takeover bid to acquire all shares issued by Banco Sabadell.

⁵ Applying the regulatory timetable for the output floor, 13% is established in terms of fully-loaded CET1.

⁶ Subsequently, in July 2024, the estimate of the amount of remuneration for Banco Sabadell shareholders for 2024 and 2025 was updated, and the market was informed that the expected amount had risen from the €2.4 billion announced on 6 May 2024 to €2.9 billion (which included the €250 million not yet executed under the Banco Sabadell share buyback programme that was suspended on 13 May 2024 following the publication of the preliminary announcement of the takeover bid, as well as an additional €250 million from the lower impact of Basel IV). Additionally, at a meeting on 6 February 2025, the Board of Directors updated its estimate of the total shareholder remuneration out of 2024 and 2024 earnings to €3.3 billion. Subsequently, at a meeting on 7 May 2025, the Board of Directors again updated its forecast of the total shareholder remuneration out of 2024 and 2025 earnings to €3.4 billion. Later, at a meeting on 23 July 2025, the Board of Directors resolved to set the target total shareholder remuneration for the years 2025 to 2027 (including the extraordinary dividend of €0.5 per share conditional upon completion of the sale of TSB Banking Group plc) at €6.3 billion. Finally, on 30 September 2025, the Board of Directors resolved to increase this target total shareholder return for the years 2025 to 2027 to €6.45 billion.

The bid was conditional on receiving acceptance from Sabadell shareholders who, combined, owned at least 50.01% of the bank's share capital (this was subsequently amended to a number of shares that would enable BBVA to acquire at least more than one-half of the effective voting rights of Banco Sabadell, including those held by Banco Sabadell at that time, which BBVA undertook to cancel at the first General Meeting of Shareholders of the bank to be held after the takeover bid). It was also subject to approval by BBVA shareholders of a capital increase through the issuance of new common stock for non-cash contributions in an amount sufficient to cover the entire consideration being offered. In addition, the bid required clearance by the Spanish National Markets and Competition Commission (CNMC) and the Prudential Regulation Authority (PRA) in the UK. Furthermore, the deal was subject to approval from the CNMV itself and an expression of "non-opposition" from the European Central Bank.

On 24 May 2024, BBVA applied to the CNMV for authorisation of the takeover bid. The CNMV acknowledged on 11 June 2024 that it was considering the application. Under the initial terms of the bid, BBVA offered to exchange one newly issued BBVA share for every 4.83 shares of Banco Sabadell tendered in return.

On 5 July 2024, at an extraordinary general meeting, the shareholders of BBVA resolved to increase share capital by issuing new ordinary shares in a nominal amount of up to €551,906,524.05 to make provision for the non-cash consideration that would become payable under the terms of BBVA's bid to acquire 100% of shares in Banco Sabadell.

Subsequently, in September 2024, BBVA received clearance from the UK PRA to acquire indirect control of TSB, and the ECB expressed "non-opposition" to BBVA taking control of Banco Sabadell.

On 1 October 2024, BBVA announced, by means of a disclosure of Other Relevant Information to the CNMV with registration number 30.745, the adjustment of the consideration of the takeover bid in accordance with the provisions of section 8 of the preliminary announcement of the takeover bid, by establishing, from 10 October 2024 and following payment by Banco Sabadell and BBVA of their respective interim dividends in cash out of 2024 earnings, an exchange ratio of one newly issued ordinary share of BBVA and €0.29 in cash for every 5.0196 ordinary shares of Banco Sabadell that accept the takeover bid.

On 28 March 2025, BBVA announced, through a communication of Other Relevant Information to the CNMV with registration number 33.736, the adjustment of the consideration of the takeover bid, as a result of the supplementary dividend charged to Banco Sabadell's 2024 earnings, by establishing, as from 26 March 2025 (ex-dividend date), an exchange ratio of one newly issued BBVA ordinary share and €0.29 in cash for every 5.3456 ordinary shares of Banco Sabadell that accept the takeover bid. It also announced another adjustment to the exchange ratio as a result of BBVA's supplementary dividend out of 2024 earnings, by establishing, from 8 April 2025 (ex-dividend date), an exchange ratio of one newly issued BBVA ordinary share and €0.70 in cash for every 5.3456 ordinary shares of Banco Sabadell that accept the takeover bid.

On 30 April 2025, the CNMC cleared the concentration transaction between BBVA and Banco Sabadell in the second phase with certain commitments offered by BBVA. On 24 June 2025, the Spanish Cabinet authorised the third phase of that concentration with a condition additional to the commitments by BBVA that had been accepted by the CNMC based on various criteria of general interest.

On 29 August 2025, BBVA announced, through a communication of Other Relevant Information to the CNMV with registration number 36.496, the adjustment of the consideration of the takeover bid, as a result of the interim dividend for 2025 of Banco Sabadell, by establishing, as from 27 August 2025 (ex-dividend date), an exchange ratio of one newly issued

ordinary share of BBVA plus €0.70 in cash for every 5.5483 ordinary shares of Banco Sabadell that accept the takeover bid.

The takeover bid was authorised by the CNMV on 5 September 2025. On 11 September 2025, the Board of Directors of Banco Sabadell approved its mandatory report on the takeover bid, in which it recommended that Banco Sabadell shareholders not accept the takeover bid.

Subsequently, on 22 September 2025, the CNMV authorised the amendment to the terms of the takeover bid decided by BBVA, consisting of setting the consideration for the takeover bid at one newly issued ordinary share of BBVA for every 4.8376 ordinary shares of Banco Sabadell that accept the takeover bid. On 30 September 2025, the Board of Directors of Banco Sabadell approved its mandatory report on the modified bid, recommending once again that Banco Sabadell shareholders not accept the takeover bid.

Finally, after the acceptance period ended, on 16 October 2025, the CNMV announced that the takeover bid had been unsuccessful because it had not received acceptance from a sufficient number of Banco Sabadell shares; consequently, the bid had failed.

3.10. Assessment of the Board and its Committees (C.1.17 and C.1.18)

Each year since 2007, the Bank assesses the performance of the Board of Directors and of its committees (currently the Strategy and Sustainability Committee, Credit Delegated Committee, Audit and Control Committee, Appointments and Corporate Governance Committee, Remuneration Committee and Risk Committee). In compliance with Recommendation 36 of the Good Governance Code of Listed Companies (June 2020 revision), at least every three years the Board of Directors of Banco Sabadell engages an independent external consultant to perform the evaluation. The last evaluation carried out with the assistance of an external consultant referred to 2022.

On 29 January 2025, following a report from the Appointments and Corporate Governance Committee, the Board of Directors approved the 2024 assessment, which had been carried out internally.

The internal assessment approach was based on two core elements: (i) input from directors; and (ii) analysis of key information on Banco Sabadell in relation to significant aspects of the Bank's system of corporate governance.

Based on the parameters considered in the 2024 self-assessment reports for the Board and its committees, the outcome seen in previous years was reaffirmed: Banco Sabadell is compliant with all regulatory requirements and achieves an extremely high degree of fulfilment of corporate governance recommendations and good practices. Moreover, the Board found that its own functioning and the functioning of its Committees, and the performance of the Chairman, Deputy Chairman, Chief Executive Officer, Lead Independent Director and Secretary and Deputy Secretary of the Board in 2024, were consistent with a standard of excellence.

As a result of the 2024v evaluation, in 2025, i) equality continued to be strengthened at all levels of responsibility. In this regard, a prospection for female candidates (persons of the gender least represented on the Board) was initiated at the end of 2024 in order to be ready for possible changes in the Board of Directors; it concluded with the incorporation of two new independent directors in 2025: Ms. María Gloria Hernández García and Ms. Margarita Salvans Puigbò. The indicators of female representation at various management echelons are also monitored periodically, and a Diversity Procedure 2025 was approved, linked to the

Sustainability Policy and to strengthening internal governance, as well as increasing the percentage of women on the Board of Directors; ii) the documentation made available to directors has been simplified to avoid excessive volumes and thus speed up the review of information; iii) the documentation presented to the Board of Directors on KPIs has been improved to facilitate its analysis and monitoring in a simple and intuitive manner; and iv) fulfilment of specific action priorities for the various Committees for 2025 was monitored.

The assessment of the performance of the Board of Directors and its Committees in 2025 was carried out with the assistance of an external consultant at the beginning of 2026.

After analysing and evaluating the technical proposals submitted by various independent experts that responded to the request for proposals, the Appointments and Corporate Governance Committee selected PRICEWATERHOUSECOOPERS AUDITORES S.L. as an independent expert to assist the Board in evaluating its performance and that of its committees in 2025.

The business relations with the external consultant, PRICEWATERHOUSECOOPERS AUDITORES, S.L., and with any other company in its group are within the ordinary course of business. It provided advisory and consultancy work to the Banco Sabadell Group during the year, but none in relation to the appointment of directors or senior executives or in relation to remuneration systems.

In line with the recommendations in the Code of Good Governance for Listed Companies (June 2020 revision), the assessment of the performance of the Board of Directors and its committees and of the CEO, Secretary and Deputy Secretary was organised and coordinated by the Chairman of the Board of Directors, while the Lead Independent Director directed the assessment of the Chairman, all with the support of the independent expert.

The areas that were assessed are those indicated in the CNMV Technical Guide entitled On Nomination and Remuneration Committees, which expands on the scope of the assessment provided for in Recommendation 36 of the Good Governance Code of Listed Companies (June 2020 revision). Specifically, the assessment was carried out in three areas:

- **Working:** The quality and efficiency of the functioning of the Board and its committees were assessed, including the degree to which the Board and the Committees make effective use of the contributions by their members; the frequency and duration of meetings; the content of the agenda and the adequacy of the time devoted to dealing with the various items on the basis of their importance (taking account of specific examples or cases); the breadth and openness of the debates, avoiding groupthink; an analysis of whether the decision-making process within the Board is dominated or strongly influenced by one member or a small group of members; and monitoring directors' attendance;
- **Performance:** The assessment covered the performance of the Chairman and Secretary of the Board of Directors and the Chief Executive Officer; the performance and contribution of each director, paying particular attention to those in charge of the various Board Committees; the performance of their duties by the Chairman, Chief Executive Officer, Deputy Chairman, Lead Independent Director, Secretary and Deputy Secretary of the Board; and there was an ongoing evaluation of Board members on an individual and collective basis.
- **Composition and continuous improvement:** The size, composition and diversity of the Board and the Committees was assessed, as well as the quality of the information received, training, the Committees, fulfilment of the action plan for 2025, and the proposed action plan or recommendations to correct any



deficiencies detected or improve the functioning of the Board or its Committees in 2026.

The work methodology proposed by PwC is based on previous experience in carrying out similar assessments and revolves around three combinable dimensions that ensure complete coverage of the aspects detailed above. The three dimensions that were assessed are:

1) Consideration of the main areas of assessment:

- (i) Evaluation of the functioning of the governing bodies, in terms of working, skill development and relations with other bodies, etc.;
- (ii) Decision-making performance and process;
- (iii) Composition and continuous improvement of these bodies.

2) Consideration of analysis perspectives:

- (i) Compliance with applicable requirements;
- (ii) Alignment with additional guidelines and the code of good governance;
- (iii) Comparison with additional trends and standards;
- (iv) Benchmarking.

3) Implementation of the methodology based on three processes:

- (i) Documentary analysis, which includes requesting information, reviewing documentation, and verifying the level of compliance;
- (ii) Self-assessment questionnaires, designed on the basis of key aspects of the regulations and focused on operational issues in connection with the governing bodies;
- (iii) Interviews, whose objective is to explore the responses obtained in the questionnaires in greater depth and provide a more comprehensive qualitative overview.

The outcome of the assessment made it possible, on the basis of the identified milestones, to also draw up an action plan for 2026 that will enable the Board of Directors and the Appointments and Corporate Governance Committee to identify possible areas for development and progress in the design of, and compliance with, a corporate governance system.

On 5 February 2026, following a report from the Appointments and Corporate Governance Committee, the Board of Directors approved the 2025 assessment, which had been carried out with the assistance of an external consultant.

3.11. Remuneration of directors and senior management (C.1.13 and C.1.14)

Further details of director remuneration may be found in the Annual Report on Director Remuneration for 2025, approved by the Board of Directors on the same date as the Annual Report on Corporate Governance, which is published on the website of the CNMV and available on the corporate website of Banco Sabadell, www.grupobancosabadell.com, under "Corporate Governance and Remuneration Policy".

Remuneration earned by the Board of Directors in the year (thousand euro)	11,153
Amount of funds accumulated by current directors in long-term savings plans with vested financial rights (thousand euro)	5,112
Amount of funds accumulated by current directors in long-term savings plans with non-vested financial rights (thousand euro)	9,094
Amount accumulated by former directors in long-term savings plans (thousand euro)	7,591

The remuneration collected by the Board of Directors during the year includes the amounts corresponding to 2025 for all those who were members of the Board at any time in the year, for both their functions as directors and for their executive functions.

The remuneration received in 2025 amounts to €11,153 thousand, as shown in table c.i) of section 7. Statistical Annex of the Report on Director Remuneration, which includes €666 thousand corresponding to deferred amounts paid to members of the Board of Directors for performing executive functions in previous years.

	2025	2024
Summary of directors' ordinary remuneration (*)	10,487	8,598
For executive functions	5,917	4,109
For non-executive functions	4,570	4,489
Payments deferred from prior years for non-executive directors (**)	666	574
Total amount	11,153	9,172

(*) This includes amounts accrued that are not subject to deferral.

(**) Payments to non-executive directors for executive functions in previous years.

At 31 December 2025, the members of Banco Sabadell's senior management and the Head of Internal Audit, excluding executive directors, are as follows:

Senior management:

General Managers

Gonzalo Barettino Coloma	General Secretariat
Elena Carrera Crespo	Operations and Technology
Sergio Alejandro Palavecino Tomé	Finance
Cristóbal Paredes Camuñas	Corporate & Investment Banking
Carlos Paz Rubio	Risk
Marcos Prat Rojo	Strategy and Efficiency
Sonia Quibus Rodríguez	People and Sustainability
Jorge Rodríguez Maroto	Retail Banking
Carlos Ventura Santamans	Business Banking and Branch
Virginia Zafra de Llera	Network
	Communication and Corporate

Deputy General Manager Head of Internal Audit

Nuria Lázaro Rubio

Internal organizational changes were approved at the end of 2024 that took effect on 1 January 2025: Mr. Marc Armengol Dulcet, Chief Operating and Technology Officer, was appointed Chief Executive Officer of the UK subsidiary, TSB, and Ms. Elena Carrera Crespo was appointed Chief Operating and Technology Officer; both appointees took office. Additionally, the Sustainability Division is now part of the People Division, and the Efficiency Division is now part of the Strategy Division.

At a meeting on 30 October 2024, the Board of Directors appointed Mr. Sergio Alejandro Palavecino Tomé as Chief Financial Officer and General Manager of Banco Sabadell, subject to obtaining fit and proper clearance from the European Central Bank and with effect from that date. He was also appointed to the Management Committee. On 15 January 2024, the appointee was cleared by the European Central Bank as fit and proper for the intended office.

At a meeting on 23 July 2025, the Board of Directors granted Ms. Virginia Zafra de Llera, Communication and Corporate Image Manager, the status of General Manager, subject to obtaining fit and proper clearance from the European Central Bank and with effect from that date. She was also appointed to the Management Committee of Banco Sabadell. On 8 October 2025, the appointee was cleared by the European Central Bank as fit and proper for that office.

Total remuneration of senior management (*) and the head of internal audit (thousand euro)	8,625
Combined contributions to pension plans, structured through insurance policies, in 2025 (thousand euro)	1,000

(*) This includes amounts accrued that are not subject to deferral.

3.12. Indemnities, guarantee clauses and golden handshakes agreed between the Bank and its directors, executives or employees (C.1.39)

- 42 beneficiaries
- Description of beneficiaries:
CEO, CRO and 40 executives.
- Description of agreements:

The Chief Executive Officer's contract contains a post-contractual non-competition clause of two years' duration providing two years' fixed remuneration, including the portion of annual contributions to pension plans that are not classified as discretionary pension benefits, in the event of the Chief Executive Officer's termination due to (i) a decision by the Bank, without this being due to a breach of the Chief Executive Officer's duties, or (ii) a change of control; and a non-competition clause of one year's fixed remuneration and one year's duration for all other cases. The application of this non-competition clause is limited geographically to Spain, the United Kingdom and Mexico, where the Bank's main activity is concentrated. The CRO's contract contains a post-contractual non-competition clause with a duration of two years, applicable at most up to the first date of ordinary retirement, providing for two years' fixed remuneration.

The 2025 Director Remuneration Report, available on the website www.grupobancosabadell.com under "Corporate Governance and Remuneration Policy", contains more details of the executive directors' contracts.

There are 29 executives whose contracts contain a clause providing indemnity, in addition to that provided by law, in the amount of up to two years' fixed remuneration for cases of unfair dismissal and some limited cases of change of control. Seven other executives have a post-contractual non-competition clause with a duration of two years, lasting at most until the first date of ordinary retirement, that provide the amount of two years' fixed remuneration, and the contracts of four executives contain a clause providing indemnity, in addition to that provided by law, of up to one year's fixed remuneration in the event of unfair dismissal and a post-contractual non-competition clause for a maximum of one year until the first date of ordinary retirement that provides the amount of one year's fixed remuneration.

These contracts have been notified to and/or approved by the Board of Directors, and the General Meeting of Shareholders is informed of these clauses.

3.13. Audit of the financial statements (C.1.27, C.1.28, C.1.30, C.1.31, C.1.32, C.1.33, and C.1.34)

The 2025 separate and consolidated financial statements of Banco Sabadell are certified beforehand by the Chief Executive Officer and Chief Financial Officer.

The Bank draws up the separate and consolidated financial statements such as to present a true and fair view of net worth, financial situation and results of Banco Sabadell and the Group, by applying generally-accepted accounting principles to all the financial and accounting information, so that the financial statements are drawn up in accordance with current accounting standards.

The Audit and Control Committee reviews Banco Sabadell's financial statements, both separate and consolidated, before referring them to the Board, and exercises vigilance to ensure compliance with the law and the proper application of generally-accepted accounting principles. To this end, it holds regular meetings with the external auditors in order to be informed punctually about the audit process and to be aware sufficiently in advance of any discrepancies or differences of opinion. In the event of a discrepancy that might lead to a qualification in the auditors' report, the committee seeks to resolve it before the financial statements are authorised. The auditors attend the Board meeting to report on the degree to which the financial statements conform to the accounting standards.

If a material discrepancy cannot ultimately be resolved before the financial statements are authorised, the annual report of the Audit and Control Committee must expressly describe the discrepancy and its position in connection with it.

At a meeting immediately before the Board of Directors meeting, the Audit and Control Committee was informed that the auditors' reports on the separate and consolidated financial statements for the year 2025 will be unqualified.

In addition, the financial and non-financial information reported in the financial statements undergoes a certification process to provide greater robustness to the control framework for the preparation of accounts. This process is articulated through 3 levels of certification and flows hierarchically through the organization to the members of the Management Committee.

In connection with the external auditors, article 65 of the Articles of Association provides that the Audit and Control Committee has the following competencies:

- "4. Proposing to the Board of Directors, for submission to the General Meeting of Shareholders, the appointment or re-appointment of the external auditor, establishing the engagement conditions, the scope of the professional mandate, and revocation or non-renewal, if appropriate; reviewing compliance with the audit contract, and obtaining regular reports from them about the audit plan and its execution, as well as striving to ensure their independence in the performance of their functions and to ensure that the opinion on the financial statements and the main content of the auditors' report are drafted clearly and accurately.
- 6. Establishing the appropriate relations with external auditors to receive information about any issues that might jeopardise their independence, to be reviewed by the Committee, and any other information or communiqué related to the process of performing the audit functions and in the audit rules."

The Board of Directors Regulation expresses itself in similar terms; article 34 provides that: "Relations between the Board and the company's external auditors shall be channelled through the Audit and Control Committee."

The Audit and Control Committee was made up exclusively of independent directors. The Committee's Regulation that was current in 2025 includes the provisions of the Articles of Association and the Board of Directors Regulation; article 8.4 provides that, as directors and members of the Committee, those members must act with independence of opinion and action with respect to the rest of the organization (...).

On 19 April 2016, the Audit and Control Committee approved the Group's policy for safeguarding the auditor's independence, in conformity with Law 22/2015, of 20 July 2015, on Auditing, and with Regulation (EU) No 537/2014, of 16 April. The latest revision was approved by the Board of Directors on 5 February 2026 based on a recommendation by the Audit and Control Committee. This policy is applied in procedures that provide measures to preserve the independence of the statutory auditor by overseeing potential situations of incompatibility due to personal situations, prohibited services, rotation requirements and fee limits, as well as measures in the selection, appointment, re-appointment and replacement of the statutory auditor and the processes for approving all of the statutory auditor's services, particularly the authorization of non-audit services that the statutory auditor is not prohibited from providing.

In accordance with the regulations governing auditing and the system of approvals adopted by the Committee as reflected in the Banco Sabadell Group policy to safeguard auditor independence, proposals to engage services other than auditing from KPMG were submitted for approval by the Group's Audit Committees, which assessed whether such engagements were permissible as well as any threats and the necessary safeguards, including the impact of the limits established in article 4.2 of Regulation (EU) 537/2014 referred to above.

Additionally, via written confirmation of their independence received from the auditors prior to the issuance of the auditors' report, the Committee assessed the procedures and tools used by the firm to ensure compliance with the auditor independence regulations.

Based on the results of these verifications, the Committee issued a report expressing a favourable opinion on the independence of the statutory auditor prior to the issuance of the audit report on the financial statements, stating the reasons for the provision of each and every one of the services other than the statutory audit, considered individually and as a whole, and in relation to the rules governing independence and the regulations governing the audit of the annual accounts.

Banco Sabadell complies with the principles of transparency and non-discrimination set out in the current legislation with respect to other market players. Specifically, Banco Sabadell: i) takes care not to provide financial analysts with any information that might put them in a position of privilege with respect to other market participants, ii) regularly uses the services of four prestigious rating agencies (Fitch, DBRS, Moody's and Standard and Poor's), and iii) where Banco Sabadell receives advice from investment banks in certain transactions and, in the course of providing those services, such investment banks become privy to inside information, the institution includes the persons who become privy to such information in its internal control systems, and expressly notifies such persons of the obligation to fulfil their duty of confidentiality and comply with any trading restrictions, and ensure that others comply with them too.

Additionally, Banco Sabadell conforms to the rules set out in its General Policy on Conflicts of Interest that was approved by the Board of Directors, whose ultimate and fundamental objective is that the persons who are bound by it should act in accordance with the ethical norms and principles that govern the Bank's activities, based on the following guidelines:

- Existence of measures to prevent conflicts of interest from arising.
- Where conflicts of interest arise or are going to arise, existence of measures that enable them to be detected for the purpose of registering them and addressing them immediately.
- Where conflicts arise, they must be eliminated; otherwise, steps must be taken to reveal their nature and origin to the customer or the decision-making bodies, as appropriate, for the appropriate decisions to be made.

Banco Sabadell also acts in accordance with the principles established in the Banco Sabadell Policy on Outsourcing of Functions, approved by the Board of Directors.

3.13.1. External audit

During 2025, Banco Sabadell was audited by KPMG Auditores, S.L. (hereinafter, KPMG), the sixth year with this auditor. On 20 March 2025, based on a proposal by the Board of Directors, the Ordinary General Meeting of Shareholders resolved to re-appoint that firm as auditors of the Bank and of the consolidated financial statements of its group for 2025, and this was disclosed via a regulatory disclosure with registration number 33.587.

The audit firm performed work for Banco Sabadell other than auditing, the fees for which in relation to the fees billed to the Company and Group for audit work are as follows:

	Separate	Consolidated	Total
Fees for work other than auditing (thousand euro)	786	118	904
Fees for work other than auditing / Total audit fees (%)	25.59%	1.61%	8.67%

The amount of fees for work other than auditing does not include audit-related services requested from the auditor in compliance with the applicable regulations amounting to €109 thousand (€100 thousand corresponding to the Company and €9 thousand corresponding to Group subsidiaries).

The number of consecutive years that the current audit firm has been auditing the separate and consolidated financial statements of Banco Sabadell and the number of years audited by the current firm in relation to the total years in which the financial statements have been audited are as follows:

	Separate	Consolidated
Number of consecutive years	6	6
No. of years audited by the current audit firm / No. of years that the company or its group has been audited (%)	13.33	14.63





4. Board of Directors Committees (C) (C.2.1 and C.2.3)

There are currently six operational Board of Directors committees with the functions defined in the Articles of Association and the Board of Directors Regulation, which are elaborated upon and complemented by the committees' specific terms of reference. The current versions of those documents are available on the website www.grupobancosabadell.com, in the section on "Corporate Governance and Remuneration Policy".

The Committees have sufficient resources to perform their functions, can draw on external advice and are entitled to obtain information about any aspect of the institution, with unrestricted access to senior management and Group executives and to any type of information or documentation at the Bank's disposal in connection with the matters within their competency.

All Board committees draw up an annual assessment report on their activities, which is submitted to the Bank's Board of Directors for evaluation. At least once every three years, the assessment must be carried out with the assistance of an external consultant. Since 2022 was the last year for which an external consultant was engaged for this purpose, the assessment for 2025 was performed with the assistance of an external consultant early in 2026.

Additionally, all the Board Committees draw up annual reports on their functions and activities, which are available on the website www.grupobancosabadell.com in the section on "Corporate Governance and Remuneration Policy".

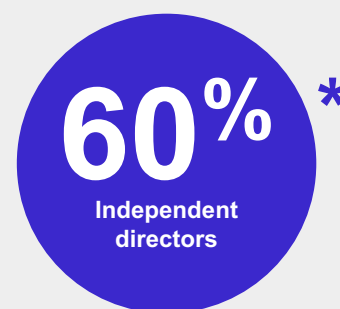


4.1. Strategy and Sustainability Committee

S&
SC

Composition and meeting attendance

			Meetings
Chairman	Josep Oliu Creus	Other external	14/14
Members	Lluís Deulofeu Fuguet	Independent	14/14
	Pedro Fontana García	Independent	14/14
	María José García Beato	Other external	14/14
	César González-Bueno Mayer ⁽¹⁾	Executive	14/14
	George Donald Johnston III ⁽²⁾	Independent	11/14



(1) Member solely for matters of strategy.

(2) The director granted a proxy for the meetings from which he was absent.

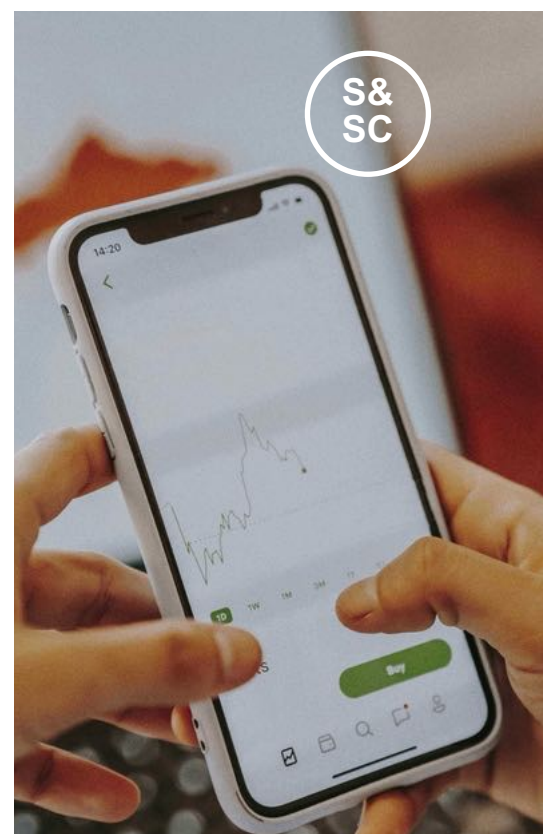
(*) In matters of Sustainability, independent directors account for 60 % of the committee, while in matters of Strategy they account for 50 %.

Regulation and functioning

The Strategy and Sustainability Committee is regulated by article 63 of the Articles of Association and article 14 of the Board of Directors Regulation, and it has its own terms of reference approved by the Board of Directors on 27 May 2021 that regulate its organization and functioning.

In accordance with the Board of Directors Regulation, the Strategy and Sustainability Committee comprises at most five directors appointed by the Board of Directors, none of whom may be an executive director, with a majority of independent directors. The Chairperson of the Committee shall be the Chairperson of the Board of Directors. In matters of strategy, the Chief Executive Officer shall participate in the meetings with the right to speak and vote, and, for this purpose, the Board shall be composed of six members. The Secretary of the Board of Directors or, as appropriate, the Deputy Secretary of the Board, acts as its Secretary.

The terms of reference of the Strategy and Sustainability Committee establish that the members of the Committee possess the appropriate knowledge and experience in the light of the tasks they will be required to perform, and that some of them must have specific experience in the following areas: strategy, banking, digital transformation, international and sustainability. Efforts will be made to promote diversity, in terms of gender, professional experience, skills, sectoral knowledge, international experience and geographical origin in the appointment of members of the Committee. The Committee shall meet as often as necessary and at least once every three months, when convened by its Chairperson, at his own initiative or at the initiative of any member of the Committee, or whenever the Board or its Chairperson requests the issuance of a report or the adoption of proposals and, in any case, whenever it is appropriate for the proper performance of its functions.



Functions

Without prejudice to the other duties assigned to it by law, the Articles of Association, the Board of Directors, the Board of Directors Regulation or its own terms of reference, the Strategy and Sustainability Committee has the following basic duties:



On strategy:

1. To evaluate, propose and recommend to the Board of Directors actions of strategic relevance in matters of growth, development, diversification, business transformation and technology of the Company.
2. To inform and advise the Board of Directors on the long-term strategy of the Company, identifying new opportunities for value creation and submitting to the Board of Directors corporate strategy proposals in relation to new investment or divestment opportunities, financial transactions with a material accounting impact and material technological or organizational structural transformations. To study and propose recommendations or improvements to the strategic plans and their updates that are submitted to the Board of Directors from time to time.
3. To issue and submit to the Board of Directors, on an annual basis, a report containing the proposals, evaluations, studies and work carried out by the Committee in relation to the foregoing matters.

On sustainability:

1. To review the Company's sustainability and environmental policies, and inform the Board of Directors of possible modifications and periodic updates of the sustainability strategy.
2. To review the definition and modification of diversity and integration, human rights, equal opportunities and work-life balance policies and to periodically evaluate their degree of compliance.
3. To review the Bank's social action strategy and its sponsorship and patronage plans.
4. To review and report on the statement of non-financial information, prior to its review and report by the Audit and Control Committee and its subsequent adoption by the Board of Directors.
5. Receiving information in connection with reports, written communiqués or communications from external supervisory bodies within the scope of this Committee's competencies.
6. To oversee the model for identifying, monitoring and managing sustainability risks and opportunities, including, where appropriate, environmental and climate change risks.

Activities during the year

The main issues that arose in relation to the matters within the Committee's remit and the main activities carried out by the Committee in 2025 are described below:

On strategy:

Actions with an impact on strategy

- The Strategy and Sustainability Committee was the Board Committee entrusted with monitoring the takeover bid made by BBVA. Accordingly, it was kept up to date on material issues at each stage of the takeover bid, and on any developments arising in this connection.

The Committee closely monitored the entire process of the takeover bid at its regular meetings, and was kept apprised of the progress and issues related to the process, including legal, financial and communication aspects, as well as any impact on the Bank's business. It monitored the issue of the takeover bid in depth, specifically with regard to the related disclosures and the CNMC's decision-making process.

- The Strategy and Sustainability Committee was also the Board Committee entrusted with monitoring the process of divesting TSB.
- It reviewed and evaluated the corporate projects and strategic transactions in matters of growth, development and diversification, and the business transformation and technological transformation projects implemented by the Bank, and issued a favourable report to the Board. In relation to strategic projects and those related to business or technological transformation, the Committee held intense discussions that resulted in a number of actions: that they be reviewed, where this was considered to be necessary; or that they be submitted for approval to the Board of Directors, based on a recommendation by the Committee itself, in cases where such projects required a decision by the Board. Additionally, when deemed appropriate, project monitoring measures were implemented with the appropriate frequency. In particular, it oversaw, debated and tracked the technology transformation and the projects arising from it, because of the Committee's high degree of specialisation in this area.
- It monitored the Group's non-recurring projects, in accordance with the policies, and performed the pertinent analyses of each project, with special emphasis on the opinion of the 2nd line of defence (2LoD). In this regard, the Committee debated all significant projects and followed up appropriately.
- It tracked and monitored the Strategic Plan in compliance with the Banco Sabadell Group's Strategic and Financial Planning Policy, among others, by regularly monitoring the KPIs of the Strategic Plan and Operating Plans, on which it issued a favourable report to the Board of Directors for approval each year. It also reported favourably to the Board of Directors on the approval of the 2025 budget, the update of the Group's financial projections for 2025-2029, and the subsequent update to take account of the potential sale of TSB. Additionally, following analysis and discussion, it reported favourably on the (preliminary) 2026-2030 Financial Projections and the Risk Assessment.
- With regard to monitoring business units, topics discussed included the formalisation of the agreement with Nexi and the Disaster Recovery testing plan. Customer acquisition and retention processes were monitored.



- As for the strategy with regard to subsidiaries, the Committee was kept informed of product performance and the current situation in Mexico, including notably the latest developments in connection with the digital account for private individuals and progress with Banco Sabadell Mexico's plans. Additionally, in connection with the strategy with regard to subsidiaries, the Committee informed the Board of the bids received for TSB, took cognizance of the binding bids that were received, and advised favourably on, among other aspects, the acceptance of Santander's binding bid and the execution of the contractual documentation for the transaction, as well as the arrangement of an Extraordinary General Meeting to: authorise the sale of TSB and other equity instruments and securities issued by TSB. It also issued a favourable report (together with the favourable report by the Risk Committee) to the Board of Directors of Banco Sabadell on the approval of the UK subsidiary TSB's Medium Term Plan 2025, which contained an update of TSB's financial projections for the period 2026-2030.
- As part of a strategic review, following the Board of Directors' agreement in December 2024 on the need for a new 2025-2027 Plan for when the takeover bid had concluded, as well as the start of the working sessions in the strategic review with this objective in mind, the various factors, both internal and external to the Group, have been analysed in order to define the Strategic Framework and subsequently the Key Programmes of the new Strategic Plan. This strategic reflection process culminated in July 2025 when the committee recommended that the Board of Directors adopt Banco Sabadell's 2025-2027 Strategic Plan, which was presented at a Capital Markets Day on 24 July 2025 and communicated to the CNMV on that same day in the form of a disclosure of Inside Information. In addition, the Committee was informed of strategic initiatives that are being carried out to implement the Strategic Plan.
- Regarding shareholder remuneration, at meetings in October and November 2024, the Committee analyzed in depth and discussed possible scenarios for shareholder remuneration, taking into account the current regulatory framework, capital requirements, Banco Sabadell's comfortable capital position, compliance with MREL requirements and the comparison with peers. Based on the scenarios presented and after analyzing and discussing possible shareholder remuneration formats, governance, the procedure for authorizing a share buyback and the various dividend scenarios, the Committee decided to propose a shareholder remuneration structure and submitted it to the Board of Directors for consideration and adoption and for submission to the General Meeting of Shareholders for approval.

It also analysed and reviewed the Shareholder Remuneration Policy, which establishes the framework governing the decisions by the Board of Directors, and it reported favourably to the Board of Directors on updating that policy, which was subsequently submitted to the General Meeting of Shareholders for review and approval.

In this regard, considering the divestment of TSB, an in-depth strategic review was also carried out that contemplated distribution of the 2025 dividend. This process culminated in the proposal to the Extraordinary General Meeting of Shareholders on 6 August 2025 at 13.00 that consisted of the approval of an extraordinary cash dividend of 50 euro cent (gross) per share charged to unrestricted voluntary reserves, subject to the sale by Banco de Sabadell, S.A. to Banco Santander, S.A. of the entire share capital of the Banco Sabadell subsidiary TSB Banking Group plc and other capital instruments and securities issued by the latter (authorisation of which had been laid before the Extraordinary General Meeting of Shareholders of Banco Sabadell held on 6 August 2025 at 10.00),

payable on the last business day of the month following receipt of the sale price.

In addition, at its September meeting, the Committee discussed different shareholder remuneration scenarios in accordance with Banco Sabadell's Shareholder Remuneration Policy, which provides for the distribution of a second interim dividend in December, payable on 29 December 2025. It also analysed the announcement of the second interim dividend and issued a positive recommendation in this regard to the Board of Directors. In this regard, a proposal was submitted to the Committee for an announcement to the markets of an improvement in shareholder remuneration for 2025 from 1.3bn to around 1.45bn.

- The Committee discussed and reported favourably to the Board of Directors on the establishment of a new share buyback programme for a maximum cash amount of €755 million and the reactivation of the share buyback programme that had been suspended temporarily in May 2024 following the announcement of the takeover bid, for the amount not yet executed (at most €247 million), which were subsequently submitted to the General Meeting of Shareholders for approval.

Subsequently, in May, it reported favourably and submitted to the Board of Directors the proposal to implement the resolution to reduce share capital and amend the Articles of Association, within the framework of the Reactivated Buyback Programme, and it took cognizance of the commencement of the Second Buyback Programme 2025.

- The Committee was informed of the latest macroeconomic developments and forecasts, and the announcements of new tariffs by the Trump Administration after "Liberation Day", focusing specifically on the central and the downside scenarios.
- The Committee was briefed on the state of affairs in cybersecurity.
- It was informed about the progress of the corporate Artificial Intelligence (AI) programme launched in 2023.
- It monitored the Operations and Technology Plan, reviewing the operational and technology initiatives in connection with individual customers with the objective of acquiring new customers, obtaining their loyalty and transforming this business segment; it also oversaw the areas of corporate banking and recoveries, and key initiatives in technology, focusing particularly on cybersecurity.
- It was informed of the tax on net interest and commission income of certain financial institutions (IMIC) created in December 2024.
- Also, as a specific item of business, the Committee received an update on the BS Capital area, and carried out an in-depth analysis and reflection on that area, noting its successful track record and the upcoming planned actions.

Policies

After reviewing the proposed changes to the following policies, it reported favourably to the Board of Directors on the revisions to the Shareholder Remuneration Policy, which was submitted to the General Meeting of Shareholders for review and approval and is available to shareholders on the corporate website, the Banco Sabadell Group Financial and Non-Financial Information Disclosure Policy, the Banco Sabadell Group Strategic and Financial Planning Policy, the Banco Sabadell Significant Changes and Exceptional Transactions Policy, and the Banco Sabadell and Banco Sabadell Group Non-Financial and Corporate Communication Policies.



On sustainability:

Progress as a sustainable bank

- The Committee regularly monitored the Bank's progress in the area of ESG by reviewing the Corporate Sustainability Report, which provides details on, among other things, the global ESG environment in the context of the macroeconomic and regulatory environment, the Bank's ESG Vision, the integration of ESG risks into management, and the Bank's recognition in terms of disclosure and rating agencies.

In its periodic review of the Corporate Sustainability Report (ICS), the Committee was informed of the Bank's sustainable development, including through the Sustainability Indicator report and compliance with the Sabadell Sustainable Commitment objectives, as well as the key aspects of the composition of the Group's sustainable financing portfolio, ESG risk management and other ESG advances made by the bank, such as its recognition by Time magazine as one of the 500 most sustainable companies in the world and by S&P Global as one of the leading banks in ESG performance.

The Committee was informed of developments in the ESG space, notably the publication of the EBA's final Guidelines on the Management of ESG Risks, applicable from 11 January 2026; the approval by the Net Zero Banking Alliance (NZBA) of new guidelines that relax the framework for action to facilitate the transition; the publication of Royal Decree 214/2025 of 18 March, which created the register of carbon footprints, offsets and carbon dioxide capture projects and established the obligation to calculate the carbon footprint and to draw up and publish greenhouse gas emission reduction plans; and the EU's progress towards greater alignment between the defence industry, industrial policy and sustainable finance, among others.

- The Committee was informed of the outcome of the supervisory assessment of climate and environmental risk disclosure.
- The Committee reported favourably to the Board of Directors on the "Prudential Transition Plan". That Plan was prepared based on the requirements established in the final Guidelines on the Management of ESG Risks published by the EBA in January 2025, which apply from 11 January 2026 and require the definition of a transition planning process towards a sustainable economy. The Prudential Transition Plan is structured into the following six chapters: (i) Introduction and context; (ii) Strategic objectives and roadmap; (iii) Targets and metrics; (iv) Governance; (v) Implementation strategy; and (vi) Engagement strategy; plus an additional section setting out future action plans.

Stakeholder engagement

- The Committee was informed of communications from supervisory bodies within the scope of its competencies.
- The Committee was informed of the opinions of analysts and investors following the quarterly earnings presentation and earnings roadshows, as well as feedback regarding BBVA's takeover bid, the Corporate Governance and Sustainability Roadshow held outside the AGM season, and Capital Market Day.
- The Committee was informed of developments in the Net Zero Banking Alliance (NZBA), of which the Bank has been a member since October 2021, and forwarded this information to the Board of Directors.



Policies and reports

- It reviewed and reported favourably to the Board of Directors on the Group's Sustainability Policy, the Banco Sabadell ESG Risk Integration Policy in Savings and Investment Products, the Human Rights Policy, the Banco Sabadell Group's Defence Sector Policy, and the Banco Sabadell Group Internal Control System Policy for Sustainability Information.
- It provided input for the the Group's Sustainability Report, prepared for the first time in accordance with the European Sustainability Reporting Standards (ESRS), adopted by the European Commission in the form of a Delegated Regulation (2023/2772). Since, as of January 2025, the Corporate Sustainability Reporting Directive (CSRD) had not yet been transposed, a Non-Financial Information Statement for 2024 was drawn up in accordance with Law 11/2018, responding to the contents of the law; also, on a voluntary basis and in line with the recommendations of the Instituto de Contabilidad y Auditoría de Cuentas (ICAC) and the CNMV, the sustainability content was reported in accordance with the CSRD, thus complying with European standards. The report was then reviewed and vetted by the Audit and Control Committee and subsequently adopted by the Board of Directors.

In this context, and following a new materiality analysis based on a double materiality approach, the Committee reported on the changes made in 2025 to the double materiality analysis, thereby complying with the internal audit recommendation to keep the governing bodies informed of updates to the Group's double materiality analysis.

Social outreach and patronage strategy

- The Committee recommended that the Board of Directors ratify the signature of the extension of the agreement for the creation of a Social Housing Fund that Banco Sabadell signed in January 2013 together with representatives of the Government, other credit institutions and various political and social institutions, and which has been extended each year since then, as the circumstances that gave rise to its creation still persist.
- The Committee was informed of the activities of Fundación Privada Banco Sabadell and, after analysing the social initiatives and sponsorships reported by the foundation, it reported favourably to the Board of Directors on the contribution to the foundation to fund its plan of action for 2026. The plan includes several notable projects in the foundation's lines of action: (i) Research and Education; and (ii) Culture and Arts. The unique Sabadell Cultural Centre project is also noteworthy.

The alliances between the Banco Sabadell Group and Fundación Privada Banco Sabadell are based on four pillars: (i) Activities and volunteer work by employees; (ii) Activities for high-value customers and significant institutions in the region; (iii) BS historical archive; and (iv) BS collection.

Assessment

- It approved the Report on the Performance and Activities of the Strategy and Sustainability Committee for 2024, which was submitted to the Board of Directors and published on the corporate website sufficiently in advance of the date of the General Meeting of Shareholders, thus complying with best practices in the field of corporate governance.

- It approved and submitted to the Board of Directors the Self-Assessment Report of the Strategy and Sustainability Committee for 2024, without specifying any action plan for 2025. The report concluded that, with regard to the Strategy and Sustainability Committee, throughout 2024 Banco Sabadell adequately performed its duties and fulfilled the responsibilities assigned to it by the Articles of Association, the Regulations of the Board of Directors and its own Regulations, as well as all those assigned to it by the relevant Policies.

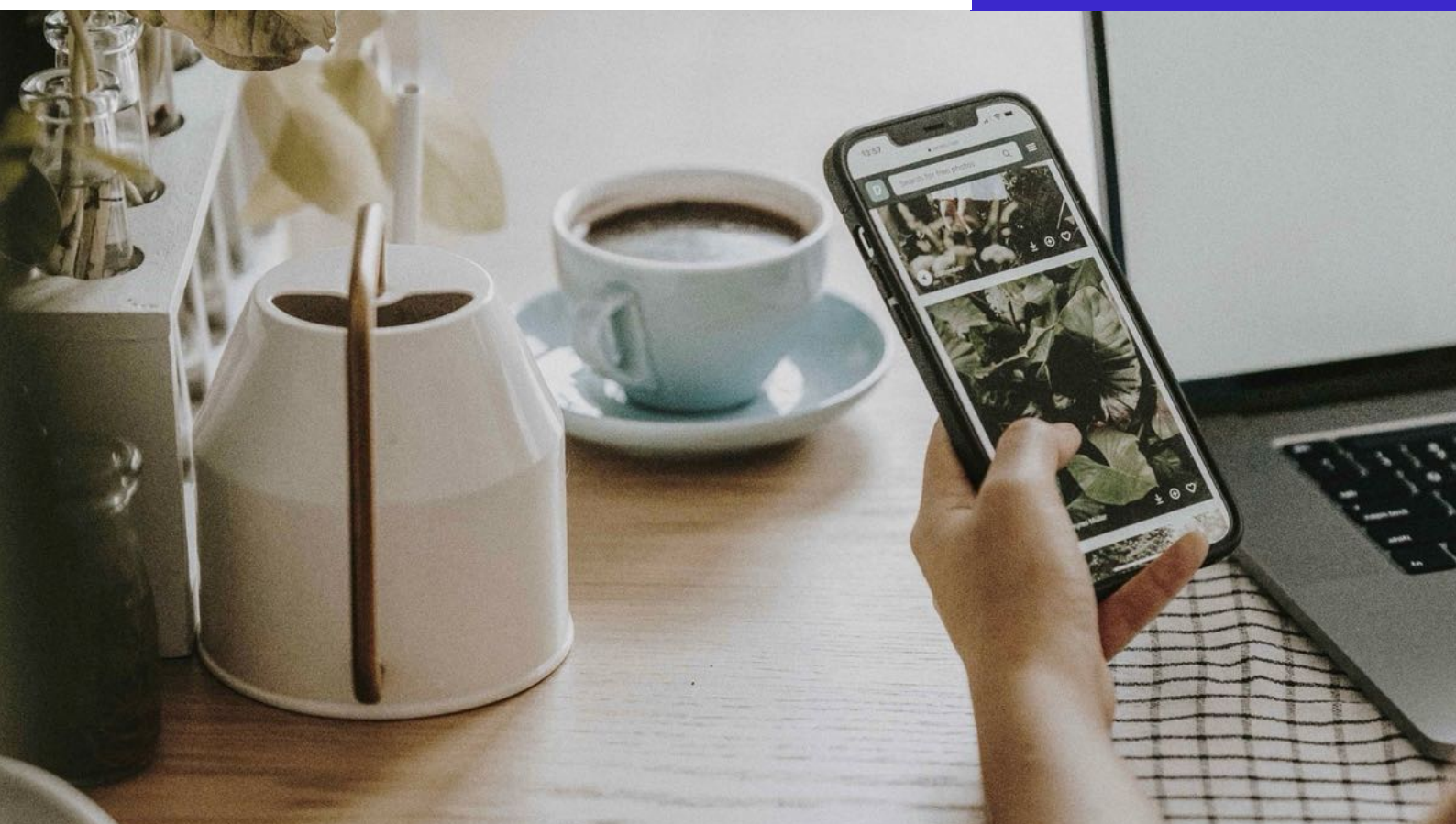
Other functions

- The Strategy and Sustainability Committee reviewed its Activities Plan for 2025, which set out the mandatory issues to be discussed at the meetings proposed in the year and indicated the purpose required in connection with each issue.
- It approved the schedule of Strategy and Sustainability Committee meetings for 2026.

Additionally, in January 2026, the Strategy and Sustainability Committee assessed its performance in 2025 with the assistance of an external consultant, with satisfactory results.

Every month, the Committee produces extensive information on the proposals, evaluations, studies and work that it carries out in relation to the foregoing matters at its meetings during the month, and submits it to the Board of Directors.

More information is available in the Report on the activities of the Strategy and Sustainability Committee in 2025, which is available in the "Corporate Governance and Remuneration Policy/Committee Reports" section of the Bank's corporate website (www.grupobancsabadell.com).

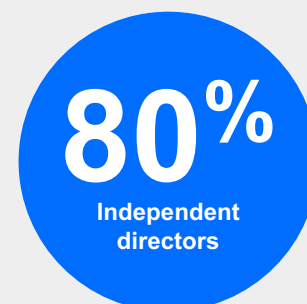


4.2. Credit Delegated Committee



Composition and meeting attendance

			Meetings
Chairman	Pedro Fontana García	Independent	38/38
Members	Lluís Deulofeu Fuguet ⁽¹⁾	Independent	36/38
	César González-Bueno Mayer ⁽¹⁾	Executive	21/38
	Mireya Giné Torrens ^{(1) (2)}	Independent	22/24
	Alicia Reyes Revuelta ^{(1) (2)}	Independent	5/9
	Pedro Viñolas Serra ⁽¹⁾	Independent	36/38



(1) The directors granted a proxy for the meetings from which they were absent.

(2) Number of meetings which the directors attended with respect to the number of meetings held during the period in 2025 in which they were members.

On 20 March 2025, Ms. Alicia Reyes Revuelta stepped down as a member of the Credit Delegated Committee as a result of her decision not to stand for re-election as a director.

On 28 April 2025, Ms. Mireya Giné Torrens was appointed as a member of the Credit Delegated Committee.

Regulation and functioning

The Credit Delegated Committee is expressly regulated by article 64 of the Articles of Association and article 15 of the Board of Directors Regulation, and it has its own terms of reference approved by the Board of Directors on 27 May 2021 that regulate its organization and functioning.

In accordance with the Board of Directors Regulation, the Credit Delegated Committee comprises at most five directors, a majority of whom must be independent directors, appointed by the Board of Directors with the favourable vote of two-thirds of its members. The Board will appoint the Committee Chairman from among its members. The resolutions of the Committee must be entered in a minutes book, and the minutes must be signed by the Chairman and the Secretary or, where applicable, by those who played those roles at the meeting in question.

It must meet whenever convened by its Chairman, and its meetings may be attended by any person who is invited to attend and speak, by a decision of the Committee itself or the Chairman of same, for the purposes to be determined on the basis of the matter in question; the Secretary of the Board of Directors, or the Deputy Secretary, will act as the Committee Secretary.

Functions

The functions of the Credit Delegated Committee are to analyze and, as appropriate, decide upon transactions in accordance with the cases and limits established by express delegation of the Board of Directors. In particular, the following are included:

1. Risk admission decisions: Transactions amounting individually to €80 million or more, up to at most €350 million. For the General State Administration, Autonomous Regional Governments and Local Governments, transactions amounting individually to €150 million or more, up to at most €350 million. Risks amounting to €125 million or more at Group level and up to at most €500 million.



2. Within the limits of the previous item, decisions to refinance and restructure risks with gross write-offs of between €15 million and €40 million.
3. Decisions to sell foreclosed assets with a gross asset value (GAV) of €50 million or more and a gross loss per transaction of between €15 million and €40 million.
4. Exceptionally, decisions exceeding the above thresholds, whenever necessary for reasons of urgency, must be submitted for subsequent ratification by the Board of Directors.
5. To report to the Board of Directors on all credit operations that must be approved by the Board.
6. To be informed of transactions approved by the relevant credit committees and to be submitted to the Board for information.
7. To report on and monitor those matters within the competence of the Board of Directors relating to credit risk.

The Board may require the Committee to prepare reports on matters within its sphere of action.

Activities during the year

The main issues that arose in relation to the matters within the Committee's remit and the main activities carried out by the Committee in 2025 are described below:

Decisions on loan acceptance and the sale of foreclosed assets

- The Committee adopted, or reported favourably to the Board of Directors, as appropriate, decisions on risk admission, risk refinancing and restructuring, and the sale of foreclosed assets within the foregoing cases and limits established by the Board of Directors, it reviewed the risk limits granted to large groups in 210 cases (reporting favourably to the Board in 45 cases, and directly approving them in 165 cases) and it analyzed over 103 transactions with companies and public sector institutions (reporting favourably in 5 cases and directly approving in 98 cases).

The Committee's prior analysis of the companies with respect to which it makes decisions takes sustainability indicators into account. In this context, the company's classification, alignment and compliance with ESG (Environmental, Social & Governance) guidelines is reported, as is its alignment or non-compliance with industry guidelines; and its compliance with industry regulations. The company's Climate and Environmental Risk Indicator (IRCA) is also reported. The purpose of that indicator is to objectively position companies that are required to produce a Sustainability Report based on their exposure to climate and environmental risks, and their maturity in managing them.

- The Committee reported favourably to the Board of Directors on the Annual Review of Country Limits for Commercial and Financial Transactions and Sovereign Debt Limits.
- The Committee approved or reported favourably to the Board of Directors on the review of the risk facilities for financial institutions.

Reports to the Board of Directors and follow-up

- The Committee was informed of all the transactions approved in 2025 that involved underwriting risk, and tracked them in great detail, in accordance with the provisions of the Underwriting Framework.
- The Committee reported favourably to the Board of Directors on all credit transactions requiring Board approval, including credit transactions with directors and senior management, in which case the specific rules on avoidance of conflicts of interest as set out in the pertinent Policy were applied, and it also advised the Board of Directors on transactions with their related parties.
- In compliance with the Policy on Conflicts of Interest and Related Party Transactions in Relation to Directors and Senior Management of Banco Sabadell, the Committee was informed of the transactions within its remit (credit, refinancing and restructuring transactions, sale of foreclosed assets, etc.) when they required approval by the Committee because of their amount or where the provisions of the Banco Sabadell Credit Risk Admission Policy require that the Committee be informed and authorise them, where they might qualify as related-party transactions, by means of the corresponding report from Compliance (independently of any authority of approval that may apply to a credit transaction by reason of its amount). At all events, the committee was informed, by means of a reasoned report by the Compliance Division (without prejudice to the powers to approve credit transactions on the basis of their amount), in the case of transactions where a director or senior manager of Banco Sabadell, or any of their related parties, is a member of the borrower's Board of Directors, provided that the exposure exceeds €1,000,000.
- The Committee exhaustively monitored "single names", considering those positions with higher risk limits and identifying the Bank's top 50 borrowers from the standpoint of concentration risk, and the top 25 borrowers classified as Stage 2 and as Stage 3, and the main exposures and provisions. The Committee also deemed it necessary to focus on several sectors: (i) it monitored exposure to renewable energy in the US, analysing the impact of the election results in the country on Sabadell Miami's renewable energy portfolio; and (ii) it monitored the effects of the flash floods in Valencia, reporting on the status of credit extended in the Valencia Autonomous Region and reporting that the impact of the floods on the loan book was much lower than had been expected initially.
- It was informed of transactions approved by lower-level credit committees (Group Risk Transactions Committee and Restructuring and Recovery Transactions Committee) within the cases and limits established by the Board that must be reported to the Board.
- In accordance with its terms of reference, the Committee approved urgent transactions on an exceptional basis, reporting on them in full to the Board, which ratified them subsequently.
- The Committee monitored the LatAm portfolio, specifically exposures in the Peru, Colombia, Chile and Panama portfolios, and analysed the risks contained in those portfolios.
- The Committee approved, on an urgent basis, Banco Sabadell's adoption of the Spanish Official Credit Institution's Agreement on US Tariffs, and presented it for ratification by the Board of Directors.
- It also approved an action plan for refinancing exposure to Cuba and carried out the annual review of the credit and exposure to financial institutions in Cuba.



Assessment

- It approved the Report on the performance and activities of the Credit Delegated Committee for 2024, which was submitted to the Board of Directors and published on the corporate website sufficiently in advance of the date of the Ordinary General Meeting of Shareholders, thus complying with best practices in the field of corporate governance.
- The Committee approved and submitted to the Board of Directors the Self-Assessment Report of the Credit Delegated Committee for 2024. No action plan was recorded for 2024. The report concluded that, as far as the Credit Delegated Committee is concerned, throughout 2024, Banco Sabadell properly discharged its duties and fulfilled the responsibilities assigned to it by the Articles of Association, the Regulation of the Board, its own Regulation and the applicable policies. For more details on the action plan and evaluation of the Committee, see the sections entitled "Plan of Action 2025" and "Annual evaluation of the performance of the Credit Delegated Committee".

Other functions

The Credit Delegated Committee reviewed its Activities Plan for 2025, which set out the mandatory issues to be discussed at the meetings proposed in the year and indicated the purpose required in connection with each issue.

Additionally, in January 2026, the Credit Delegated Committee performed an assessment of its performance in 2025 with assistance of an external consultant, with satisfactory results.

More information is available in the Report on the Credit Delegated Committee's activities in 2025, which is available in the "Corporate Governance and Remuneration Policy/ Committee Reports" section of the Banco Sabadell Group corporate website (www.grupobancosabadell.com).



4.3. Audit and Control Committee

A&
CC

Composition and meeting attendance

			Meetings
Chairman	Manuel Valls Morató	Independent	13/13
Members	Ana Colonques García-Planas	Independent	13/13
	Laura González Molero ^{(1) (2)}	Independent	2/4
	María Gloria Hernández García ^{(1) (2)}	Independent	5/6
	Margarita Salvans Puigbò ⁽²⁾	Independent	5/5
	Pedro Viñolas Serra ⁽²⁾	Independent	7/7



(1) The directors granted a proxy for the meetings from which they were absent.

(2) Number of meetings which the director attended with respect to the number of meetings held during the period in 2025 in which they were a member.

On 20 March 2025, Ms. Laura González Molero stepped down as a member of the Audit and Control Committee as a result of her resignation as a director.

On 29 May 2025, Mr. Pedro Viñolas Serra resigned as a member of the Audit and Control Committee.

On 29 May 2025, Ms. María Gloria Hernández García was appointed as a member of the Audit and Control Committee.

On 26 June 2025, Ms. Margarita Salvans Puigbò was appointed as a member of the Audit and Control Committee.

Regulation and functioning

The Audit and Control Committee is expressly regulated by article 65 of the Articles of Association and article 16 of the Board of Directors Regulation, and it has its own terms of reference that regulate its organization, functioning and governance and were last amended by the Board of Directors on 27 May 2021.

The members of the Audit and Control Committee and, in particular, its Chairman, have knowledge and experience in accounting and auditing.

In accordance with the Board of Directors Regulation, the Audit and Control Committee must comprise at most five directors, appointed by the Board of Directors, none of whom may be an executive director; at least a majority of them must be independent directors, and at least one of them must have been appointed on the basis of his/her knowledge and experience of accounting, auditing, or both; the members as a whole should have the necessary knowledge not only of accounting and auditing but also of finance, sustainability, internal control, information technology, risk management (both financial and banking).

The Board will appoint its Chairperson from among the independent directors that form part of it, with the vote in favour of two-thirds of its members. The Secretary shall be the Secretary of the Board of Directors or, as the case may be, the Deputy Secretary of the Board of Directors. The Chair will be replaced every four years, and can not be re-elected until one year has elapsed since his/her removal. The Secretary must take minutes of every meeting, which must be approved at the end of the meeting itself or at the next meeting. The business transacted at Committee meetings must be reported to the Board of Directors at the next meeting by means of a reading of the minutes.

A&
CC



The Committee must meet at least once every three months, and whenever convened by the Chairman at his/her own initiative or at the request of any Committee member, or at the request of the Chairman of the Board of Directors or of the external auditor.

Functions

The functions of the Audit and Control Committee include those defined in Article 65 of the Articles of Association of Banco Sabadell, those defined in Article 16 of the Regulations of the Board of Directors, and all those set out in the Regulation of the Audit and Control Committee and those attributed to it by law.

The Audit and Control Committee is attributed the following powers by the Articles of Association, and they may be elaborated upon by the Committee's own terms of reference:

1. To report to the general meeting on questions raised by shareholders in connection with matters within its purview and, in particular, on the outcome of the audit, explaining how the audit contributed to the integrity of the financial information and the role the committee played in this process.
2. To supervise the effectiveness of the company's internal control, the Internal Audit and the risk management systems, including those related to taxes, as well as to discuss the significant weaknesses of the internal control system detected in the performance of the audits with the auditors or audit firms, without affecting their independence. To this end, and where appropriate, to submit recommendations or proposals to the Board of Directors and the corresponding deadline for their follow-up.
3. To supervise the process of preparation and presentation of regulated financial and non-financial information and submit recommendations or proposals to the Board of Directors aimed at safeguarding its integrity.
4. Proposing to the Board of Directors, for submission to the General Meeting of Shareholders, the appointment or re-appointment of the external auditor, establishing the engagement conditions, the scope of the professional mandate, and revocation or non-renewal, if appropriate; reviewing compliance with the audit contract, and obtaining regular reports from them about the audit plan and its execution, as well as striving to ensure their independence in the performance of their functions and to ensure that the opinion on the financial statements and the main content of the auditors' report are drafted clearly and accurately.
5. To report, beforehand, to the Board of Directors on the financial information and the management report, which shall include the mandatory non-financial information that the Institution must periodically publish, as well as the quarterly and half-yearly financial statements and the prospectuses that must be submitted to the regulatory or supervisory bodies, monitoring compliance with legal requirements and the correct application of generally accepted accounting principles, as well as reporting on proposals to amend these principles.
6. To establish the appropriate relations with the external auditors in order to receive information on matters that may jeopardise their independence, the declaration at least once a year of their independence from the entity or entities related to it, directly or indirectly, and detailed itemized information on additional services of any kind rendered and the corresponding fees received from these entities by the external auditor, or by persons or entities related to the latter in accordance with the provisions of the regulations governing the auditing of accounts, for examination by the Committee, and any other information or communications related to

the process of auditing and auditing standards, as well as, where appropriate, authorization of services other than auditing and not categorized as prohibited, in accordance with the regulations on auditing of accounts.

7. To annually issue, prior to the issuance of the audit report, a report expressing an opinion on whether the independence of the auditors or audit firms is compromised, with a reasoned evaluation of the provision of each and every one of the additional services referred to in the previous item, individually considered and as a whole, other than the statutory audit and in relation to the independence regime or to the regulations governing the activity of auditing accounts.
8. To supervise the internal audit services, their independence and budget, reviewing their action plans and resources in order to ensure that they are appropriate for the Institution's needs; to propose, where appropriate, the appointment and replacement of the head of internal audit; and to verify that senior management takes into account the conclusions and recommendations of their reports.
9. To report on all matters which, within the framework of its powers, are submitted to it for consideration by the Board of Directors and, in particular, on the creation or acquisition of holdings in special purpose vehicles or entities domiciled in countries or territories considered tax havens and related-party transactions.
10. To perform its own functions for those subsidiaries of the Entity which, by application of their specific regulations at any given time, must have such bodies.
11. The Board may ask the Committee to prepare reports on matters within its remit.
12. All the other issues which are attributed to it by law or by the Articles of Association and regulations that implement them, and any resulting from the generally applied standards of good governance, and any resulting from regulations and codes of good governance applicable to the Company.

Activities during the year

The main issues that arose in relation to the matters within the Committee's remit and the main activities carried out by the Committee in 2025 are described below:

Functions relating to financial and non-financial disclosures

During the year, in line with the functions attributed to it, the Committee regularly monitored and analysed the sufficiency, clarity and integrity of all the financial and non-financial disclosures that the Bank made public, prior to their submission to the Board of Directors and dissemination to the market and supervisory bodies, and it tracked the main developments in this connection. These include the most significant judgements and estimates and valuation criteria used by the group to produce the 2025 financial statements.

The Committee's scope of oversight included the Pillar III Disclosures, the ICAAP and ILAAP, and the Universal Share Prospectus. The Committee also drafted and updated accounting policies and those relating to the internal control system for financial and sustainability reporting prior to submission to the Board of Directors for approval.

In relation to supervising the effectiveness of the system for internal control over financial and sustainability reporting in accordance with the requirements established by the applicable regulations, it assessed the reports by those responsible for its design, implementation, management and operation, by internal audit and, in the specific case of ICFR, also by the internal control function, as well as the external auditor.

The Committee reviewed the proper application of good banking, accounting and sustainability practices in the various echelons of the organization, ensuring, through reports from the heads of the Bank's internal control functions and from the external auditor, that suitable steps were being taken at general management level and by other senior executive levels to ensure that the Group's main risks were being appropriately identified, measured and controlled.

During 2025, the Committee also received regular reports on the communications received from and sent to Group entities by domestic and foreign supervisors and the half-yearly reports of the Group's Corporate Ethics Committee; the Group's tax management was monitored on a half-yearly basis.

Functions related to auditing and sustainability reporting verification

The auditor of Banco Sabadell and its consolidated group is KPMG Auditores, S.L. (hereinafter, KPMG), which was re-appointed for 2025 at the General Meeting of Shareholders on 20 March 2025. 2025 was the sixth fifth year in which KPMG audited the Group.

During the year, the Committee liaised appropriately with the persons responsible for the group's external audit in order to receive detailed information on their strategy, planning, and work plan for the audit, of both the full-year and half-year financial statements, and with the persons responsible for verifying the sustainability reporting, to ascertain the degree of progress and main conclusions, and any issues that might jeopardise their independence.

In relation to the independence requirements set forth in the auditing regulations and the provisions of the Group's policies, the engagement of non-audit services, including the verification of the sustainability report, to be provided by KPMG to Banco Sabadell and the companies related to it by a control relationship, were submitted for approval by the Group's Audit Committee, which assessed whether the services were permissible and considered any threats and appropriate safeguards. It also received KPMG's confirmation of its independence with respect to Banco Sabadell and its Group.

The Committee issued a report expressing a favourable opinion on the independence of the external auditor, following the pertinent checks, prior to the issuance of the audit report on the financial statements for the year, providing justifications for the provision of each and every one of the services, considered individually and as a whole, other than the statutory audit and in relation to the rules governing auditor independence and the auditing regulations and on the performance of KPMG as auditor during 2025, and it proposed the re-appointment of KPMG Auditores S.L. as auditor of the company's financial statements and of the consolidated financial statements of its group for 2026, after favourably assessing compliance with the requirements of independence, objectivity, professional capacity and quality required both by law, for entities of public interest, and internally. It also reviewed that the partner in charge of the audit of the group's financial statements was being rotated properly, and assessed the suitability of the proposals made by KPMG for new persons to be responsible for the audit of the group and its subsidiaries for 2026.

The Committee was also informed of the results of other verification work carried out by KPMG or companies in its network, such as the report on the information relating to ICFR, the Sustainability Report, the annual and half-yearly Pillar III reports and the Customer Asset Protection Report.



Functions related to internal audits

The Committee assessed in detail the annual internal audit plan together with the associated budget, ensuring that the internal audit function has the resources required to perform its duties, and it decided to report favourably to the Board of Directors on both the plan and its budget.

It periodically followed up on the audits and reports issued as provided in the plan of activities, and on changes to same as a result of the dynamic risk assessment and of requests from the supervisor and senior management, among others. The Committee also held specific meetings to monitor and analyse the degree of implementation of the recommendations identified in the reports issued.

The Committee reviewed the update of the Internal Audit policies and resolved to report favourably to the Board of Directors.

The 2025 annual report on internal audit activities was presented to the Committee, detailing all the activities performed and reports issued in the year and an inventory of the recommendations and action plans set out in the various reports, as well as the outcome of the Internal Audit Quality Assurance and Improvement Programme, including the implementation of action plans deriving from internal and external assessments of the internal audit function and the attainment of the 2025 performance objectives, as well as the progress with the initiatives together with their main impact indicators from the function's Master Plan. It also approved the performance objectives for the Internal Audit function and its head for 2026.

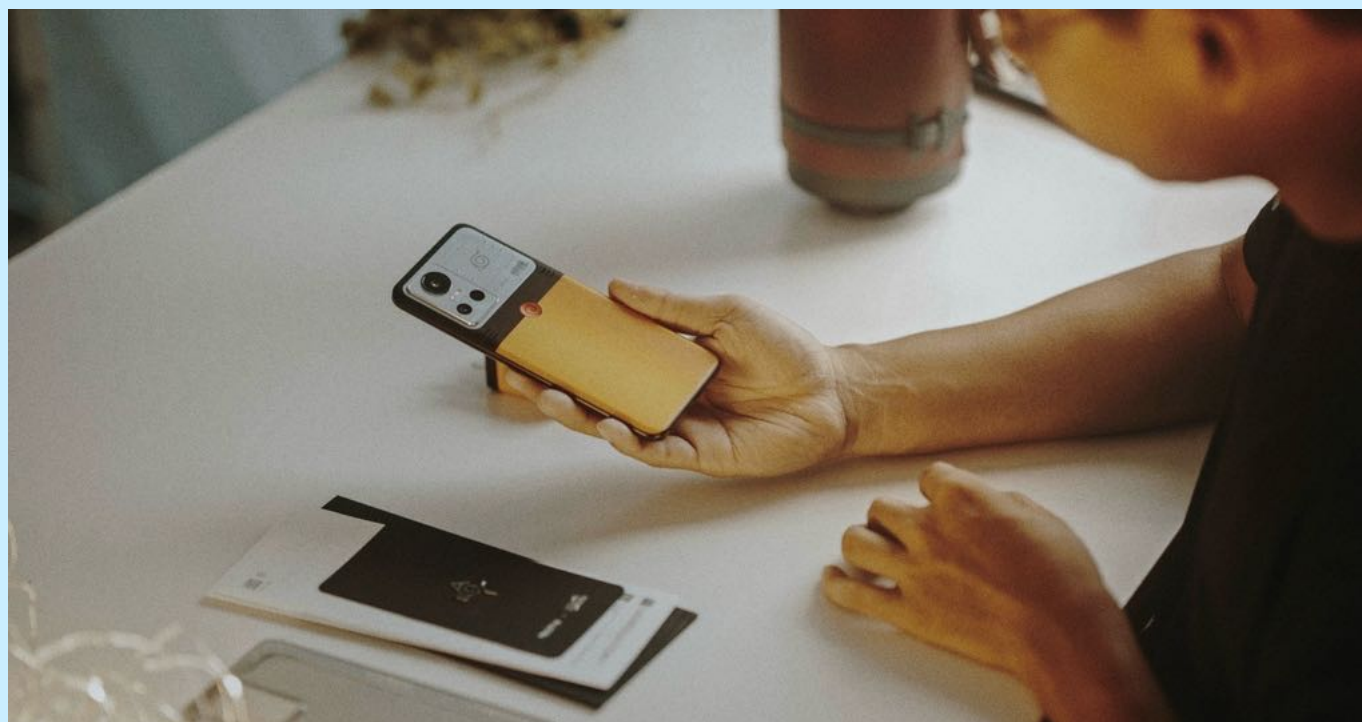
Based on the foregoing, the Committee was able to assess the adequacy and effectiveness of the internal audit function, as well as the performance of its manager, and this was reported to the Remuneration Committee and the Board of Directors for the purposes of determining their variable remuneration.

Other functions

The Committee approved and issued the mandatory reports on related-party transactions in accordance with the terms and conditions established in current regulations for their classification as related-party transactions and for requiring Board authorization. Those reports concluded that the transactions presented were fair and reasonable from the point of view of the Bank and of shareholders other than the related party, based on the fact that these transactions were carried out at the prices established by the Bank for this type of transaction and in compliance with the provisions of the Banco Sabadell Credit Risk Admission Policy and the Banco Sabadell Credit Risk Monitoring Policy. The Committee also reviewed the information on related-party transactions that was disclosed in the financial statements and authorized the report on related-party transactions in 2025.

Additionally, in January 2026, the Audit and Control Committee assessed its performance in 2025 with the assistance of an external consultant, with satisfactory results.

More information is available in the Report on the Audit and Control Committee's activities in 2025, which is available in the "Corporate Governance and Remuneration Policy/Committee Reports" section of the Banco Sabadell Group corporate website (www.grupobancsabadell.com).



Composition and meeting attendance

			Meetings
Chairman	Pedro Fontana García	Independent	16/16
Members	Aurora Catá Sala ⁽¹⁾	Independent	15/16
	Ana Colonques García-Planas ⁽²⁾	Independent	9/9
	María José García Beato	Other external	16/16
	Mireya Giné Torrens ⁽²⁾	Independent	7/7
	Pedro Viñolas Serra ⁽²⁾	Independent	9/9

80%

Independent
directors

(1) The director granted a proxy for meetings from which she was absent.

(2) Number of meetings which the directors attended with respect to the number of meetings held during the period in 2025 in which they were members.

On 28 April 2025, Ms. Mireya Giné Torrens stepped down as a member of the Appointments and Corporate Governance Committee.

On 28 April 2025, Ms. Ana Colonques García-Planas was appointed as a member of the Appointments and Corporate Governance Committee.

On 28 April 2025, Mr. Pedro Viñolas Serra was appointed as a member of the Appointments and Corporate Governance Committee.

Regulation and functioning

The Appointments and Corporate Governance Committee is regulated by article 66 of the Articles of Association and article 17 of the Board of Directors Regulation, and it has its own terms of reference that were approved by the Board of Directors on 27 May 2021 and regulate its organization and functioning.

In accordance with the Board of Directors Regulation, the Appointments and Corporate Governance Committee comprises at most five directors, appointed by the Board of Directors, none of whom may be an executive director; at least two of them must be independent directors and, in any event, the Chairman of the Committee must be appointed from among its members who are independent directors. The Secretary shall be the Secretary of the Board of Directors or, as the case may be, the Deputy Secretary of the Board of Directors.

In accordance with its terms of reference, the Appointments and Corporate Governance Committee must meet as often as necessary, and at least once every three months, when convened by its Chairman, at his/her own initiative or at the request of any member of the Committee, or whenever the Board or its Chairman requests that it issue a report or adopt a proposal, and, in any event, whenever it is advisable in order to properly discharge its duties. In any case, it must meet once per year to provide advice in advance on the Board's performance evaluation.



Functions

Without prejudice to the other duties assigned to it by law, the Articles of Association, the Board of Directors, the Board of Directors Regulation or its own terms of reference, the Appointments and Corporate Governance Committee has the following basic duties:



1. To submit to the Board of Directors proposals for the appointment of independent Directors for appointment by co-optation or for submission to the decision of the General Meeting of Shareholders, as well as proposals for the re-election or removal of such directors.
2. To report on proposals for the appointment of the remaining directors —proprietary, other external or executive³— for appointment by co-optation or for submission to the decision of the General Meeting, as well as proposals for their re-election or removal.
3. To ensure compliance with the qualitative composition of the Board of Directors, in accordance with the provisions of article 53 of the Articles of Association, assessing the balance of knowledge, capacity, diversity and experience of the Board of Directors. To this end, it must define the functions and skills required of the candidates to fill each vacancy, as well as the time commitment deemed necessary for the proper performance of their functions.
4. To ensure that, when filling new vacancies or appointing new directors, the selection procedures favour diversity of experience and knowledge, facilitate the selection of female directors and, in general, do not suffer from implicit biases that might constitute discrimination.
5. To assess the suitability, competences, knowledge and experience required of the members of the Board of Directors and their dedication with a view to³ authorization of their appointment by the competent authorities.
6. To report on proposals for the appointment and removal of senior executives and members of the Identified Staff and assess their suitability.
7. To report on the terms and conditions of the contracts of the executive directors, which must be approved by the Board and attached as an annex to the minutes.
8. To examine and organise the succession plans for the Chairperson of the Board and the Chief Executive Officer of the Bank and, where appropriate, to make proposals to the Board and, where appropriate, to comply with the provisions of the duly approved and published Succession Plan.
9. To establish a goal for representation of the under-represented sex on the Board of Directors and to develop guidance on how to achieve this goal.
10. To periodically, and at least once a year, assess the structure, size and composition of the Board of Directors and its Committees, and to advise the Board on the most appropriate configuration, reporting on proposals regarding the appointment or removal of members of such Committees.
11. To propose to the Board of Directors the assignment of Directors to the corresponding category, their continuance in this category in the event of re-appointment or their modification when appropriate; to annually review the status of Directors and to report to the Board of Directors for inclusion in the Annual Corporate Governance Report;
12. To report to the Board of Directors on proposals for the appointment of the Vice-Chairman or Vice-Chairmen, as the case may be;
13. To report to the Board of Directors on proposals relating to the appointment and termination of the Secretary and, where appropriate, the Deputy Secretary of the Board of Directors, who may or may not be directors;

14. To submit to the Board of Directors the proposal for the appointment, termination or re-election of the Lead Independent Director;
15. To develop and regularly update a competence matrix of the Board of Directors, assessing the knowledge, skills and experience of the members of the Board of Directors and of the Board of Directors as a whole, for approval by the Board of Directors;
16. To periodically review and propose to the Board the modification of policies regarding the selection and diversity of members of the Board of Directors, and to annually verify their compliance, reporting to the Board of Directors on the degree of compliance;
17. To design and organise regular refresher programmes for directors;
18. To report on the terms and conditions of senior executive contracts, without prejudice to the remuneration powers of the Remuneration Committee;

And in connection with corporate governance:

1. To report to the Board of Directors on the Company's internal corporate policies and regulations, except in matters that fall within the competence of other Committees;
2. To supervise compliance with the Company's corporate governance rules, excluding those corresponding to areas that fall within the scope of other Committees;
3. To report to the Board of Directors, for its approval and annual publication, the Annual Corporate Governance Report, except in matters that fall within the scope of other Committees;
4. To supervise, within the scope of its powers, any communications between the Company and shareholders and investors, proxy advisors and other stakeholders, and report thereon to the Board of Directors.
5. To report annually on the evaluation of the functioning of the Board of Directors, as well as the performance of its functions by the Chairperson of the Board of Directors and the Chief Executive Officer.
6. To submit to the Board of Directors the evaluations of the Board Committees with the results of their evaluation together with a proposal for an action plan or recommendations to correct any deficiencies that are detected or to improve the functioning of the Board and its Committees;
7. To propose amendments to its terms of reference and report on proposals to amend them and on proposals to amend the Regulations of the General Meeting of Shareholders of Banco Sabadell;
8. To ensure that the composition of the Board Committees, especially the Audit and Control Committee and the Risk Committee, is appropriate;
9. Any other actions that may be necessary to ensure good corporate governance in all the Company's activities.

Activities during the year

The main issues that arose in relation to the matters within the Committee's remit and the main activities carried out by the Committee in 2025 are described below:

Appointments and removals

- The Committee submitted to the Board of Directors the proposals for the appointment of Ms. Gloria Hernández García and Ms. Margarita Salvans Puigbò as Independent Directors, for approval by the General Meeting of Shareholders on 20 March 2025. In order to put forward these proposals, the Committee's priority was to seek out female candidates so as to achieve gender balance on the Board. Accordingly, with the help of external consultants, a search was launched for female candidates (persons of the under-represented sex on the Board). The Committee followed a selection process based on the professional experience and strengths of each candidate, while also seeking to match their profiles with those of the outgoing Board members, in order to maintain the collective suitability of the Board and the diversity of its profiles at all times. The Committee analysed the profiles of the candidates selected by the external consultants, assessing their overall experience, knowledge and the factors relevant to joining not only the board of a large listed company, but specifically that of a bank. This made it possible to fulfil the Committee's priorities for action, focusing on the objective of women's representation on the Board and combining this with maintaining an appropriate composition of the Board and its collective suitability.

In addition, it produced and approved the reports evaluating the suitability of Ms. María Gloria Hernández García and Ms. Margarita Salvans Puigbò.

The Committee issued a report in support of each proposal that was made available to the shareholders at the General Meeting of Shareholders, in compliance with the provisions of paragraph 4 of article 529 decies of the Capital Companies Act.

In making these appointment proposals, the Committee relied on the matrix of competencies and diversity of the members of the Board of Directors approved by the Board of Directors and analysed the needs of Banco Sabadell and the current composition of the Board of Directors to ensure an appropriate balance and diversity between the various director categories and profiles, assessing the degree to which candidates fulfil the requirements as to suitability, competencies, experience, merits and dedication for performing the functions of an independent director of Banco Sabadell.

The Ordinary General Meeting of Shareholders held on 20 March 2025 approved the proposal to appoint Ms. María Gloria Hernández García, with 99.471% of the votes representing the total share capital present and represented with voting rights.

The Ordinary General Meeting of Shareholders held on 20 March 2025 approved the proposal to appoint Ms. Margarita Salvans Puigbò, with 99.453% of the votes representing the total share capital present and represented with voting rights.

- Prior to the Board of Directors' proposal to re-elect the Chief Executive Officer, Mr. César González-Bueno Mayer Wittgenstein, the Committee approved the report confirming the assessment of Mr. César González-Bueno Mayer Wittgenstein's suitability in terms of knowledge, experience, suitability and integrity.

Once the assessment of the Chief Executive Officer's suitability had been ratified, the Committee reported favourably on the proposal for re-election by the Board of Directors to the General



Meeting of Shareholders and, to that end, issued the report preceding the proposal of the Board of Directors, which was made available to the shareholders at the General Meeting of Shareholders, in compliance with the provisions of section 6 of article 529 decies of the Capital Companies Act.

The Ordinary General Meeting of Shareholders on 20 March 2025 approved the proposal to re-appoint Mr. César González-Bueno Mayer Wittgenstein, with 99.336% of the votes representing the total share capital present and represented with voting rights.

- The Committee recommended to the Board of Directors that it submit to the General Meeting a proposal for the re-election of the Independent Director, Mr. Manuel Valls Morató, for which it had previously approved the report ratifying the assessment of the Suitability Report on knowledge, experience, suitability and integrity.

The Committee then issued the pertinent report in support of the proposal, which was made available to the shareholders at the General Meeting of Shareholders, in compliance with the provisions of section 4 of article 529 decies of the Capital Companies Act.

The Ordinary General Meeting of Shareholders held on 20 March 2025 approved the proposal to re-elect Mr. Manuel Valls Morató, with 98.984% of the votes representing the total share capital present and represented with voting rights.

- The Committee fulfilled its duty to oversee the qualitative composition of the Board and it applied the Banco Sabadell Director Selection Policy in all the foregoing proposals for the appointment and re-appointment of directors. As indicated above, the Committee based its decision on the Matrix of Competencies and Diversity of the members of the Board of Directors and carried out an analysis of Banco Sabadell's needs and the composition of the Board. The goal was to ensure an appropriate balance and diversity between the various director categories and profiles, to which end in each case it assessed the requirements as to suitability, competencies, experience, merits and dedication for performing the functions of a director of Banco Sabadell, ensuring that the various members' knowledge and skills contribute to maintaining the Board's collective suitability.
- The Committee informed the Board of Directors of the proposed appointment of Ms. Virginia Zafra de Llera, Director of Communication and Corporate Image, as a General Manager of Banco Sabadell, assessing her suitability for the position. In this context, and after approving the corresponding suitability assessment, the Committee reported favourably on the appointment, subject to obtaining the ECB's non-objection to the suitability, which was obtained on 8 October 2025.

In addition, the Committee reported favourably to the Board of Directors on the appointment of seventeen Deputy General Managers, issuing the respective reports on their suitability for assessment and approval, and concluding that the individuals evaluated were considered suitable for the performance of the proposed duties and positions.

- It reviewed the list of members of the Group's Identified Staff, and advised the Board of Directors on proposals for the appointment or removal of members, having assessed the candidates' fitness and suitability. Additionally, during the year it advised the Board of Directors on changes to the Group's Identified Staff.
- It advised the Board of Directors on proposals for the appointment or removal of senior executives of the undertakings that form part of the group and of directors of subsidiaries, affiliates and other undertakings (e.g. foundations and associations).
- The Committee informed the Board of Directors of the proposals for appointments and re-elections of members and positions on the Group's Advisory Boards, and recommended to the Board the

appointment of Mr. Iñigo Echevarría Canales as the new Chairman of the Sabadell Guipuzcoano Advisory Board, and the re-election of Mr. Rafael Fuertes Quintanilla as a member of the Eastern Regional Advisory Board.

Monitoring compliance with corporate governance rules and issues concerning the Board of Directors

It did not prove necessary to trigger the Succession Plan for the Chairman and CEO in 2025. In that connection, and in fulfilment of its duties, the Committee approved the verification report on the succession plan for the Chairman and CEO in 2024 and reported on it in the 2024 Annual Corporate Governance Report. The conclusion of that verification was that the Succession Plan for the Chairman and CEO remained valid and did not need to be updated.

Gender diversity in the Board of Directors

The target for representation of the underrepresented sex on the Board of Directors is set out in Banco Sabadell's Sustainable Commitment, a framework for action that integrates the future vision of environmental, social and governance commitments for 2025-2050 into the Bank's strategy. The target set for 2025 was achieved ahead of schedule in 2024, with women reaching 40% representation on the Board, thus exceeding the Bank's commitment set out in the Sabadell Sustainable Commitment and the provisions of Organic Law 2/2024 of 1 August on equal representation and balanced presence of women and men. At the end of 2025, when the Board comprised 14 members, that percentage stood at 43%.

In 2025, the Committee made a firm commitment to maintain the percentage of women on the Board and thereby comply with the representation targets, which it achieved by proposing the appointment of Ms. María Gloria Hernández García and Ms. Margarita Salvans Puigbò as Independent Directors.

Ratification of the appointment of the Chief Executive Officer

Following the approval of the re-election of Mr. César González-Bueno Mayer Wittgenstein as Executive Director by the General Meeting of Shareholders on 20 March 2025, the Appointments and Corporate Governance Committee reported favourably to the Board of Directors on the re-election of Mr. César González-Bueno Mayer Wittgenstein as Chief Executive Officer of Banco Sabadell, as well as the ratification of the delegation of powers from the Board to the Chief Executive Officer, which were already granted at the Board of Directors' meeting on 18 March 2021 and ratified at the Board of Directors' meeting on 26 March 2021, for registration in the Commercial Register in accordance with Article 249 of the Capital Companies Act (LSC), except for those powers that cannot be delegated by law.

Board Committee composition

- The Committee reported favourably to the Board of Directors on the ratification of the Directors re-elected by the General Meeting, Mr. César González-Bueno Mayer Wittgenstein and Mr. Manuel Valls Morató, to their positions on the Board Committees of which they were members, as well as the resignation of the Independent Directors, Ms. Laura González Molero and Ms. Alicia Reyes



Revuelta, from their positions on the Board Committees, following the effective resignation of the former and the decision of the latter not to renew her position.

- In the interests of continuously improving the functioning of the Company's corporate governance, the Committee analysed the composition of the Board Committees. As a result, the Committee submitted and recommended to the Board of Directors the following change in the composition of the Board Committees: (i) the appointment of Independent Director Ms. Mireya Giné Torrens as a member of the Credit Delegate Committee and (ii) the appointment of Independent Director Mr. Pedro Viñolas Serra and Independent Director Ms. Ana Colonques García-Planas as members of the Appointments and Corporate Governance Committee, and the removal of Independent Director Ms. Mireya Giné Torrens.

Furthermore, once the European Central Bank had given its approval for the appointments of Ms. María Gloria Hernández García and Ms. Margarita Salvans Puigbò as Independent Directors of Banco Sabadell, as mentioned above, and as a result of their incorporation into the Board of Directors, new analyses of the composition of the Committees were carried out with a view to continuously improving the functioning of the Bank's corporate governance.

The Committee submitted and reported favourably to the Board of Directors on the appointment of Independent Director Ms. María Gloria Hernández García as a member of the Audit and Control Committee and as a member of the Risk Committee. The Committee also reported favourably on the resignation of Independent Director Mr. Pedro Viñolas Serra from the Audit and Control Committee.

Subsequently, the Committee submitted and reported favourably to the Board of Directors on the appointment of the Independent Director, Ms. Margarita Salvans Puigbò, as a member of the Audit and Control Committee and as a member of the Remuneration Committee.

- It reported favourably to the Board of Directors on the composition of the Board of Directors and the categories of directors for disclosure in the 2024 Annual Corporate Governance Report, and concluded that the directors fulfilled the conditions of independence required by Order ECC 461/2013, of 20 March, on a continuous basis. The members of the Committee highlighted the high degree of compliance with the CNMV's recommendations, which improved compared to 2023. In 2024, 56 of the 64 recommendations will have been implemented (bearing in mind that eight do not apply). With the appointment of Ms. Ana Colonques García-Planas as an independent director, the percentage of female directors reached 40% in 2024. Additionally, in all proposals for the appointment or re-appointment of directors described above, it analyzed the candidates' characteristics and advised the Board on the category to which they should be assigned; no director underwent a change of category in 2025.

Matrix of competencies and diversity in the Board of Directors and Selection Policy



- The Committee reported favourably to the Board of Directors on the approval of the update to the Competency and Diversity Matrix for members of the Board of Directors, including in this update the changes corresponding to the appointments of Ms. María Gloria Hernández García and Ms. Margarita Salvans Puigbò as Independent Directors, approved by the General Meeting of Shareholders held on 20 March 2025. The competencies included in the Matrix are aligned with the competency headings referenced in the ECB's fit and proper assessment questionnaire.
- It approved the verification report on Banco Sabadell's Director Selection Policy for 2024 and reported on it in the 2024 Annual Corporate Governance Report. The verification report concluded that the proposals for appointment and re-appointment approved by the shareholders at the General Meeting complied with the requirements and parameters established by the Director Selection Policy and the requirements of the regulations governing credit institutions. Moreover, the mandatory reports of the Appointments and Corporate Governance Committee and the Board of Directors, as required by the Spanish Capital Companies Law, were properly submitted.

Furthermore, the Appointments and Corporate Governance Committee concluded that the appointments approved in 2024 and verified in the aforementioned report favoured an appropriate composition of the Board of Directors, by increasing its diversity, both in terms of the category of Directors and in terms of the knowledge, skills and experience they bring, thus complying with the mandate of the Board of Directors and the Appointments and Corporate Governance Committee itself to contribute to increasing the diversity of skills within the Board.

- It reported favourably to the Board of Directors on the annual review of the Director Selection Policy. The Committee analysed and reviewed the Director Selection Policy, making changes that merely adapt the terminology to the new regulations, without any significant substantive modifications.
- It reported favourably to the Board of Directors on the approval of the Plan for the Renewal of the Board of Directors for the financial years 2026-2029.

Director training

It reported favourably to the Board of Directors on the director training programme for 2025. Furthermore, the Committee was informed of the content and structure of the specific training programme designed for the new independent director, Ms. Margarita Salvans Puigbò, with the aim of providing an understanding of key business aspects such as the regulatory situation, risk management, retail banking, and new market trends. The director was offered this programme as part of her onboarding package.

The Committee also evaluated the Director Training Programme carried out during 2024, highlighting that all planned sessions were delivered, as well as an additional session on operational resilience that was added later. The sessions dealt with topics that are currently relevant, related to specific subjects and that help to anticipate future changes. In addition, on 5 March 2024, a visit was made to the Mobile World Congress 2024 in Barcelona, during which the major technological trends of the year and the most relevant developments from the leading technology companies were presented to the members of the Board. On 19 September 2024, the Board received training on the prevention of money laundering and terrorist financing (AML/TF) to update practical

cases and legislative developments. After considering various aspects of the training provided (diversity and relevance of the topics, quality of the speakers, level of depth and application to the Bank, among others), the Committee rated the programme as satisfactory and concluded that the standard of delivery was excellent.

Amendment of the Articles of Association and the Board Regulations

- The Committee proposed and reported favourably to the Board of Directors on the amendment of Article 2 of the Bank's Articles of Association to establish the registered office at Plaça de Sant Roc, no. 20, Sabadell.
- The Committee recommended approval and submitted to the Board of Directors a proposal to amend Articles 50 and 59 of the Bank's Articles of Association and the corresponding articles of the Regulations of the Board of Directors, having considered it appropriate to introduce incompatibility for the position of Independent Director in order to clarify the concept of permanent conflict of interest as a more precise legal construct and avoid case-by-case analysis. All of the above is without prejudice to the application of the provisions of the Capital Companies Law in relation to conflicts of interest in all other cases.

Updates to Policies and other documents

- The Committee reported favourably to the Board of Directors on the review of the new Selection Policy for Senior Management, key function holders and the rest of the Group's Identified Staff, which defines and establishes the management criteria and parameters for the selection of candidates for these positions. The Policy also establishes the principles of diversity in selection, onboarding and training once a member of senior management has been appointed and during his or her term of office.
- The Committee reported favourably to the Board of Directors on the update of Banco Sabadell's Internal Governance Policy and Internal Governance Framework, which included, with regard to the Internal Governance Policy, the corresponding update of the section on the regulatory framework to add regulatory references with which the Policy already complied without the need for adaptation, including, among others, reference to the Organic Law on equal representation and balanced presence of women and men, the Directive of the European Parliament and of the Council on improving the gender balance among directors of listed companies, as well as the update of the section on Organisational Structure, which updates the names of the People and Sustainability, and Strategy and Efficiency, and with regard to the Internal Governance Framework, the corresponding updates were made to its content as a result of changes in the shareholding structure, the Group Structure, the Bank's Organisational Structure and the update of the Policy Map.
- It also reported favourably on the review and updating of the rest of the Bank's internal corporate policies and rules within the scope of its remit. In particular, the Committee made reference to Banco Sabadell and Banco Sabadell Group's Regulatory Document Governance Policy, the Policy on Conflicts of Interest and Related Transactions in relations with Directors and Senior Management of Banco Sabadell, Banco Sabadell Group's International Mobility Policy, Banco Sabadell's Complaints and Claims Policy, the Anti-Money Laundering and Counter-Terrorist Financing Policy of Banco Sabadell and the Group, and the Communication and Contact Policy with Shareholders, Investors and Proxy Advisors of Banco Sabadell.



It also reported favourably on, and submitted to the Board of Directors, a revised Banco Sabadell Group Policy on the Internal Reporting System and Protection of Reporting Persons and a new version of the Procedure of the Internal Reporting System and Protection of Reporting Persons, in accordance with the obligations set out in Law 2/2023, regulating the protection of persons who report regulatory infringements and the fight against corruption.

- The Committee was updated on the status of the Policies and Procedures of Banco Sabadell and the Group, with the date of their most recent revision, and reported this to the Board.

Continuous assessment and other matters

- During 2025, neither the Appointments and Corporate Governance Committee nor the Board of Directors became aware of any specific circumstances that might affect the fitness and suitability of the Board of Directors or its members.

By updating the directors' suitability assessment, the Committee verified that they continue to meet the requirements of commercial and professional integrity, sufficient knowledge and experience to continue operating as members of the Board and, from that position, are in a position to contribute significantly to the governance of Banco Sabadell.

- On the occasion of the resignation of Mr. David Martínez Guzmán as a director, the Committee conducted an analysis of the composition of the Board and an assessment of its collective suitability and, as a result, it ordered that the Internal Governance Framework and the Board's Competency Matrix be updated and republished.

In connection with the collective assessment of the Board of Directors, its suitability as a body was found to have been strengthened, and likewise its collective capacity to challenge the Bank's executives and to exercise supervisory oversight. For all these reasons, it was considered that the Board of Directors as a whole maintains its fitness and suitability.

Annual Report on Corporate Governance of Listed Companies

The Committee analyzed the information to be included in the Annual Corporate Governance Report for 2024 and recommended that the Board of Directors approve it. In accordance with the provisions of Article 8.6 of Order ECC 461/2013, of 20 March, and for the purposes of preparing the Annual Corporate Governance Report, it reported favourably to the Board of Directors on the composition of the Board and the category of the Directors.

Stakeholder engagement

The Committee analysed the results and feedback received from the mid-term Corporate Governance and Sustainability roadshow in January 2025. It was also informed of a brief informative roadshow that took place after the announcement of the Extraordinary General Meetings, in which the Chief Executive Officer participated alongside Investor Relations and Corporate Governance to answer questions from proxy advisors and institutional shareholders about those Extraordinary Meetings.

Group organizational and governance structure

- The Committee reported favourably to the Board of Directors on the change in the composition of the Management Committee with the addition of the General Manager of Communication and Corporate Image as a member, following her appointment as General Manager.

- It issued a favourable report to the Board of Directors on the Group's management structure in terms of top-tier management committees, their functions and degrees of autonomy, the changes in their composition, and the amendments to their terms of reference (ToR).
- It reported favourably to the Board of Directors on the incorporation, liquidation and dissolution, capital increase and amendment of the articles of association of various Group subsidiaries.

Assessment

- It approved the Report on the performance and activities of the Appointments and Corporate Governance Committee for 2024, which was submitted to the Board of Directors and published on the corporate website sufficiently in advance of the date of the Ordinary General Meeting of Shareholders, thus complying with best practices in the field of corporate governance.
- It approved and submitted to the Board of Directors the Self-Assessment Report of the Appointments and Corporate Governance Committee for 2024. The report concluded that, with regard to the Appointments and Corporate Governance Committee, Banco Sabadell complies with all regulatory requirements and has a very high degree of compliance with recommendations and best practices in the area of corporate governance.
- It reported favourably to the Board of Directors on the Self-Assessment Report on the functioning of the Board of Directors and its Committees and the performance of their duties by the Chairman, the Chief Executive Officer, the Deputy Chairman, the Lead Independent Director and the Secretary of the Board. The report concluded that the performance of the Board and its Committees, the Chairman, Deputy Chairman, Chief Executive Officer, Lead Independent Director and Secretary of the Board of Banco de Sabadell in 2024 had been excellent.
- The Committee was informed of the review of the degree of implementation of the 2025 action priorities established in the self-assessments of the Council and its Committees, once the first half of the year had elapsed and at the end of the year. The units responsible worked on these priorities with the aim of maintaining the highest standards of corporate governance. The Committee was very satisfied with the progress made on these priorities and with the follow-up carried out.

Other functions

- The Committee reported favourably to the Board of Directors on the proposals and resolutions relating to both the 2025 Annual General Meeting of Shareholders and the two Extraordinary General Meetings of Shareholders within its remit. These include the proposal for the call and agenda, the enabling of systems and procedures for remote attendance via telematics and remote voting by any means, and the corresponding instructions and rules, the attendance card, proxy voting and remote voting templates, the notary requirement, the opening of the Shareholders' Forum and the amendment of its regulations, and the hiring of various suppliers for the evaluation and audit of the General Meeting, for electronic messaging and vote confirmation, the monitoring and certification of the availability of the documentation published on the corporate website, and for the certification of the General Meeting as a sustainable event.
- The Committee was informed of the proxy voting data, advance voting data and information on the right to information from the three Annual General Meetings held in 2025.

- In accordance with the function entrusted to the Committee, which is to prepare reports on matters within its scope of action at the request of the Board of Directors, it should be noted that its Chairman periodically presented to the Board of Directors of Banco Sabadell all the issues discussed at the Committee meetings that took place prior to the Board of Directors' meeting. This means that all matters and debates arising in the Committee are reported to the Board.
- It approved the schedule of meetings for 2026 and the Appointments and Corporate Governance Committee's Plan of activities for 2026, which sets out the mandatory issues to be discussed at the meetings proposed in the year and indicates, for each item, whether it is for information or approval, or whether a favourable report needs to be issued to the Board.

In addition to performing an assessment of its performance in 2025 with the assistance of an external consultant in February 2026, with satisfactory results, the Committee advised on the annual assessment of the performance of the Board of Directors and the other committees, the Chairman and the CEO.

More information is available in the Report on the Appointments and Corporate Governance Committee's activities in 2025, which is available in the "Corporate Governance and Remuneration Policy/Committee Reports" section of the Bank's corporate website (www.grupobancosabadell.com).

4.5. Remuneration Committee

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Composition and meeting attendance

			Meetings
Chairman	Mireya Giné Torrens	Independent	11/11
Members	Ana Colonques García-Planas	Independent	11/11
	Laura González Molero ⁽¹⁾	Independent	2/2
	Margarita Salvans Puigbò ⁽¹⁾	Independent	6/6

100%
Independent
directors

(1) Number of meetings which the directors attended with respect to the number of meetings held during the period in 2025 in which they were members.

On 20 March 2025, Ms. Laura González Molero stepped down as a member of the Remuneration Committee as a result of her resignation as a director.

On 26 June 2025, Ms. Margarita Salvans Puigbò was appointed as a member of the Remuneration Committee.

Regulation and functioning

The Remuneration Committee is regulated by article 67 of the Articles of Association and article 18 of the Board of Directors Regulation, and it has its own terms of reference approved by the Board of Directors on 27 May 2021 that regulate its organization and functioning.

In accordance with the Board of Directors Regulation, the Remuneration Committee comprises at most five directors, appointed by the Board of Directors, none of whom may be an executive director; at least two of them must be independent directors and, in any event, the Chairman of the Committee must be appointed from among its members who are independent directors. The Secretary shall be the Secretary of the Board of Directors or, as the case may be, the Deputy Secretary of the Board of Directors. The Regulation of the Remuneration Committee establishes that the Committee must meet as often as necessary, and at least once every three months, when convened by its Chairman, at his/her own initiative or at the request of any member of the Committee, or whenever the Board or its Chairman requests that it issue a report or adopt a proposal, and, in any event, whenever it is advisable in order to properly discharge its duties. In any event, the Committee must meet once per year to prepare the information on director remuneration that the Board of Directors must approve and include in its annual public disclosures.

Functions

Without prejudice to the other duties assigned to it by law, the Articles of Association, the Board of Directors, the Board of Directors Regulation or its own terms of reference, the Remuneration Committee has the following basic duties:

1. To propose to the Board of Directors, for submission to the General Meeting of Shareholders, the remuneration policy for Directors, and to submit the pertinent report, all in accordance with the terms established from time to time in the applicable regulations.
2. To determine the remuneration of non-executive directors, in accordance with the provisions of the director remuneration policy, submitting the corresponding proposals to the Board.

Rem
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3. To determine, so that they may be contractually agreed, the extent and amount of individual remuneration, rights and compensation of a financial nature, as well as the other contractual conditions of executive directors, in accordance with the director remuneration policy, submitting the corresponding proposals to the Board of Directors.
4. To propose to the Board of Directors the remuneration policy for General Managers or those who perform senior management functions under the direct supervision of the Board, the Management Committee or Managing Directors.
5. To report on share-based and/or option-based remuneration programmes.
6. To periodically review the general principles of remuneration as well as the remuneration programmes of all employees, assessing their compliance with these principles.
7. To annually review the remuneration policy to ensure that it is aligned with the Bank's short-, medium- and long-term strategy and situation and market conditions and to assess whether it contributes to long-term value creation and adequate risk control and management. Likewise, to advise the Board of Directors on the Annual Report on Directors' Remuneration;
8. To ensure that the Bank's remuneration policy and practices are up to date, proposing any necessary changes, and that they are subject to a central independent internal review at least once a year.
9. To verify that the remuneration policy is properly applied and that no payments are made to directors that are not provided for in the policy.
10. To evaluate the mechanisms and systems in place to ensure that the remuneration system takes due account of all types of risks, liquidity and capital levels and that the remuneration policy promotes and is consistent with sound and effective risk management, and that it is in line with the business strategy, objectives, corporate culture and values and the long-term interests of the Bank.
11. To review the various possible scenarios to analyze how remuneration policies and practices react to internal and external events, and consider retrospective evidence of the criteria used to determine remuneration and the *ex-ante* adjustment to risk based on actual risk outcomes.
12. To review the terms and conditions of the contracts of executive directors and senior management and to report to the Board of Directors, as appropriate, and verify that they are consistent with the current remuneration policy;
13. To evaluate the degree of compliance with the criteria and objectives established in relation to the previous year, which is what must determine the proposal for the individual remuneration for directors, particularly executive directors, senior management and members of the Identified Staff, including the short-, medium- and long-term variable components, with the participation of the external advisor where appropriate.
14. To propose to the Board of Directors the determination of the remuneration accrued by the Directors and Senior Management.
15. To propose to the Board of Directors the determination of the bonus for the senior management of the Bank and its subsidiaries.
16. To verify whether the circumstances justifying the application of malus and clawback clauses to variable remuneration have arisen, and propose the appropriate measures to recover any amounts that may apply.
17. To approve the appointment of external remuneration consultants that the Committee may decide to engage for advice or support.
18. To ensure that conflicts of interest do not impair the independence of external advice.
19. To ensure transparency of remuneration.

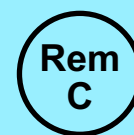
20. To verify the remuneration information contained in the various corporate documents, including the annual and half-yearly financial reports, the Annual Directors' Remuneration Report, the Annual Corporate Governance Report and the Statement of Non-Financial Information.
21. To review that the information that the Bank disseminates on its website on matters within the competence of the Committee on directors and members of senior management is sufficient and appropriate and follows the applicable Good Corporate Governance recommendations.

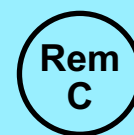
Activities during the year

The main issues that arose in relation to the matters within the Committee's remit and the main activities carried out by the Committee in 2025 are described below:

Fixed and variable remuneration

- It reported favourably to the Board of Directors on the proposed remuneration of the Chairman and the members of the Board of Directors and its Committees for 2025. In particular, the 2025 remuneration proposal for executive directors (CEO and Chief Risk Officer) and senior management. It also approved the 2025 remuneration proposal for the Internal Audit Director and the members of the Group's Identified Staff and subsidiaries' Boards of Directors.
- The Committee proposed and issued a favourable report to the Board of Directors on the approval of individual objectives for the Chief Executive Officer and Chief Risk Officer for 2025. It also approved the sets of objectives for the members of the Management Committee and their measurement scales. It also approved the report of the People Division on the 2025 individual objectives for the members of the Group's Identified Staff, concluding that their objectives are adequately aligned with the guidelines for defining them that were approved by the Remuneration Committee in January. The Remuneration Committee also received a report from the Risk Committee on the coherence of these objectives with the level of risk appetite.
- It reported favourably to the Board of Directors on the Group's proposed annual 2025 and multi-year 2025-2026 targets and their scales of achievement for 2025. It also approved the guidelines for setting objectives.
- It reported favourably to the Board of Directors on the assessment of fulfilment of the Group's annual targets for 2024 and of the multi-year targets for 2022-2024 once the period for measuring the targets had concluded.
- It reported favourably to the Board of Directors on the assessment of fulfilment of the 2024 individual objectives for the Chief Executive Officer and Chief Risk Officer and for the members of Senior Management, and it approved the assessment of fulfilment of the 2024 individual objectives for the Internal Audit Director and the percentages of attainment of the 2024 objectives for the rest of the members of the Group's Identified Staff.
- It reported favourably to the Board of Directors on approval of the proposed payment of 2024 variable remuneration to the CEO, CRO and members of Senior Management.
- It approved the proposal for the payment of 2024 variable remuneration to the Internal Audit Director and members of the Group's Identified Staff.



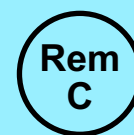


- It was informed of the Report by the Risk Regulation and Control Division (CRO) on ex ante risk adjustment of the 2024 variable remuneration. The report also took into account the contributions made by the People and Sustainability, Finance, Internal Audit and Compliance areas. Based on that report, the Committee reported favourably to the Board of Directors on the non-application of ex ante risk adjustments to the 2024 variable remuneration in addition to those already prescribed in the 2024 target-setting mechanism. The Committee determined that no ex post adjustments (malus and clawback clauses) were applicable to the variable remuneration deferred from previous years for the Group's Identified Staff.
- The Committee reported favourably to the Board of Directors on the General Terms and Conditions of Banco Sabadell's Long-Term Remuneration 2025-2027 for the Identified Group of Banco Sabadell, as well as that, in relation to Long-Term Remuneration 2023-2025 and 2024-2026, in the event of a change of control, the incentive would be determined by applying the same criteria as those established in the General Terms and Conditions of Long-Term Remuneration 2025-2027. It approved the payment of the 2024 variable remuneration for all Group employees and the application of the 2025 salary management budget.
- It approved the budget and the salary management model.
- The Committee reported favourably to the Board of Directors on the remuneration in 2025 for the Advisory Boards of the Banco Sabadell Group.
- It advised the Board to adopt, for submission to the General Meeting of Shareholders, the cap on variable remuneration for members of the Group's Identified Staff.
- It approved the Group's Variable Remuneration Fund for 2025 and analysed its variation in stressed scenarios.
- It approved the revision of the peer group of European banks and Spanish companies that Banco Sabadell uses for the annual benchmarking exercise in connection with the remuneration for executive directors and members of senior management, as well as for calculating one of the multi-year indicators for the long-term remuneration of the Identified Staff (relative shareholder return - relative TSR) and reported favourably to the Board of Directors on the adjustment of the scale of attainment for the long-term TSR objective 2023-2025.
- It approved attainment of the 2024 objectives, payment of variable and the 2025 salary review for the members of the local Identified Staff at Sabadell UK Branch.
- The Committee was informed of the key indicators used to monitor Banco Sabadell's workforce, including indicators related to voluntary turnover, as well as the implementation of specific measures to anticipate and mitigate the risk of talent leaving.
- The Committee made a positive recommendation to the Board of Directors on the proposed bonus of 300 shares for each serving employee as recognition of their hard work as a group.

Sabadell Sustainable Commitment - Diversity and Remuneration

Within the framework of the Sustainability Report, it analysed the evolution of the main diversity and remuneration indicators. With regard to diversity on Banco Sabadell's Board of Directors, women represent 40% of the total Board, thereby complying in advance with the deadlines set out in Organic Law 2/2024 on equal representation and balanced presence of women and men. In relation to diversity at Banco Sabadell, in December 2024, 56.4% of employees were women, representing a diverse and balanced workforce. With regard to remuneration, the

measures implemented in recent years have been effective and have resulted in a gradual reduction in the pay gap. . In this regard, all factors contributing to reducing the pay gap and its trends were analysed, including the action plan, modelling work and detailed analysis by level, considering the trend and ongoing improvement, and also a comparison with the industry.



Group's Identified Staff

- It issued a favourable report to the Board of Directors on the identification of the Group's Identified Staff for 2025, by application of Commission Delegated Regulation (EU) 2021/923.
- It reported favourably to the Board of Directors on the proposals for additions to, and removals from, the Identified Staff at the Group, the overseas branch in the UK, and TSB and subsidiaries.
- It approved the contractual conditions and/or amendments to remuneration in connection with the Group's Identified Staff.
- The Committee approved the contractual conditions, amendments to same, and/or removal of members of the Group's Identified Staff.
- The Committee made a positive recommendation to the Board of Directors on the proposed remuneration and contractual terms for the appointed General Manager of Communication and Corporate Image and her appointment to the Bank's Senior Management and Management Committee.

Policies

It reviewed and reported favourably to the Board of Directors on Banco Sabadell's remuneration policies, comprising the Banco Sabadell Group Remuneration Policy, the Senior Management Remuneration Policy, the Group Identified Staff Remuneration Policy and the Banco de Sabadell, S.A. Remuneration Policy, and reviewed the policies of Mexico and subsidiaries.

Annual Report on Corporate Governance of Listed Companies

It vetted and cleared the information on remuneration and the information on the Remuneration Committee (composition, meeting attendance, regulation and working, and functions and activities in 2024) to be included in the Annual Corporate Governance Report, and recommended that the Board of Directors approve the content relating to Board of Directors remuneration.

Annual Report on the Remuneration of Directors of Listed Companies

It issued a favourable report to the Board of Directors on the contents of the Annual Report on Director Remuneration and proposed that the 2024 Report be submitted to a consultative vote as a separate item on the agenda at the General Meeting of Shareholders, as provided in current legislation.

Consolidated Non-Financial Disclosures and Sustainability Disclosures of Banco Sabadell and its subsidiaries (Sustainability Report)

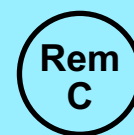
The Committee was informed about the content relating to diversity and remuneration in Banco de Sabadell, S.A.'s 2024 Sustainability Report. Given that the transposition of the Corporate Sustainability Reporting Directive (CSRD) did not ultimately come into effect, this report was prepared in accordance with Law 11/2018, complying with the provisions of the Law. Voluntarily, sustainability content was reported in accordance with the CSRD and, therefore, in line with European standards.

Assessment of remuneration policy and its effective application

- On 28 January 2025, it examined the report by external consulting firm Mercer on the Assessment of the Remuneration Policy applicable to the Identified Staff of the Banco Sabadell Group and the Director Remuneration Policy that were in force in 2024, which was commissioned in order to establish the degree to which they conformed to the current prudential requirements in connection with remuneration. The report concluded with a very positive assessment of all the points analyzed and of the content of the Remuneration Policies, which comply and are aligned with the prudential requirements in force in connection with remuneration.
- The Committee examined on 28 January 2025 the reports issued by the consultancy firm Spencer Stuart and KPMG on analysis of the competitiveness of the remuneration of the Chairman for his non-executive functions and the 2023 Board meetings.
- On 28 January 2025, the Committee examined the reports issued by the consultancy firm Willis Towers Watson concerning analysis of the competitiveness of senior management remuneration.
- On 28 January 2025, it analysed the annual Internal Audit Report on the Remuneration Policy of the Group and Subsidiaries, whose main objective was to review the degree to which the organization's remuneration policies (Group and subsidiaries) conform to the guidelines of the EBA and applicable regulations.

TSB

- The Committee was informed of the main issues presented to the TSB Remuneration Committee.
- It approved the 2024 objectives for TSB's CEO.
- It approved the contractual conditions and/or removal of members of the TSB Executive Committee.
- It approved changes to the 2025 remuneration scheme for TSB senior staff.
- It approved the Personnel Report on the setting of individual targets for 2025 for members of the Group's Identified Staff (TSB employees).
- It approved the terms and conditions of remuneration for members of the Group's Identified Staff (TSB employees).
- It reported favourably to the Board of Directors on the amendment to the contractual relationship with TSB's independent directors to include a period of notice of termination of their duties.
- It approved a bonus to ensure stability and retention of key talent at TSB.
- It approved the payment of a special bonus to TSB employees for their contribution to Banco Sabadell's challenge (Sabadell Thank you).



Mexico

- The Committee was informed of the main issues presented to the Remuneration Committee in Mexico.
- It reported favourably to the Board of Directors of Banco Sabadell, S.A., IBM on the review of its remuneration policy.

Other subsidiaries

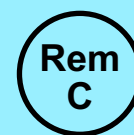
- It reviewed and reported favourably to the subsidiaries' boards of directors on the composition of the local Identified Staff of Sabadell Consumer Finance, S.A.U. and Urquijo Gestión, S.A.U. SGIIC, as well as the 2024 variable remuneration and the salary review for both companies and long-term remuneration at Sabadell Consumer Finance, S.A.U.
- It verified and issued a favourable report to the subsidiaries' boards of directors in connection with the changes applicable to local remuneration policies of Sabadell Consumer Finance, S.A.U. and Urquijo Gestión, S.A.U. SGIIC.
- It approved the remuneration of the members of Boards of Directors of subsidiaries for 2025.
- It informed the Board of Directors of Sabadell Consumer Finance, S.A.U. that the 2024 objectives for its Identified Staff had been attained.
- It informed the Board of Directors of Urquijo Gestión, S.A.U. SGIIC. that the 2024 objectives for its Identified Staff had been attained.
- It reported favourably to the Board of Sabadell Consumer Finance, S.A.U. on the general terms and conditions of the 2025-2027 long-term variable remuneration for the identified group at Sabadell Consumer Finance.
- It approved the amendments of the contracts for executives who are members of Identified Staff at the subsidiary Sabadell Consumer Finance, S.A.U.

External consultants

The Committee approved the engagement of external remuneration consultants for 2026 to prepare the mandatory report on the 2025 remuneration policy assessment and remuneration benchmarking reports. In addition, they are to provide advice and support to the Committee on regulatory matters, review the Annual Report on Director Remuneration and conduct an audit of the Remuneration Equality Plan.

Assessment

- It approved the Report on the performance and activities of the Remuneration Committee for 2024, which was submitted to the Board of Directors and published on the corporate website sufficiently in advance of the date of the Ordinary General Meeting of Shareholders, thus complying with best practices in the field of corporate governance.
- The Committee approved and submitted to the Board of Directors its self-assessment report on the Remuneration Committee for 2024. The report noted Committee members' appreciation of performance in all areas analysed: agility of debates; willingness of members to exercise good governance; and dialogue between directors and the Bank's senior management. For more details on the action plan and evaluation of the Committee, see the sections entitled "Plan of Action 2025" and "Annual evaluation of the performance of the Remuneration Committee".



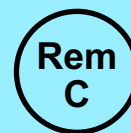
Other functions

- It approved the schedule of Committee meetings for 2026.
- It approved the Remuneration Committee's Activity Plan for 2026.

Additionally, in January 2026, the Remuneration Committee assessed its performance in 2025 with the assistance of an external consultant, with satisfactory results.

During 2025, in accordance with the priority set by the Committee in its 2025 action plan, it was informed about key indicators related to Banco Sabadell staff, including voluntary turnover, as well as the implementation of specific measures to anticipate and mitigate the risk of losing talent.

More information is available in the Report on the Committee's activities in 2025, which is available in the "Corporate Governance and Remuneration Policy/ Committee Reports" section of the Banco Sabadell Group corporate website (www.grupobancsabadell.com).



4.6. Risk Committee

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Composition and meeting attendance

			Meetings
Chairman	George Donald Johnston III ⁽¹⁾	Independent	14/16
Members	Aurora Catá Sala ⁽¹⁾	Independent	14/16
	María Gloria Hernández García ⁽²⁾	Independent	8/8
	Alicia Reyes Revuelta ^{(1) (2)}	Independent	3/4
	Manuel Valls Morató	Independent	16/16

100%
Independent
directors

(1) The directors granted a proxy for the meetings from which they were absent, with one exception.

(2) Number of meetings which the directors attended with respect to the number of meetings held during the period in 2025 in which they were members.

On 20 March 2025, Ms. Alicia Reyes Revuelta stepped down as a member of the Risk Committee as a result of her decision not to seek re-appointment as a director.

On 29 May 2025, Ms. María Gloria Hernández García was appointed as a member of the Risk Committee.

Regulation and functioning

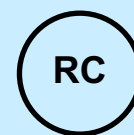
The Risk Committee is regulated by article 68 of the Articles of Association and article 19 of the Board of Directors Regulation, and it has its own terms of reference approved by the Board of Directors on 27 May 2021 that regulate its organisation and functioning.

In accordance with the Board of Directors Regulation, the Risk Committee comprises at most five directors, appointed by the Board of Directors, none of whom may be an executive director; they must have the appropriate knowledge, skill and experience to fully understand and oversee the Bank's risk strategy and risk appetite; at least two of them must be independent directors; in any event, the Chairman of the Committee must be appointed from among its members who are independent directors. The Secretary shall be the Secretary of the Board of Directors or, as the case may be, the Deputy Secretary of the Board of Directors. In the exercise of its functions, the Risk Committee may directly request the information it sees fit from both the Chief Risk Officer and from the departments that report to him/her, including notably the Internal Control Division, the Credit Risk Control Division, the Validation Division and the Compliance Division; in accordance with its Regulations, the Committee meets as often as necessary and at least once every two months, when convened by its Chairman, at his/her own initiative or at the request of any member of the Committee, or whenever the Board of Directors or its Chairman requests the issuance of a report or the adoption of proposals and, in any case, whenever appropriate for performing its functions.

Functions

Its functions are focused on supervising and exercising oversight to ensure that all the risks of the Bank and its consolidated Group are accepted, controlled and managed appropriately, and reporting to the full Board on the performance of the functions corresponding to it, in accordance with the law, the Articles of Association, the Board of





Directors Regulation and its own terms of reference. The main functions of the Risk Committee are as follows:

1. To supervise the implementation of the Global Risk Policy.
2. To report quarterly to the full Board on the levels of risk assumed, the investments made and the evolution thereof, as well as on the repercussions that may arise for the Group's revenue from variations in interest rates and their compliance with the VAR approved by the Board itself.
3. To follow up and detect if any of the approved thresholds is exceeded, and to ensure the activation of action plans established for this purpose.
4. To report to the Remuneration Committee on whether employee remuneration programmes are consistent with the Bank's risk, capital and liquidity levels.
5. To advise and support the Board of Directors on the monitoring of the Bank's risk appetite and overall risk strategy, taking into account all types of risks, to ensure that they are in line with the Bank's business strategy, objectives, corporate culture and values.
6. To assist the Board of Directors in monitoring the implementation of the Bank's risk strategy and the corresponding limits set.
7. To monitor the implementation of the Bank's capital and liquidity management strategies, as well as all other material risks, to assess their alignment with the approved strategy and risk appetite.
8. To recommend to the Board of Directors any adjustments to the risk strategy deemed necessary as a result of, inter alia, changes in the Bank's business model, market developments or recommendations made by the risk control function.
9. To advise on the appointment of external consultants in the field of the Bank's supervisory activity.
10. To analyze a range of possible scenarios, including stress scenarios, to assess how the Bank's risk profile would react to external and internal events.
11. To monitor consistency between all major financial products and services offered to customers and the Bank's business model and risk strategy. The Risk Committee shall assess the risks associated with the financial products and services offered and shall take into account the consistency between the prices assigned to such products and services and the profits obtained.
12. To assess the recommendations of the internal or external auditors and to verify the proper implementation of the measures taken.
13. To coordinate with the Audit and Control Committee in relation to the latter's functions relating to supervising and assessing the effectiveness of the internal control and risk management policies and systems as a whole, covering financial and non-financial risks relating to the Institution, including operational, technology, legal, social, environmental, political, reputational and corruption-related risks, and to ensure that the main direct or indirect risks are reasonably identified, measured and controlled, and to discuss with the auditor any significant weaknesses in the internal control system detected during the course of the audit. To this end, meetings may be held with senior managers of the Bank's business units so that they may discuss business trends and associated risks and, where appropriate, to submit recommendations or proposals to the Board of Directors and the corresponding timeframe for their follow-up.
14. To report to the full Board on the performance of its functions, in accordance with this article and other provisions of the law, the Articles of Association and regulations that are applicable to it.

Activities during the year

The main issues that arose in relation to the matters within the Committee's remit and the main activities carried out by the Committee in 2025 are described below:

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Global Risk Framework and Risk Appetite Statement

One of the main functions of the Risk Committee is to propose the Risk Appetite Statement (RAS) to the Board of Directors for approval, both for the Group and for the various geographies, in accordance with the established governance.

During 2025, it reported favourably to the Board of Directors on the annual review of the Group's Global Risk Framework Policy, which determines the common ground for risk management and control, and of the Risk Appetite Framework (RAF) Policy, which establishes the structure and mechanisms associated with the governance, definition, disclosure, management, measurement, monitoring and control of the Group's Risk Appetite and coordination of same with the subsidiaries.

Additionally, in accordance with the provisions of the Global Risk Framework Policy, in 2025 the Risk Committee reported favourably to the Board of Directors on the update of the Group's risk profile and the Group's inventory of material risks.

In 2025, the Risk Appetite Statement (RAS) was updated several times to ensure that it is complete and complies with regulatory requirements and market best practices.

The RAS was strengthened during the year through the inclusion of new metrics:

- i. Compliance risk.
- ii. Asset quality risk.
- iii. Concentration risk.
- iv. Conduct risk.

Risk management and control policies

The Group's risk governance provides for the risk policy framework to be reviewed regularly and in the event of significant changes.

In this context, as part of the development of the Global Risk Framework, the Risk Committee also analyzed and subsequently reported favourably to the Board of Directors, and submitted for its approval, the update of the policies on risk control, which lay the groundwork for the Risk Control Function, in order to offer a 360-degree view of all risks, and ensure compliance with the risk strategy, as well as the update to the policies for managing and controlling risk, such as: credit, solvency, operational, technology, IRRBB and CSRBB, liquidity, market, foreign exchange, model, reputational, conduct and compliance risks, among others, which explicitly set out the basic principles and procedures that must govern the management and control of all the Group's material risks and incorporate the requirements established by regulation.

In line with Group policy governance, the Risk Committee reported favourably to the Board of Directors on the approval of the new Banco Sabadell Group's Fraud Management Policy.

Regular monitoring of the Risk Appetite Statement

The Risk Committee monitored all the Group's material risks broadly on a regular basis.

To this end, the Risk Committee analyzes and discusses the fundamental aspects and the status of the material metrics in the Risk

Appetite Statement, as well as the evolution of the loan book's domestic and international exposure.

The Risk Committee's reporting consists of:

- a) Regularly reviewing a scorecard that reflects trends in the main metrics and additional information on material risks in accordance with the current risk taxonomy, and ensuring that they conform to the established risk appetite.
- b) Monographic risk analyses, which are detailed in the following section.
- c) Reporting and proposing adaptation plans (protocol triggering, changes in guidelines, etc.) derived from the analysis of risk evolution.

In addition, a monthly CRO Note is submitted to the Risk Committee, providing input from the head of 2LoD to facilitate discussions and focus attention on those matters that are considered most critical or on which additional insight is sought from the Committee members. This note is made available to the Board of Directors to supplement the information received.

Other regular monitoring tasks

Additionally, as part of the risk monitoring function entrusted to the Risk Committee, it also regularly:

- a) Monitored how ICO-guaranteed transactions are managed and, on a temporary basis, reported on the actions taken by the Bank as a result of the flash floods in Valencia.
- b) Monitored the risk profile of the new loan portfolio.
- c) Monitored minimum prices and the RaRoC of new production.
- d) Monitored the material exposures reviewed previously by the Credit Delegated Committee.
- e) Monitoring of asset *quality trends*, plans to reduce exposure to NPAs and recovery activity, as well as 2LoD monitoring of trends in non-performing assets (NPAs), including a comparison with the main peers in terms of staging and provisions, as well as the assessment of the effectiveness of internal control over the refinancing process.
- f) Monitored leveraged transactions.
- g) Tracked the execution of action plans arising from on-site and off-site inspections and targeted reviews conducted by the supervisory authority.
- h) Performed quarterly tracking of resolution planning.
- i) Performed quarterly monitoring of the ICAAP outcome and economic capital.
- j) Monitored structural risks: liquidity, IRRBB and CSRBB.
- k) Performed quarterly monitoring of 2LoD for the main risks and issues at TSB

The Risk Committee also approved the Annual Activity Plan for the Risk Control function.

The Risk Committee was informed about the various types of risks through specific monographic analyses (deep dives). The deep dives provide detailed information on the main aspects related to the evolution of risk, changes in the economic and regulatory environment that directly affect the Bank, their potential impact on the Bank, the management and control framework in place to mitigate risk and the monitoring carried out through the RAS.

Specifically, monographs and reports were presented in 2025 on the following subjects:

Operational Risk; Fraud Risk; Conduct Risk; Market Risk; Country Risk; Technology Risk; Financial Institution Risk; Counterparty Risk; and

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Structural Balance Sheet Risk (IRRBB, CSRBB, and liquidity and currency risk).

Performance in 2025 was shaped by macroeconomic, geopolitical, environmental and industry events, including notably:

- a) With regard to the **macroeconomic environment**, economic growth remained robust in both Spain and the US during 2025, although the US labour market is showing clear signs of weakness, while growth in the Mexican economy is sluggish. Growth by the Spanish economy was led by domestic demand, with strong household consumption spending. The European Central Bank continued the trend of interest rate reductions that commenced in 2024 in a context in which inflation remained around its target. Nevertheless, it maintained a cautious tone in view of the high level of uncertainty surrounding worldwide.
- b) The main **geopolitical** events of the year were marked by uncertainty over trade policies, following the rollout of the Trump Administration's agenda, including a package of global tariffs on *Liberation Day* in early April; the tariffs were increased faster and more aggressively than expected, to levels not seen since the 1930s. This, together with fears about the deterioration of institutional quality in the United States, led to moments when the role of US government bonds as a safe-haven asset and the dollar as an international reserve currency was called into question, causing spikes of volatility in financial markets. The state of public finances continued to be a concern, not only in the United States, but also in countries such as France.

As a result, during the year a range of assessments and analyses of the potential impacts on the Bank of all such risks were submitted to the Risk Committee. Specifically:

- a) In January 2025, an analysis of the main risks to the macroeconomic and financial environment for 2025 was submitted to the Risk Committee for information.
- b) As a result of the trade policies implemented by the Trump Administration and following "*Liberation Day*", two analysis reports were submitted to the Risk Committee for information in April. The first addressed the implications for the dollar's performance, assessing potential scenarios of financial instability and their impact on the bank's position, with particular attention to the USD funding gap. The second report, entitled "Credit risk actions due to uncertainty in international trade", focused on monitoring the risks associated with uncertainty in international trade, detailing the preparatory actions that had been taken, which consisted of identifying the portfolio that might be affected and initiating reviews of customers on a case-by-case basis. Subsequently, an update to this second report was presented in July, incorporating the performance of those measures and their potential impact on the bank's loan book.
- c) In June, following the US attacks on Iran, an analysis of the potential macroeconomic impact of the attacks was submitted to the Risk Committee for information purposes.
- d) Following orders issued by FINCEN (*Financial Crimes Enforcement Network*) prohibiting financial institutions in the United States from processing transfers linked to three banks based in Mexico, the Mexican authorities imposed sanctions on those banks and Visa disconnected all international transactions made with cards issued by one of the sanctioned banks from its network. As a result, an assessment of the potential impact on the Group arising from direct and indirect exposure to the aforementioned sanctioned banks was submitted to the Risk Committee for information in July.

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Risk models

The Banco Sabadell Group has extensive experience in the use of internal models for supporting its decision-making process. In recent years, the Group has stepped up efforts to control and supervise the risks involved in their use.

The Risk Committee approved the Validation function's Annual Activity Plan for 2025 and was briefed on the 2024 activity report.

In 2025, the Risk Committee was informed of the annual monograph on the use of AI-based models, as well as strengthening governance of those models.

With regard to the IRB credit risk models used in calculating regulatory capital requirements, the Risk Committee and the Board of Directors were informed of the material change in the LGD models for private individuals and acquired undertakings, and in the rating and PD models for property companies and developers, resulting from the resolution of remediation plans established by the Supervisor. It was also informed of a material change in TSB secured models.

With regard to annual monitoring of IRB models, the Risk Committee was informed of the performance of the models for private individuals and companies.

The Risk Committee was informed of developments in connection with provisioning models for credit risk.

Regarding credit risk management models, the Committee was informed of the annual monitoring of the PRISMA tool and admission methodologies for businesses and companies.

In connection with the ICAAP, the Risk Committee reported favourably to the Board of Directors on the internal models for calculating economic capital for all prominent risks identified in the Risk Assessment, taking into account the criteria of proportionality and complexity established in the ECB's guidance on ICAAP, as well as on the LGD models used in calculating provisions for the financial planning and ICAAP process.

In connection with IRRBB models, the Risk Committee was informed of the loan prepayment model. It was also informed of the monitoring and updating of the model for deposits without a fixed maturity.

Reports on strategy and financial planning, the Internal Capital Adequacy Assessment Process (ICAAP) and Internal Liquidity Adequacy Assessment Process (ILAAP), and the Recovery Plan

In 2025, the Risk Committee reviewed:

- Macroeconomic and financial scenarios are among the key elements for the Group's various strategic corporate processes, and its governing bodies participate in the process of approving them. Consequently, in September, the Risk Committee reported favourably to the Board of Directors on the approval of the macroeconomic and financial scenarios.
- Processes for assessing the Group's capital adequacy and liquidity position. In particular, the Committee reviewed in detail the contents of the ICAAP reports for 2024, following the Committee members' challenge of the contents and the ensuing debate, and taking into account the opinion of Validation regarding the internal models used for calculating economic capital. It also considered whether the approach applied in producing the ICAAP reports allows for full and consistent measurement of risks among the different quantifications based on the vulnerabilities inherent to the business model, the

Ri



efficient allocation of capital by business unit considering all risks, the continuous holistic process of identifying vulnerabilities, and the complete and continuous measurement of capital needs. The Committee also assessed the contents of the concise statement to be signed by the directors in connection with the ICAAP.

The Committee assessed the contents of the Internal Liquidity Adequacy Assessment Process (ILAAP) regarding the outcome of identifying and assessing the materiality of liquidity risks, the preliminary assessment of climate risk, the Liquidity Contingency Plan, the result of the Stress Test exercises and the result of the ILAAP 2024 and the Working Priorities established for 2025, as well as the concise statement to be made by the Board of Directors, together with the 2LoD reports. These Risk Control and Validation reports from 2LoD support the pertinent qualitative and quantitative reviews in order to verify that the internal processes and the methodologies and assumptions used provide sound results and remain appropriate for both the current situation and potential future developments.

- Analysis of risks associated with the 2025-2029 financial projections, as well as their update following the proposed sale of *subsidiary TSB*.
- The *Recovery Plan*.

In this process, the Committee was supported by the Finance Division and the Internal Control Division, providing assurance that the reports faithfully reflect the Group's situation in the areas analyzed.

In 2025, the bank drew up a new Strategic Plan covering the period 2025-2027, and the Risk Committee was informed, through a 2LoD opinion, of the proper identification of risks and mitigants associated with that plan.

The Committee was informed of the annual update of the Recovery Plan, as well as of the main improvements, focused on the evolution of the proposed stress scenarios.

Throughout the year, the Risk Committee was informed of the progress with the 2025 stress test conducted by the EBA.

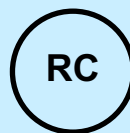
Other business

The Risk Committee reviewed various aspects of technology and data quality risk in 2025, including most notably:

- i. the risks associated with the project to upgrade and migrate TSB's mainframe to more modern data centres.
- ii. The final implementation of all the initiatives deployed at the bank to adapt to the DORA regulations that come into force in January 2026. Additionally, to strengthen governance over the main aspects of this directive, the Risk Committee now receives a regular report on digital operational resilience.
- iii. The main operational and technology impacts for the bank resulting from the sale of TSB, as well as potential risks that were identified and planned preventive measures.
- iv. In April, the conclusions reached by 2LoD as a result of the independent assessment of BCBS 239 were presented to the Risk Committee. An update on this opinion was submitted to the Risk Committee in December.

In the area of sustainability, new environmental risk metrics and indicators linked to credit risk were added, while the monitoring of decarbonization pathways in new portfolios continued and was reported regularly to the Risk Committee.

Throughout 2025, the Risk Committee received a series of 2LoD reports on trends in the credit risk control framework, with a particular



focus on (i) the individual analysis of significant borrowers, and (ii) the re-appraisal process. It was also informed about the status of certain credit portfolios and their management and control framework, such as shipping, digital infrastructure and the government loan book.

The Risk Committee was also informed of the various reports by the SSM and other regulators (Bank of Spain, CNMV, etc.) in their ordinary or specific supervisory actions, as well as the SREP 2025 evaluation.

In connection with compliance, the Risk Committee approved the Annual Activity Plan for the Compliance function and regularly monitored its implementation. In this regard, the Risk Committee was informed of the assessment of the Group's new supervisory model for subsidiaries and overseas branches.

In addition, the Risk Committee was informed of and discussed the key aspects of the MiFID Compliance Report and submitted it to the Board of Directors for information purposes.

The annual Expert Report on the Prevention of Money Laundering and Terrorist Financing was also presented to the Risk Committee.

It was also informed of the annual report by the Customer Care Service (SAC), as well as the report on the processing of personal data (General Data Protection Regulation), and the data protection risk report.

The Risk Committee also reported favourably to the Remuneration Committee on the suitability of the composition of the Identified Staff and of the degree to which their objectives align with the Bank's risk profile and capital and liquidity levels.

The Risk Committee reviewed and approved its Activities Plan for 2025, which set out the mandatory issues to be discussed at the meetings proposed during the year, stating the required purpose in connection with each issue.

It approved the schedule of Risk Committee meetings for 2026.

Additionally, in January 2026, the Risk Committee, assessed its performance in 2025 with the assistance of an external consultant, with satisfactory results.

More information is available in the Report on the Committee's activities in 2025, which is available in the "Corporate Governance and Remuneration Policy/ Committee Reports" section of the Banco Sabadell Group corporate website (www.grupobancsabadell.com).



5. Related-party transactions and intercompany transactions (D) (D.1, D.2, D.3, D.4, D.5, D.6 and D.7)

5.1. Procedure for the approval of related-party and intercompany transactions, and the bodies empowered for this purpose (D.1, D.2, D.3, D.4, D.5 and D.7)

Law 5/2021, of 12 April, amending the consolidated text of the Capital Companies Law, approved by Legislative Royal Decree 1/2010, of 2 July, and other financial regulations, with regard to the promotion of long-term shareholder involvement in listed companies, introduced Chapter VII bis, Related-party Transactions, into the Capital Companies Law. Banco Sabadell is a listed company, so this system of rules applies to directors and shareholders involved in related-party transactions.

Competent bodies

Under that regulation, related-party transactions whose amount or value is 10% or more of the total value of the assets per the company's last approved balance sheet require approval from the General Meeting of Shareholders. The Board of Directors has the power to approve any other related-party transaction, and this power may not be delegated.

The Audit and Control Committee must issue a report on any related-party transaction before it is approved by the General Meeting of Shareholders or the Board of Directors. The Committee's report must assess whether the transaction is fair and reasonable from the standpoint of the company and, if applicable, of the shareholders other than the related party, and it must set out the assumptions on which the assessment is based and the methods used.

The Capital Companies Law, at Article 529 duovicies.2, prohibits a director who is conflicted by a related-party transaction or who represents a conflicted shareholder from taking part in deliberation and voting on related decisions under Article 228.c) of the Law.

This duty is set out in Banco Sabadell's Policy on Conflicts of Interest and Related-Party Transactions in connection with Directors and Senior Management, which prescribes that a director or member of senior management must refrain from attending or taking part in deliberation or votes concerning any matter in which he or she is conflicted by a related-party transaction. The duty to refrain extends to meetings of the Board or of any other company body, committee or department concerned with the transaction or related decision-making. Moreover, a conflicted director or senior manager may not access confidential information touching on the related-party transaction.

Banco Sabadell records in the minutes of the meetings of the Board or of any other body of which the conflicted director is a member that he/she withdrew from the meeting while the matter in which the director is conflicted by a related-party transaction was being dealt with.

In addition, pursuant to Article 529.duovicies.1 of the Capital Companies Law, when the General Meeting of Shareholders is called upon to decide on a related-party transaction, a conflicted shareholder is deprived of the right to vote, except where the proposed resolution was

approved by the Board without a majority of independent directors voting against. No such event arose.

In 2023, an additional function was assigned to the Credit Delegated Committee in accordance with Banco Sabadell's Policy on Conflicts of Interest and Related-Party Transactions in connection with Directors and Senior Management. The Policy prescribes that when a transaction within the Committee's remit (credit, refinancing or restructuring, sale of foreclosed assets, etc.) might qualify as a related-party transaction, the Committee must be informed by means of a reasoned report by the Compliance Division (without prejudice to its powers to approve credit transactions on the basis of their amount). The Committee must always be informed if the value of a credit transaction exceeds €1,000,000 and a director of Banco Sabadell, or a related party of theirs, sits on the board of the borrower.

In these cases, if, in accordance with the criteria established by international accounting standards, especially IAS 24, as referred to in Article 529 vicies of the Capital Companies Law, the Compliance Division considers that it does not constitute a related-party transaction, it must submit a report to the Committee setting out the reasons for this conclusion. The Credit Delegated Committee must review the information, and reach a conclusion as to whether or not the transaction qualifies as a related-party transaction, in which case it must report the transaction to the Audit and Control Committee for assessment and subsequent submission to the Board.

In addition, the Credit Delegated Committee must be provided with the same information on related-party transactions that the Compliance Division submits each year to the Audit and Control Committee.

Delegation of powers to approve related-party transactions

In accordance with the aforementioned regulations, the Board of Directors may delegate the approval of related-party transactions that meet the following conditions:

- (i) transactions between companies in the same group that are carried out in the ordinary course of business and at arm's-length, and
- (ii) transactions arranged on the basis of contracts with standardised terms and conditions that are applicable en masse to a large number of customers, carried out at prices or rates that are set on a broad basis by the supplier of the good or service, where the amount does not exceed 0.5% of the company's net turnover.

Pursuant to the provisions of the Capital Companies Law, the Board of Directors of Banco Sabadell resolved to empower the Bank's Compliance Division to review whether transactions with related parties should be considered as related-party transactions for the purposes of the Capital Companies Law and, if so, to approve them if they meet the aforementioned conditions.

The approval of such transactions by the Compliance Division by delegation from the Board does not require a prior report from the Audit and Control Committee.

Internal reporting and control procedure

The internal procedure for regular reporting and oversight of related-party transactions that are approved using powers delegated by the Board was adopted by the latter at its meeting of 1 July 2021. The procedure is as follows:

On an annual basis, the Compliance Division must report to the Audit and Control Committee on the outcome of the reviews of related-party transactions for the purpose of verifying the fairness and transparency of such transactions and, if applicable, compliance with the applicable regulations for them to be approved by the Compliance Division by delegation, providing the following details:

- Number of transactions reviewed.
- Related-party transactions approved by the Compliance Division in exercise of the delegation of the Board of Directors.
- Related-party transactions escalated to the Board of Directors for approval.
- Other information to support the aforementioned verification and compliance checks.

Coupled with the above procedure, the Compliance Division has its own review procedure to determine whether or not a transaction qualifies as a related-party transaction for the purposes of the Capital Companies Law.

Intercompany transactions

Intercompany transactions are subject to the same approval procedures as customer transactions, requiring at least the approval of the Group Risk Transactions Committee and at most the approval of the Board of Directors.

Transactions in 2025

There were no transactions that were material because of their size or nature between the Bank or any Group undertaking and the Bank's significant shareholders.

There were no material transactions with directors and executives of the Bank other than those classified as "related-party transactions" under Article 529 *vicies* of the Capital Companies Law that were conducted with the appropriate approvals and, where appropriate, disclosed in accordance with Article 529 *unvicies et seq.* of the Capital Companies Law. Those that did take place were performed in the normal course of the Bank's business or on an arm's-length basis or on terms generally available to any employee. There is no record of any transactions being performed other than on an arm's-length basis with persons or entities related to directors or senior managers.

The balances of transactions with related parties are disclosed in note 40 to the Group's consolidated financial statements and in note 36 to the separate financial statements.

The Bank is not controlled by any other entity, listed or otherwise, in the meaning of article 42 of the Commercial Code.



5.2. Mechanisms established for detecting, determining and resolving possible conflicts of interest between the company and/or its group, and its directors, executives or significant shareholders (D.6)

Banco Sabadell has the following mechanisms in place to detect, determine and resolve any conflicts of interest between the Bank and/or its Group, and its directors, executives or significant shareholders.

1. The Banco Sabadell Group General Policy on Conflicts of Interest and the Banco Sabadell General Policy on Conflicts of Interest are internal rules approved by the Board of Directors of Banco Sabadell and they are reviewed once per year. These policies are intended to be effective in identifying, assessing, managing, mitigating, preventing or ultimately disclosing potential or actual conflicts of interest. The Compliance Division is responsible for correctly applying those policies and, when necessary, it will urge the other departments in the Group to which they apply to take the necessary action.
2. The Policy on Conflicts of Interest and related party transactions in connection with Directors and Senior Management, approved by the Board of Directors on 24 March 2022 and last revised on 21 March 2024, establishes the necessary measures for managing conflicts of interest of directors and senior management and their related parties in connection with corporate transactions or non-bank activities and also with ordinary banking business.

The Group's Risk Transactions Committee analyzes all credit operations carried out by directors, senior management and their related parties and makes proposals to the Board of Directors for their approval.

Royal Decree 84/2005, implementing Law 10/2014, of 26 June, on the Regulation, Supervision and Solvency of Credit Institutions, sets out the requirements in connection with disclosure of transactions by directors, senior executives and their related parties to the competent authority and for authorization by the latter.

3. In 2021, the Board of Directors approved an extensively revised and updated version of the Group's Code of Conduct in order to bring it into line with regulatory requirements, supervisory guidelines and reports, and market standards. The Code contains a catalogue of principles, obligations and duties that are binding upon all members of the Group. It also defines the criteria to be followed to ensure ethical and responsible conduct, both in relationships within the Group itself and in relationships with customers, suppliers, shareholders, investors and other stakeholders. All members of the Group were required to expressly adopt the Group's Code of Conduct.
4. The Banco Sabadell Group's Internal Rules of Conduct in connection with the securities markets (IRC), approved by the Board of Directors on 24 May 2018 and updated in September 2021, are applicable to the members of the Bank's Board of Directors, and to all executives and employees whose work is directly or indirectly related to the Institution's activities and services in the field of the securities markets or who have frequent or habitual access to insider information related to the Bank itself or Group companies.

Section 4 of the IRC sets out the mechanisms for identifying, preventing and resolving possible conflicts of interest that are detected by persons bound by the IRC, who are obliged to declare

any significant relations of a financial, family or other nature with customers of the Bank in connection with services related to the securities markets or to companies listed on the stock exchange, as well as any other relationships that, in the opinion of an external neutral observer, might compromise the impartiality of the persons concerned.

5. Banco Sabadell Group's Corporate Ethics Committee is responsible for fostering ethical conduct throughout the organization and for giving advice to the Board of Directors, via the Audit and Control Committee, and advising the corporate and business units on decisions involving issues that might lead to conflicts of interest.

The Committee is also responsible for overseeing the Group's compliance with its obligations as set out in the Code of Conduct and in the Internal Rules of Conduct in connection with the securities market.

To achieve its objectives, the Corporate Ethics Committee can call upon the resources of the Compliance Division, and has been given extensive powers by the Board to gain access to all the documents and information it requires to perform its supervisory function.

6. Under the Board of Directors Regulation, all Board members are bound by a duty of loyalty and confidentiality and are required to disclose any interest they may have in the company itself or in other companies outside the Group.

Specifically, Article 29 of the Regulation states that a director may not provide professional services to Spanish companies whose corporate purpose coincides wholly or partly with that of the company. An exception is made for offices they hold in companies in the Group. Directors must notify the Appointments and Corporate Governance Committee before accepting any executive appointment in another company or institution.

Article 31 of the Board of Directors Regulation states that directors must inform the company of any company shares which they own directly or through companies in which they hold a significant stake.

They must also disclose any shares held, directly or indirectly, by their close relatives. Directors must also inform the company of all positions that they hold and activities that they perform in other companies or entities and, generally, of any fact or situation that may be material in connection with their performance as directors of the company.

7. The Capital Companies Law establishes that directors have a duty to avoid conflicts of interest, and it lists the situations in which a director must abstain from acting and, in any case, establishes the duty to notify the other directors and, where appropriate, the Board of Directors of any situation where their interests, or those of their related parties, may be in conflict, directly or indirectly, with the interests of the company.



6. Risk control and management systems (E)

6.1. Scope of the Bank's Risk Control and Management System, including that relating to tax risks (E.1)

To manage and control risk, the Banco Sabadell Group has defined a Global Risk Framework whose purpose is to establish the basic common principles relating to the Group's risk management and control activity, including all actions associated with the identification, decision-making, measurement, evaluation, monitoring and control of the risks to which the Group is exposed. These activities include the functions performed by the overall Group's areas and business units.

With the Global Risk Framework, the group seeks to:

- Address risk through a structured approach that is consistent Group-wide.
- Encourage an open, transparent risk management and control culture by promoting the involvement of the entire organization.
- Facilitate decision-making.
- Align risk acceptance with the risk strategy and risk appetite.
- Understand the risk environment in which it operates.
- Ensure that, in accordance with the Board's guidelines, critical risks are identified, understood, managed and controlled in an efficient manner.

The Global Risk Framework is applied to all the Group's business lines and entities on a proportionate basis, having regard to their size, the complexity of their activities and the materiality of the risks assumed.

To ensure that risk management and control are effective, the Group's Global Risk Framework must comply with the following principles:

- Risk Governance and involvement of the Board of Directors through the three lines of defence model.
- Alignment of the Group's business strategy with the risk appetite set by the Board of Directors.
- Integration of the risk culture, focusing on aligning remuneration to the risk profile.
- Holistic vision of risk that translates into the definition of the taxonomy of first- and second-tier risks on the basis of their nature.
- Alignment with stakeholder interests.

The Global Risk Framework is composed of the following elements:

- Global Risk Framework Policy.
- Risk Appetite Framework (RAF).
- *Risk Appetite Statement* (RAS).
- Specific policies for the material risks to which the Group (i.e. Banco Sabadell and its subsidiaries) is exposed.

The Global Risk Framework Policy provides a general framework for establishing other policies related to risk management and control by determining common aspects that apply to the various risk management and control policies.

The Group promotes a risk culture composed of a set of values, beliefs, knowledge and attitudes related to risk that is shared by all

members of the organization and helps to manage and control risks efficiently while avoiding undesired behaviour.

The Board of Directors of Banco Sabadell has approved the Group's tax strategy. That strategy is governed by the principles of efficiency, prudence, transparency and minimization of tax risk, and it is broadly aligned with the Banco Sabadell Group's business strategy.

6.2. Bodies of the Bank responsible for drawing up and executing the risk control and management system, including tax risk (E.2)

The functions of Banco Sabadell's Board of Directors include identifying the Group's main risks and implementing and monitoring the appropriate internal control and information systems, including challenges and tracking and strategic planning of the Group and oversight of management of the material risks and their alignment with the profile defined by the Group.

To this end, it participates directly (or through the Bank's Risk Committee) in monitoring the risk strategy, including the definition of risk appetite, RAF, RAS and policies; monitoring the implementation of the risk culture throughout the organization, and in reviewing the adequacy of the organizational structure to that strategy.

The Board of Directors is the body responsible for establishing the general guidelines on the organizational distribution of the risk management and control functions and for determining the main lines of strategy in this respect, ensuring their consistency with the Group's short- and long-term strategic objectives, as well as with the business plan, capital and liquidity planning, risk capacity, and remuneration programmes and policies.

The Board of Directors has indelegable responsibility for: (i) determining the tax strategy; (ii) approving investments or operations considered strategic by virtue of their amount or special characteristics, strategic nature or particular tax risks, unless their approval corresponds to the General Meeting; (iii) approving the creation of special-purpose vehicles or entities resident in jurisdictions designated as tax havens, and the acquisition of shares in such undertakings; and (iv) the approval of any other transactions or operations of a comparable nature whose complexity might impair the transparency of Banco Sabadell and its Group.

Additionally, the Credit Delegated Committee, the Risk Committee, the Remuneration Committee and the Audit and Control Committee are involved in the Group's Global Risk Framework and, therefore, in risk management and control. Moreover, a number of Committees and Divisions have a significant involvement in the risk management.

Specifically, the following committees have been created and have risk control and management functions within the Global Risk Appetite Framework:

- Technical Risk Committee (CTR), the body entrusted with supervising risk management and control in the Bank, meets on a monthly basis and has the following functions:
 - (i) supporting the Risk Committee in fulfilling its functions (which include determining, proposing, reviewing and tracking the body of regulations relating to risk, the Risk Appetite Statement and the frameworks associated with each portfolio and/or risk; supervising the institution's risk on an overall level; and tracking the tolerance thresholds of first- and second-tier metrics in the RAS on the basis of established governance, and any adaptation plans);

(ii) monitoring, examining and, if appropriate, expressing approval in relation to matters within the remit of the Committee (approve RAS metrics in accordance with established governance rules; propose to the Risk Committee, for subsequent submission to the Board for approval, any material change in internal models as defined in the Banco Sabadell Model Risk Management and Control Policy, in accordance with its governance; approve asset allocation, based on the policies and metrics set out in the various credit risk frameworks);

(iii) tracking management of doubtful assets and foreclosed assets that together make up the Non-Performing Assets (NPAs), and reporting on this to the Risk Committee;

(iv) analysing ad-hoc issues in specific portfolios or risk classes, for referral and inclusion in risk management.

- Group Risk Transactions Committee: a management body responsible for overseeing the quality of the Group's credit risk and developing the credit risk acceptance policy for approval by the Board of Directors; it meets on a weekly basis and has the following functions:

(i) approval of credit transactions, including transactions/limits for countries and banks, and of specific criteria in line with the policies under the established delegation of powers;

(ii) delegating powers to lower echelons (autonomies) in accordance with the established delegation of powers, monitoring their use, and referring proposals for changes to the Credit Delegated Committee; and

(iii) monthly reporting to the Credit Delegated Committee of the transactions approved and performed in the previous month.

- NPA Monitoring and Management Committee (CSyGAP): a management body responsible for coordinating the recovery cycle, including avoiding and containing default by promoting forward-looking strategies; it meets once per month and has the following functions:

(i) monitoring the performance of the Bank's loan book, on a sub-portfolio basis, with a focus on anticipation, identifying returns by sector/sub-portfolio, and setting limits in sectors/sub-portfolios with greater emerging risk;

(ii) establishing management priorities to be communicated to the business units based on the portfolios/sectors/exposures to be focused on at any given time in order to anticipate potential default and a potential classification as non-performing, including monitoring and management of significant emerging risks with a potential impact on the credit portfolio;

(iii) ensuring coordination between the Risk Division and the business units to reduce the potential for default and delinquency;

(iv) monitoring the portfolio of non-performing assets and the recovery strategy for those assets; and

(v) establishing frameworks, tools and/or algorithms to facilitate decision-making for both monitoring sub-portfolios and managing non-performing assets.

- Assets and Liabilities Committee (ALCO): a management body responsible for optimising and monitoring the management of structural risk in the Banco Sabadell Group's balance sheet, particularly its ALCO portfolio, in accordance with guidelines, objectives and policies defined by the Bank's Board of Directors; it meets every month and has the following functions:

(i) approving and tracking macroeconomic and financial scenarios generated by the Group's Studies Division. Additionally, it must be informed regularly of economic, financial, political and



geopolitical events and, generally, of other external factors capable of influencing the Group's structural risks;

(ii) approving and tracking management of the structural risks in the balance sheet by the Balance Sheet Management unit at Banco Sabadell Spain and the Group, including liquidity risk, Interest Rate Risk in the Banking Book (IRRBB), Credit Spread Risk in the Banking Book (CSRBB) and currency risk;

(iii) delegating monitoring of market risk to the Investment and Liquidity Committee (CIL), and receiving regular reports on this issue;

(iv) optimizing the balance sheet structure vis-à-vis those structural risks in accordance with the guidelines, goals and policies defined by the Board of Directors;

(v) approving risk-adjusted pricing strategies taking account of transfer pricing (FTP) and other transaction costing. As a critical parameter of IRRBB and liquidity risk, approving, at least once per quarter, the liquidity premiums (LTP) that, together with the base rates (ITP), lead to the transfer prices for commercial asset and liability transactions;

(vi) monitoring and defining management guidelines in relation to the structural liquidity position, securities issues, interest rate risk, the ALCO portfolio, transfer prices and the structural currency position;

(vii) functions related to corporate structural risks (Group) and local risks at Banco Sabadell Management Unit (UGB BS) level:

- Centralised coordination and supervision of the corporate management function (corporate function)
- Monitoring of financial activity by the Group and UGB BS, with a breakdown of margins, business evolution, product performance, etc.
- Tracking hedges arranged at UGB BS level to manage IRRBB.

(viii) activating and, as appropriate, closing down the Liquidity Contingency Plan, with the possibility of delegating management of a liquidity crisis situation to the Investment and Liquidity Committee (CIL).

- Internal Control Body (OCI): a management body responsible for implementing the policies and procedures established in the Law on the prevention of money laundering and terrorist finance; it meets once per quarter and has the following functions:

(i) deciding whether to notify the Spanish government's anti-money laundering agency (SEPBLAC) of transactions or events likely to be related to money laundering or terrorist financing;

(ii) deciding on reporting to the Commission for the Surveillance of Terrorist Financing Activities of full information related to any event or transaction that is suspected or known to be related to the financing of terrorism.

(iii) approving files arising from alerts raised by employees which, after analysis by the Money Laundering and Terrorist Finance Prevention Division (DPBCFT), it is decided not to notify to SEPBLAC;

(iv) approving proposals for responses to requests by SEPBLAC for information about customers and/or transactions;

(v) deciding on whether to maintain or terminate business relationships with customers that are analyzed, on the basis of the established procedure;

(vi) authorising or denying:

- Proposals to establish business relationships with resident financial institutions classified as having high (above-average) risk.

- The establishment and/or maintenance of business relationships with politically exposed persons or their related parties.
 - The establishment and/or maintenance of business relationships with Spanish-resident customers, whether Spanish nationals and/or those who were born in countries that present strategic deficiencies in their systems for combating money laundering and terrorist financing and are listed in the European Commission's decision adopted in accordance with the provisions of Article 9 of EU Directive 2015/849;
 - (vii) authorising or denying:
 - Exception requests from customers in connection with alerts about unusual transactions.
 - Exception requests from customers operating in countries with certain international restrictions.
 - Exception requests from customers with transactions that require prior authorization.
 - Proposals for corporate transactions in accordance with the Group's Anti-Money Laundering Manual 4815;
 - (viii) approving the annual training plan on the prevention of money laundering and terrorist financing;
 - (ix) approving updates to the internal regulation manuals on the prevention of money laundering and terrorist financing of the Bank and the domestic Group companies that are subject to the Law;
 - (x) designating the members of the delegated committee of the internal control body (OCI) to perform the functions delegated to them with respect to any decision that cannot wait until the OCI's next scheduled meeting; any actions they take must be reported to the next meeting;
 - (xi) approving special analysis files arising from court orders, and on the cancellation, maintenance or restriction of business relations with the analyzed customers;
 - (xii) approving reports regarding material information on possible breaches of the law on the prevention of money laundering and terrorist financing that have been communicated by the Bank's employees, executives or agents, including anonymous reports;
 - (xiii) approving the PMLTF Risk Assessment Report (Self-assessment Report) of the group and of Banco de Sabadell, S.A.
- Corporate Ethics Committee (CEC): this committee reports directly to the Board of Directors, which is the highest body with responsibility for adopting policies in connection with the corporate reputation and ethics. Its main mission is to promote ethical behaviour throughout the organization to ensure compliance with the principles of conduct set out in the Code of Conduct, the Internal Rules of Conduct in connection with the Securities Market (RIC), the Criminal Liability Prevention Policy, the General Policy on Conflicts of Interest and the Anti-Corruption Policy of the Banco Sabadell Group. To this end, the CEC has the following functions:
- (i) proposing amendments to keep the Group's Code of Conduct up to date at all times;
 - (ii) making proposals to the Bank's Board of Directors with regard to any measures required to promote ethical behaviour throughout the organization;
 - (iii) advising the Board of Directors and the Group's corporate and business units on decisions involving aspects that may result in conflicts of values and/or interest, and any matters related to its mission;
 - (iv) monitoring compliance with the provisions of the Group's Code of Conduct and the codes of conduct governing employees and external suppliers of goods and services:

(v) responding to queries, concerns and conflicts that may arise in relation to compliance with the provisions of the Code of Conduct while ensuring confidentiality where appropriate and guaranteeing the absence of reprisals in this connection;

(vi) warning parties involved in potential breaches through the People Division, when the parties are Group employees, or through the Secretary of the Board of Directors of Banco Sabadell, when the parties are members of the Board of Directors;

(vii) fulfilling the functions assigned to it by the Internal Code of Conduct in connection with the Securities Market (RIC);

(viii) monitoring the working, fulfilment and execution of the Group's Crime Risk and Anti-Corruption Organization and Management Model in accordance with the Criminal Liability Prevention Policy.

The Chief Compliance Officer (CCO) is responsible for the design, monitoring and continuous improvement of the Crime Risk and Anti-Corruption Organization and Management Model in accordance with the provisions of the Criminal Liability Prevention Policy.

The CCO will report to the CEC on the performance of the Crime Risk and Anti-Corruption Organization and Management Model, and on any noteworthy incident or aspect in this area, and the CCO or the CEC may escalate suspicious events or conduct or matters connected with the crime compliance targets and, therefore, with the Criminal Liability Prevention Policy and the Crime Risk and Anti-Corruption Organization and Management Model to the Audit and Control Committee and, if necessary, to the Board of Directors through the Committee or directly via the CRO;

(ix) supervising all cases of market abuse and reporting them to the CNMV;

(x) reviewing, by delegation from the Board of Directors, the reporting by the Compliance Division on the opinions issued with respect to the review of transactions conducted by Banco Sabadell or its subsidiaries with related parties, in accordance with the internal procedure for disclosure and regular oversight established by the Board of Directors.

The CEC is also responsible for ensuring compliance with the Banco Sabadell Group Policy on the Internal Reporting System and Protection of Reporting Persons and the related Procedure, and for acting as head of the Group's Internal Reporting System (except with respect to the Group's subsidiaries in Mexico and the United Kingdom), appointing the CCO as Secretary of the CEC, and managing and supervising its operation, and protecting good-faith whistleblowers under the terms of the Policy and the Procedure.

- UK Steering Committee: a management body responsible for providing a business overview of TSB Banking Group plc and TSB Bank plc and their subsidiaries and reviewing proposals to be presented to TSB's governing bodies that require validation by the Group. It performs its functions in accordance with the TSB-Banco Sabadell relationship framework and its Terms of Reference.

6.3. Main risks (E.3)

The Group has established a taxonomy of risks that includes the risks to which it is exposed in the performance of its activities. Specifically, it identifies the following first-tier and second-tier risks:

6.3.1. Strategy risk

Risk of losses (or negative impacts in general) as a result of the adoption or subsequent implementation of strategic decisions. It also includes the inability of the Group's business model to adapt to changes in the environment in which it operates. This risk includes:

- Solvency risk: the risk of not having sufficient capital, in terms of quality or quantity, to achieve the strategic and business objectives, withstand operating losses or fulfil regulatory requirements and/or the expectations of the market where it operates.
- Business risk: the possibility of incurring losses as a result of adverse events with a negative impact on the capacity, strength and recurrence of the income statement, whether its viability (short term) or its sustainability (medium term).
- Reputational risk: the risk, present or future, that the Bank's ability to compete may be negatively affected by: i) acts or omissions made by or attributed to the Group, senior management or its governing bodies; or ii) for maintaining business relationships with counterparties with a questionable reputation such as to create a negative perception on the part of its stakeholders (regulators, employees, customers, shareholders, investors and society in general).
- Environmental risk: the risk of loss arising from present and potential future impacts of environmental risk factors on counterparties or invested assets, and on aspects affecting financial institutions as legal persons. Environmental factors are related to the quality and functioning of natural systems and environments, and include factors such as climate change and environmental degradation. All of them can positively or negatively impact the financial performance or solvency of an entity, sovereign state or individual. Those factors may be mainly physical (deriving from climate change and environmental degradation, including an increased frequency of extreme weather events and gradual changes in climate patterns and in ecosystem equilibria) and transitional (resulting from the process of adjustment towards an environmentally-stable economy: lower emissions, higher energy efficiency, and lower consumption of natural resources, inter alia).

6.3.2. Credit risk

The possibility that losses may be incurred as a result of borrowers failing to meet their obligations or through losses in value due simply to deterioration in borrower quality. This risk includes:

- Borrower default risk: the risk that borrowers fail to honour their payment obligations in a timely manner; it also includes the risk of fraud in applications for credit and the risk of dilution arising, for example, from a business dispute.
- Concentration risk: the level of exposure to a group of economic groups which, due to their importance, might generate significant credit losses in the event of an adverse economic situation. This concentration may arise at the level of a single customer or economic group, or at an industry level.

- Counterparty risk: a type of credit risk that arises where, in a transaction involving derivatives or repos with deferred settlement or on margin, the counterparty defaults before the final settlement of the transaction cash flows.
- Country risk: the risk arising in the debts of a country, taken as a whole, as a result of reasons inherent to the country's sovereignty and economic situation, i.e. for circumstances other than regular credit risk. It manifests itself in a debtor's potential inability to honour their foreign currency payment obligations to external creditors due, among other reasons, to the country preventing access to foreign currency, the inability to transfer it, or the non-enforceability of legal action against borrowers for reasons of sovereignty, war, expropriation or nationalization. Country risk affects not only debts contracted with a State or entities guaranteed by it but also all private debtors that belong to such State and who, for reasons outside their control and not at their volition, find themselves generally unable to honour debts.
- Non-performing asset (NPA) risk: the risk of incurring higher costs or losses associated with managing doubtful and/or foreclosed assets.
- Equity risk: the risk of incurring losses or of an impairment of the Group's solvency as a result of adverse movements in market prices, losses on sales or the insolvency of medium and long-term investments made through capital instruments. It refers basically to the Group's portfolio of equity holdings (listed and unlisted), including the portfolio of associates over which it exerts significant influence.



6.3.3. Finance risk

The possibility of obtaining insufficient returns or having insufficient liquidity such as to prevent compliance with requirements and future expectations. This risk includes:

- Liquidity risk: the possibility of incurring losses as a result of the Bank being unable, albeit temporarily, to honour payment commitments due to a lack of liquid assets, or of it being unable to access the markets to obtain finance at a reasonable price. Accordingly, liquidity risk is inherent to the Bank's funding structure and market conditions.
- Exchange rate risk: the possibility of incurring losses on net positions in currencies other than the functional currency arising from investments in the equity of subsidiaries or in the endowment funds of foreign branches.
- Interest Rate Risk in the Banking Book (IRRBB): the interest rate risk on positions that are not part of the trading book (IRRBB), i.e. the potential current or future losses to an entity's equity or revenue as a result of adverse fluctuations in interest rates.
- Market risk: arising from the possibility of loss in the market value of financial asset positions due to variations in risk factors with an impact on their market prices or volatility or the correlation between them. This refers in particular to trading positions.
- Credit Spread Risk in the Banking Book (CSRBB): risk of loss in the equity and P&L accounts of an entity driven by changes in the market price of credit risk, liquidity and potentially other characteristics of credit-risky instruments, which is not captured by another existing prudential framework such as IRRBB or by expected credit/(jump-to-) default risk. CSRBB captures the risk of an instrument's changing spread while *prima facie* disregarding idiosyncratic events and assuming the same level of creditworthiness, i.e., how the credit spread moves within a certain rating / PD range.

6.3.4. Operational risk

Operational risk is defined as the risk of losses resulting from failures or inadequacies in processes, people and internal systems or from external events. This definition includes, but is not limited to, compliance risk, model risk and information and communication technology (ICT) risk, but does not include strategy risk or reputational risk. This risk includes:

- Fraud risk: the possibility, present or future, of losses arising from actions, by employees or by third parties, with the intent to defraud, misappropriate, or evade regulations, laws or company policies.
- Conduct risk: broadly speaking, the possibility, current or future, of losses arising from the inadequate provision of financial services or any other activity carried out by the Institution, due to improper conduct vis-à-vis customers (current or potential), employees (respect for human rights, equality, well-being, inclusion, or workplace safety and hygiene), shareholders and suppliers, markets, political parties or society in general, including cases of wilful or negligent conduct.
- Process risk: the possibility of incurring losses due to failures in process management, execution or delivery or to inadequate processes.
- Technology risk (ICT risk): the risk, present or future, of losses due to inadequacy or failures in the hardware and software of technical infrastructures that may compromise the availability, integrity, accessibility, confidentiality or traceability of infrastructure,

applications and data, or the impossibility of changing technology platforms in a reasonable time scale and at a reasonable cost in the face of changes in the needs of the environment or the business. Also included are security risks resulting from inadequacy or failures in internal processes or external events, including cyber attacks and inadequate physical security at data processing centres.

- Outsourcing risk: the risk, present or future, of losses arising from the use of a third party's resources and/or media to perform, on a normalised stable, permanent basis, certain processes of the outsourcing company, which inherently entails exposure to a series of underlying risks, such as operational risk, including conduct risk, information and communication technology (ICT) risk, reputational risk, concentration risk and lock-in risk.
- Talent/management risk: the risk of incurring losses due to events arising from the Group's relations with employees, associated, for example, with the non-availability of suitable profiles, staff rotation and replacement, employee dissatisfaction, etc.
- Model risk: the risk, present or future, to an institution as a result of decisions based primarily on the results of internal models, due to errors in the design, application or use of those models.
- Data aggregation risk: the risk associated with inappropriate processing and/or consideration of data within the entity that might affect the accuracy, preparation, dissemination and, where appropriate, publication of relevant reporting used in decision making, including, but not limited to, data risk and regulatory and financial reporting risk.
- Compliance risk: the risk of incurring legal or administrative sanctions, significant monetary losses or an impairment of reputation due to breach of laws, regulations, internal rules, or codes of conduct applicable to the banking industry.
- Tax risk: the probability of failing to comply with the objectives set out in the Group's tax strategy from a dual perspective due to either internal or external factors:
 - (i) Firstly, the probability of failing to comply with tax obligations that may result in a failure to pay taxes that are due or the occurrence of any other event that impairs attainment of the Bank's goals.
 - (ii) Secondly, the probability of paying taxes not actually due, thus impairing the position of shareholders or other stakeholders.

6.4. Levels of risk tolerance, including tax risk (E.4)

The risk appetite is a key element in setting the risk strategy, since it determines the scope. The risk appetite that the Group is willing to assume in order to achieve its objectives is approved by the Board of Directors.

The Group has a Risk Appetite Framework (RAF) that sets out the governance framework regulating the risk appetite and, consequently, establishes the structure and mechanisms associated with the governance, definition, disclosure, management, measurement, monitoring and control of the Group's Risk Appetite as established by Banco Sabadell's Board of Directors.

Effective implementation of the RAF requires an appropriate combination of policies, processes, controls, systems and procedures to achieve a set of defined objectives, and to do so in an effective and continuous manner.

The Group also has a Risk Appetite Statement (RAS), which is a key element in determining the risk strategy, as it defines both qualitative aspects and quantitative metrics expressed in terms of capital, asset quality, liquidity, profitability or any other magnitude that is considered to be pertinent.

The qualitative aspects essentially enable the Group to define its position vis-à-vis certain risks when they are difficult to quantify.

The purpose of the quantitative metrics defined in the RAS is to provide objective elements for comparing the Group's situation with respect to the proposed risk management goals and challenges.

These quantitative metrics follow a hierarchical structure, as established in the RAF, structured in three levels: Board metrics (tier one), Executive metrics (tier two) and Operational metrics (tier three). Each level of metrics has its own mechanisms for approval, monitoring and action when thresholds are breached.

In order to be able, at an early stage, to detect a potential deterioration in the risk position and, consequently, be in a position to better monitor and oversee the situation, the RAS sets out a system of thresholds associated with quantitative metrics. These thresholds reflect the desirable risk levels for each metric, as well as the levels to be avoided, exceedance of which may trigger adaptation plans aimed at redressing the situation. The thresholds are graduated on the basis of severity, enabling preventive action to be taken before excessive levels are reached. Whether some or all the thresholds are set for a given metric will depend on its nature and its hierarchy within the RAS metric structure.

In addition to the Group's RAF and RAS, each subsidiary has a Local RAF and a Local RAS, which, based on the principle of proportionality, develop adapting it to the local situation.

As for tax risk, one of the main principles of the tax strategy referred to in section "6.1 Scope of the Bank's Risk Control and Management System, including that relating to tax risks (E1)" above is to minimise tax risk. This statement applies to all risks identified in section "6.3 Main risks (E3)" above.

6.5. Risks, including tax risks, that materialised during the year (E.5)

Finance inherently involves risk, and the materialization of such risk is inherent to the Group's business. The Group provides detailed information of the risks in Note 4 "Risk Management" in the Notes to the Consolidated Financial Statements of Banco Sabadell Group, which are available on the corporate website (www.grupobancosabadell.com – Information for shareholders and investors – Financial information – Annual Reports).

6.6. Response and supervision plans for the Bank's main risks, including tax risks, as well as the procedures applied by the Bank to ensure that the Board of Directors responds to emerging challenges (E.6)

In accordance with the provisions of the Risk Appetite Framework (RAF), the Group's Risk Appetite Statement (RAS) has a solid governance process which ensures its proper deployment to all participants in the decision-making process. Consequently, the RAS follows a set of guidelines for approval/review, regular monitoring and oversight (including notification of breaches) and deployment to Group subsidiaries.

Specifically, the mechanisms for regular tracking of the RAS ensure a high degree of involvement at all times by the Group's governing bodies, which must have an updated vision of compliance and adaptation to the Risk Appetite defined for the Group, making it possible to make informed decisions. Accordingly, depending on their nature and hierarchy, the metrics in the Group RAS are reported regularly to different echelons (including the Board of Directors and the Risk Committee) and committees, and there is a procedure for giving notice of breaches.

In the event of a breach, the RAF identifies the Governing Bodies and Committees that must receive notice of the breach, as well as the need to define an Adaptation Plan, and defines its main characteristics, such as the parties responsible for approving it, deadlines, and mandatory content.

The main mechanisms implemented by the Group for monitoring and supervising risks are the following:

- Risk governance through the definition of the Risk Appetite in the RAS (via quantitative metrics and qualitative aspects) and the set of risk policies.
- Evaluation of the risk profile through a systematic process that provides a comprehensive view of the risks and risk tracking.
- Regular reporting of risks, mainly via the Risk Committee scorecard, which facilitates risk tracking. Specifically, that reporting covers at least the principal risks, maintaining a balance between qualitative data and comments, and, where possible, it incorporates prospective measures, information on risk appetite limits and emerging risks. Oversight is also exercised to ensure a homogeneous integrated vision at Group level, without prejudice to including the local perspective.
- Forward-looking risk management by using stress scenarios in cases where this is considered to be meaningful, which also makes it possible to identify new risks.

The Group has also established an organizational model for assigning and coordinating risk control responsibilities based on the three lines of defence. This model is elaborated upon, for each risk, in the policies that make up the Group's body of regulations, in which specific responsibilities are established for each of the three lines of defence. In this regard, the risk policies set out and assign responsibilities, as appropriate, to the following functions:

- The first line of defence is directly responsible for the business and is in charge of identifying, quantifying, mitigating and managing risks based on an established framework. Accordingly, it is responsible for maintaining sufficient effective internal controls and for implementing corrective actions to remedy deficiencies in its processes and controls, and for defining a strategy for each risk.
- The second line of defence must ensure that the first line of defence is properly designed and fulfils its assigned functions, and it provides advice on continuous improvement. It is in charge of crosschecking the identification of current and emerging risks by the first line of defence, and of assessing the adequacy and effectiveness of their control environments. It also performs an annual assessment of the Group's risk profile.
- The third line of defence assists the Group in meeting its objectives by providing a systematic disciplined approach to assessing the adequacy and effectiveness of governance processes and of risk management and internal control activities in the organization.

More information regarding the systems for controlling the risks to which the Group is exposed can be found in the Annual Report, specifically Note 4 "Risk Management" of the Notes to the Consolidated Financial Statements of Banco Sabadell Group, available on the corporate website: www.grupobancosabadell.com – Shareholder and Investor Information – Financial Information – Annual Reports.



7. Internal control and risk management systems in relation to the financial reporting process (ICFR) (F)

7.1. Control environment (F.1)

7.1.1. Governance and governing bodies

Article 5 of the Board of Directors Regulation states that the Board of Directors is an instrument of supervision and control with responsibility for identifying the company's and the consolidated Group's main risks and implementing and monitoring suitable internal control and reporting systems, as well as setting policies on the reporting and disclosure of information to shareholders, the markets and the general public.

In addition, as provided in Article 16 of its Regulation, the Board of Directors delegates supervision of internal control systems to the Audit and Control Committee.

The functions of the Group's Internal Audit Division include supporting the Audit and Control Committee in supervising the proper design and implementation and effective functioning of the risk management and control systems, which include ICFR and ICSR.

The responsibilities of the Internal Control Division include ensuring effective control of all risks related to ICFR, as well as compliance with the established procedures and the alignment of risk management with the defined risk appetite.

The Finance Division contributes to implementing the general framework of the internal control systems that are rolled out across the entire organization.

Part of that contribution materialises in responsibility for designing and implementing internal control systems for financial reporting that ensure the accuracy of the financial information that is generated.

7.1.2. Positions of responsibility

The design and review of the organizational structure is the responsibility of the Organization and Corporate Projects Division, based on Banco Sabadell Group's Master Plan and current banking regulations. That Division analyzes and adapts the functions and organizational structure of each Division to bring it into line with the established objectives and the current regulations. Modifications to the organizational structure of the members of the Management Committee are submitted to the Board of Directors for approval, while modifications to the organizational structure of the reports to the members of the Management Committee are presented to the Management Committee for approval.

At the same time, the details of all the departments/units/offices are sent on a monthly basis to the People Division showing all the modifications that have been made, so that they can be equipped with the resources considered necessary to perform their duties.

The organization chart of Banco Sabadell Group arising from the above process addresses all the departments, areas and divisions into which Banco Sabadell Group is divided. This organization chart is

complemented by the policies and procedures of each Division, which determine the framework for action and the responsibilities of each unit of the Bank.

7.1.3. Code of conduct

The Banco Sabadell Group has a Group Code of Conduct that has been reviewed and updated and has been accepted by the personnel. The text, which was approved by the Board of Directors, is available to all members of the Group and they are required to expressly adhere to it. Its fundamental principles include a commitment to transparency and, in particular, it reflects the commitment to make all financial and corporate information available to shareholders. The purpose is to comply strictly with Banco Sabadell Group's obligation to offer reliable financial reporting prepared in accordance with the regulations so as to present a true and fair view of the company. It also sets out the responsibilities of its employees and executives to ensure this is so, via both proper discharge of their duties and notification to the governing bodies of any circumstance which might affect this commitment.

There is a Corporate Ethics Committee whose functions include fostering ethical behaviour throughout the organization, making proposals and advising both the Board of Directors and the various corporate and business units in connection with decisions that refer to issues that may lead to conflicts of values and/or interests.

Among the tasks carried out by the Corporate Ethics Committee is the analysis of compliance with the Code of Conduct or any other code or self-regulation. In order to perform its functions, it has access to the human and material resources of the Compliance Division. If, as a consequence of exercising its functions, it detects any non-compliance, it must advise the People Division for the application of corrective actions and sanctions. Additionally, the Corporate Ethics Committee has been designated by the Board of Directors as being in charge of supervision and compliance with the crime risk and anti-corruption organization and management model, and is also the body in charge of the internal information system.

The Crime Risk and Anti-Corruption Organization and Management Model is re-assessed every year and, as a sign of their commitment to it, personnel are required to sign on to the main underlying policies, the Criminal Liability Prevention Policy and the Anti-Corruption Policy.

In 2022, AENOR Internacional S.A.U. conducted a full audit to verify and certify that Banco Sabadell's model met the requirements of UNE 19601 for criminal compliance management systems and ISO 37001 for anti-bribery management systems. The bank obtained both certificates in early 2023. The certificates remained in place in 2024 and 2025 since the surveillance audits by AENOR were passed satisfactorily. The auditors identified no non-conformities with the model.

7.1.4. Whistleblower channel

As part of the commitment to a culture of ethics and compliance, there is an Internal Information System in place for reporting, generally, any actions or omissions that may constitute a breach of current legislation, the Banco Sabadell Group Code of Conduct or other internal regulations of the Group (including regulations on the prevention of money laundering and combating the financing of terrorism).

As the Group's controlling company, Banco Sabadell has a Whistleblower Channel available to its stakeholders and subsidiaries (except in Mexico and the United Kingdom, which have their own

channels), branches and representative offices in other countries, as a formal mechanism for reporting irregularities or infringements, and which forms part of the Group's Internal Information System, one of the guiding principles of its operation being the protection of the person presenting a query or report.

The Whistleblower Channel, hosted on a platform that can be accessed via the web (<https://canaldenunciasgrupo.bancsabadell.com>), is the primary means of reporting, detecting and managing possible irregularities that might jeopardise this commitment or entail a criminal offence. Any employee of the Group or any person related to it (subcontracted personnel, freelance service providers, suppliers, etc.) must report any information or indication of non-compliance with the Code of Conduct or of the possible commission of a crime of which they become aware.

Reports may be made openly or anonymously; in all cases, there is an assurance of confidentiality with respect to the identity of the person making a communication and of any other person involved, as well as any information provided, the protection of personal data, the right of defence, the presumption of innocence and the right to honour of all persons affected, and there is also a guarantee that there will not be any reprisals where the channel is used in good faith.

The Bank operates a policy and a procedure to enable and protect whistleblowers. The policy is published on the whistleblower platform and the corporate website. Both documents are also available on the corporate intranet to Group employees and anyone with a connection to the Group, where the principles and safeguards of the whistleblower channel and the way in which whistleblowing reports are handled step by step are described.

7.1.5. Training

As regards training and refresher programmes and particularly regarding the financial reporting process, the Finance Division provides training on the basis of emerging needs in order to address any new issues arising in connection with the Bank's internal accounting/finance processes, and applicable national and international regulations, together with training in the use of software, the goal being to facilitate management and oversight of the financial reporting process. The professionals in the Finance Division also participate regularly in workshops and events that deal with matters of accounting and prudential regulations that are applicable to the Bank.

Training is delivered chiefly by internal professionals of Banco Sabadell Group and by external experts who are specialists in the subject area.

In addition, the People Division places a series of financial training courses at the disposal of Banco Sabadell Group employees, which they can take online. The most notable courses refer to IFRS (International Financial Reporting Standards), financial mathematics, financial analysis and general tax matters.

The Internal Audit Division has a training plan in place for all its professionals which includes a Higher Specialist Programme in Internal Auditing of Credit Institutions (PSAI) at a prestigious academic institution. The course covers areas such as accounting principles and financial reporting, the basics of auditing, and financial risk monitoring and management. In addition, during 2025, members of the Internal Audit Division participated in workshops on regulatory developments. A large number of auditors are certified to the Internal Control – Integrated Framework of the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

7.2. Evaluation of financial reporting risks (F.2)

Banco Sabadell Group's process of identifying the risk of error or the probability of fraud in financial reporting is documented in a procedure that sets out the frequency, methods, types of risks and other basic features of the process.

The process covers all the financial reporting objectives (existence and occurrence; integrity; valuation; presentation, itemization and comparability; and rights and obligations) and focuses on identifying risks of material error based on transaction complexity, quantitative and qualitative materiality, complexity of the calculations and application of judgements and estimations, updated on a quarterly basis. In any event, if (i) circumstances not previously identified leading to the possibility of errors in the financial information, or (ii) material changes to the operations of Banco Sabadell Group arise during the year, the Finance Division evaluates the risks to be added to those already identified.

The process is subject to continuous assessment, considering aspects that may lead to modifications of the internal control model, such as regulatory changes and developments in the macroeconomic environment, new products, the modification of processes to generate financial information, or the identification of one-off transactions.

Once they have been identified, the latter are reviewed so as to analyse the potential risks of error for these types of transactions in each financial reporting objective. In the case of one-off transactions (i.e. quite complex non-recurring transactions), a specific analysis is performed on a half-yearly basis to assess whether new risks have arisen that need to be mitigated.

The process for identifying the consolidation scope is detailed in section "7.3. Control activities (F.3, F.6)" of this document.

In addition, the process considers the risk of error in certain processes not linked to specific transaction types but which are especially important in view of their impact on financial reporting, such as the process of reviewing judgements and estimates, significant accounting policies and the closing and consolidation process. In this respect, and with a view to covering the risks of these processes, Banco Sabadell Group has the control activities described in the next section "7.3 Control activities (F.3, F.6)" of this document. It should also be noted that the risk identification process takes into account the possible effects of other types of risks (operational, technology, financial, legal, reputational, environmental, etc.), insofar as these may affect the financial statements.

The aforementioned process is conducted and documented by the Global Financial Control Division and is supervised ultimately by the Audit and Control Committee.

7.3. Control activities (F.3, F.6)

7.3.1. Procedures for reviewing and authorising financial reporting

The procedure for reviewing and authorising Banco Sabadell Group's financial reporting to the markets commences with a review by the Finance Division. The separate and consolidated financial statements and the condensed interim consolidated financial statements for the six months ended 30 June are reviewed by the Audit and Control Committee prior to authorization for issue by the Board, as established in the Board Regulations. In accordance with its terms of reference, the Audit and Control Committee reads and discusses the information with the heads of the Finance and Internal Audit Divisions and with the external auditors prior to submission to the Board of Directors.

Once the Audit and Control Committee has vetted the information and either approved it or attached its comments, the CFO and CEO of Banco Sabadell certify the content of the financial statements and submit them to the Board of Directors for authorization. The consolidated condensed financial statements for the six-month period ended 30 June are audited by the statutory auditor. This audit is purely voluntary.

The Audit and Control Committee reviews the quarterly financial disclosures (income statement and trend of the main balance sheet items) before they are submitted to the Board of Directors. In addition, it tracks the most significant technical and accounting aspects, and the results, on a monthly basis.

With regard to the activities and controls directly relating to transactions that may have a significant impact on the financial statements, Banco Sabadell Group has descriptions of the controls in place to mitigate the risk of material error (intentional or otherwise) in the information reported to the markets. For the critical areas of Banco Sabadell Group, special emphasis is placed on developing solid descriptions of the activities and controls.

These descriptions contain information on what form the control activity should take, its purpose (risk to be mitigated), the party responsible for executing it and the frequency. The descriptions cover controls on the proper accounting, measurement, presentation and disclosure of these areas.

The Banco Sabadell Group also has procedures for mitigating the risk of error in processes not related to specific transactions. In particular, there are procedures defined for the accounting close which include the consolidation process and review procedures for material judgements and estimates, which are escalated to senior management and reported to the Audit and Control Committee.

With regard to the consolidation process within the accounting close, procedures have been implemented to ensure proper identification of the consolidation scope. In particular, the Banco Sabadell Group conducts a monthly analysis of the consolidation scope, requesting the necessary information from all subsidiaries; the analysis covers all types of corporate structures.

Judgements and estimates are reviewed at different levels by members of the Finance Division. In addition, in its financial statements the Banco Sabadell Group describes the most important areas in which judgements and estimates are made, together with the key assumptions made in this connection. It also has procedures for reviewing accounting estimates. In this regard, the main judgements and estimates relate to the accounting classification of financial assets and off-balance sheet exposures based on their credit risk, impairment losses on certain financial assets and off-balance sheet exposures, the assumptions used



in the actuarial calculations of liabilities and commitments for post-employment benefits, the useful life and impairment of property, plant and equipment and other intangible assets, the measurement of goodwill in consolidation, provisions and the consideration of contingent liabilities, the fair value of certain unlisted financial assets, the fair value of real estate assets, and the recoverability of non-monetizable deferred tax assets and tax credits.

The Banco Sabadell Finance Division has implemented a software application that includes and formalises all the ICFR controls referred to above while, at the same time, ensuring ongoing identification of new risks to be considered and updates to mitigating controls in each accounting close. This application enables the controls to be validated on time and properly with the aim of guaranteeing the reliability of the financial reporting. The software features are designed to take account of the recommendations in the CNMV's guide entitled "Internal Control over Financial Reporting in Listed Companies," based on the principles and good practices contained in the COSO (Committee of Sponsoring Organizations of the Treadway Commission) report.

In addition, in order to make the ICFR validation process more robust, the controls involved in ICFR are certified for the closing of the financial statements for the year and for the consolidated condensed financial statements for the six-month period ended 30 June. This process consists of three sequential levels of certification and flows hierarchically through the organization to the members of the Management Committee.

7.3.2. Internal control policies and procedures over information systems

Banco Sabadell Group uses information systems to maintain an adequate record and control of its operations and is, consequently, highly dependent on them working properly.

As part of the process to identify risks of error in financial reporting, Banco Sabadell Group identifies systems and applications are important in each of the areas or processes considered to be material. The identified systems and applications include those used directly in preparing the financial information and those that are important for ensuring that the controls to mitigate the risk of errors are effective.

The design and implementation of the applications define a methodological framework that establishes various points of control to ensure that the solution complies with user requirements and meets the required standards of reliability, efficiency and maintainability.

Any change regarding infrastructures or applications is handled via the change management service, which defines the change approval flow, which may be escalated to the Change Committee, with a definition of the impact and the possibility of roll-back.

The Technology Division sets out, in control policies and standards, the measures for managing and protecting the information systems to ensure the availability, integrity and confidentiality of data, and the resilience of systems in response to disruptions and cyberthreats. Such measures include:

- Measures to ensure secure access to data: access control, recertification, two-factor authentication, and system protection against malware.
- Measures to ensure monitoring and response to technological disruptions and cyber events: systems for monitoring and correlating security events, equipment monitoring and incident response (24x7), scheduled technical and business continuity testing, and data back-up and restoration.

- Measures to safeguard change management in infrastructure and data: technical and functional testing, change approval process.

This Division also engages in continuous review and assessment of information systems and security controls to ensure that the protection, prevention, detection, response and recovery measures are commensurate with the technological threats. The cybersecurity and resilience status is reported periodically to bodies such as the Board of Directors, the Risk Committee and the Management Committee.

7.3.3. Internal control policies and procedures for outsourced activities and appraisals

Banco Sabadell Group regularly examines whether activities carried out by third parties are material to the financial reporting process or might indirectly affect its reliability. To date, Banco Sabadell Group has not outsourced processes with a material impact on financial reporting. However, Banco Sabadell Group regularly uses reports from independent experts for measuring transactions that may materially affect the financial statements.

In 2025, the activities outsourced to third parties (assessments, appraisals and calculations by independent experts) were connected with real estate valuations, valuing equity holdings, measuring post-employment benefits for employees, reviewing goodwill/cash generating units, the recoverability of deferred tax assets, and reviewing the fair value of financial assets at amortized cost.

The units of Banco Sabadell Group responsible for these operations exercise oversight on the work of the external experts to check their competence, skills, accreditation and independence together with the validity of the data and methods used and the reasonableness of the assumptions applied, as described in the preceding section “7.3.1 Procedures for reviewing and authorising financial reporting”.

7.4. Information and reporting (F.4)

7.4.1. Function in charge of accounting policies

The Accounting Regulation and Financial Reporting Division (under the Group Accounting and Reporting Division) is the unit responsible for identifying and defining the accounting policies that affect the Banco Sabadell Group and for responding to queries concerning accounting from the subsidiaries and business units.

The Group Accounting and Reporting Division is responsible for informing Banco Sabadell Group senior management regarding new accounting standards, the results of their implementation and their impact on the financial statements of Banco Sabadell Group.

The functions of the Technical Committee on Accounting and Financial Disclosures include reviewing and updating policies related to financial reporting, approving general accounting standards and procedures, approving and reporting on the accounting treatment that is adopted to the Management Committee and the Audit and Control Committee, and determining the transactions that, in accordance with the established procedures, need to be cross-checked by an independent accounting expert.

Banco Sabadell Group has guides on accounting procedure that conform to the needs, requirements and dimension of Banco Sabadell Group; they set out and explain the rules for preparing financial reporting and describe how to apply the rules to Banco Sabadell's specific operations. These documents not only refer explicitly to the standards applied to each type of transaction but also elaborate upon and interpret them.

These documents are updated at least once per year. Significant modifications are notified to the dependent companies to which they are applicable.

7.4.2. Mechanisms for preparing financial reporting

The main IT systems and applications used in generating financial reporting by Banco Sabadell Group are centralised and interconnected. There are procedures and controls that monitor system development and maintenance, as well as their proper performance, continuity and security.

During consolidation and the preparation of the financial reporting, inputs such as the financial statements issued by Group subsidiaries are used in the established formats, together with the rest of the financial information required both for accounting harmonization and for meeting the disclosure requirements.

Banco Sabadell Group has consolidation software that incorporates a series of controls to ensure that the information received from subsidiaries is reliable and is processed properly, notably checks to ensure consolidation entries were posted correctly, an analysis of variations in all balance sheet and income statement items, variations in the results obtained with respect to proper insertion of Group undertakings' financial statements, the monthly and annual budget, and specific checks on the financial statements, in which the balance sheet and profit and loss account items are cross-checked.

The Banco Sabadell Group also relies on an IT tool for the preparation of the annual financial statements and directors' reports and the consolidated condensed financial statements and directors' report for the six-month period ending 30 June. The software makes it possible to add checks to ensure that the information in the accounts is internally coherent and that the arithmetic totals of the financial statements and the tables contained in the notes to financial statements are correct.

7.5. Supervision of system operation (F.5)

7.5.1. ICFR supervision

In accordance with the Board of Directors Regulation, the Audit and Control Committee is entrusted with oversight of Internal Audit. Additionally, the Audit and Control Committee's functions include advising the Board of Directors on the Internal Audit plan, assessing the outcome of each audit, and prioritising and tracking corrective measures.

The Bank's Internal Audit Division reports directly to the Audit and Control Committee, which grants it hierarchical and functional independence from the rest of Banco Sabadell's departments and positions the function at an appropriate level of the organization.

On the basis of its policy, which was approved by the Board of Directors, the functions of the Internal Audit Division include supporting the Audit and Control Committee in supervising the proper design and implementation, and the effective functioning, of the risk management and control systems.

The Internal Audit Plan that the Board of Directors approved at a meeting on 29 January 2025, based on a favourable report by the Audit and Control Committee, set out, *inter alia*, the actions to be implemented with respect to the areas or processes considered to have the highest residual risk on the basis of a risk assessment exercise. The actions set out in the Plan were implemented in 2025, prioritised as necessary to comply with the supervisor's requirements and to take account of the significant changes and exceptional transactions in the year, in some of which a review was conducted of the financial control environment and, in particular, the proper identification of risks in processes, as well as the sufficiency, design, implementation and effective operation of financial existing controls. The general controls on reporting systems indicated in the preceding section, "7.3.2 Internal control policies and procedures over information systems" are reviewed every year.

At each financial close, the Finance Division assesses the internal control model, considering its periodicity, the risks in the financial reporting processes, and the adequacy and effectiveness of the controls that mitigate them, and it produces and custodies evidence that each specific control was performed. The Finance Division also continuously evaluates aspects that may lead to changes in the internal control model — including regulatory changes, the introduction of new products, and amendments to Banco Sabadell's processes — and identifies the risks associated with them and designs controls to mitigate them; it also reviews the criticality of the controls and the changes in the materiality of processes with an accounting impact.

The responsibilities of the Internal Control Division include ensuring effective control of all risks related to ICFR, as well as compliance with the established procedures and the alignment of risk management with the defined risk appetite.

In addition to the aforementioned supervisory activities carried out by the ICFR Division, the Audit and Control Committee and the Internal Audit Division, in 2025 the external auditor reviewed the information relating to the ICFR, with no adverse findings in the auditor's report on "Information on ICFR" as indicated in section "7.6 External auditors' report (F.7)" in this report.

7.5.2. Detecting and managing weaknesses

The Audit and Control Committee meets at least once every three months (prior to the publication of the regulated disclosures) in order to obtain and analyze the necessary information to fulfil the functions entrusted to it by the Board of Directors in connection with supervising the process of producing and presenting the mandatory financial disclosures.

These meetings carry out an in-depth review of the annual and half-yearly accounts and the interim financial statements of the company together with the rest of the information made available to the market. To carry out this process, the Audit and Control Committee first receives all the documentation and meets with the CFO, the internal audit units and the external auditor (in the case of the annual and half-yearly accounts) in order to ensure proper application of the current accounting standards and the reliability of the financial reporting. In addition, this discussion process assesses any ICFR weaknesses that were identified, the proposals to correct them and the status of any actions that have been taken.

The Group's auditor has direct access to the Group's senior management and holds regular meetings to obtain the necessary information and to report on any control weaknesses detected during the audit. With regard to the latter, the external auditor submits a report each year to the Audit and Control Committee detailing any internal control weaknesses that were detected and any action plans that were implemented to remedy them.

7.6. External auditors' report (F.7)

Banco Sabadell Group submitted the ICFR information supplied to the markets for 2025 to the external auditor for review. The report by the external auditor (KPMG Auditores, S.L.) will be attached as an annex to this annual report on corporate governance once it is available.

The scope of the auditor's review is determined by "Guía de Actuación y Modelo de Informe del Auditor referidos a la Información relativa al Sistema de Control Interno sobre la Información Financiera (SCIIF) de las Entidades Cotizadas", issued by means of Circular E14/2013, dated 19 July 2013, of the Instituto de Censores Jurados de Cuentas de España.



8. Degree of compliance with corporate governance recommendations (G)

The degree to which Banco Sabadell complies with the recommendations in the Code of Good Governance for Listed Companies is detailed in section G of the Statistical Annex to the Annual Report on Corporate Governance 2025 attached to this report.

9. Other information (H)

Since 2017, Banco Sabadell has adopted the Code of Good Tax Practices approved by the Large Company Forum on 20 July 2010 and applies its recommendations.

Banco Sabadell is a member of the Large Company Forum and voluntarily files an "Annual Tax Transparency Report" with the Spanish tax authorities (AEAT)⁷.

Additionally, through its UK subsidiary, in 2014 it adopted the "Code of Practice on Taxation for Banks" promoted by the UK tax authorities, and is in compliance with its contents.

In April 2012, Banco Sabadell adopted the Code of Good Practice for the protection of mortgagors experiencing financial hardship (Royal Decree-Law 6/2012 of 9 March) and, on 16 December 2022, Banco Sabadell adopted the Code of Good Practices for mortgage debtors at risk of vulnerability (Royal Decree-Law 19/2022 of 22 November), and continues to adhere to it following the amendments made to the Code in December 2023 and to Royal Decree-Law 7/2024 of 11 November 2024.

The application of the Code of Good Practice for mortgage debtors at risk of vulnerability (Royal Decree-Law 19/2022) expired at the end of 2025, except for individuals residing in areas affected by the Valencia flash floods, for whom it will remain in force until the end of May 2026.

This annual corporate governance report was approved by Banco Sabadell's Board of Directors at a meeting on:

19/02/2026

No directors abstained or voted against the adoption of this report.

The English versions of this report and its statistical annex are translations of the originals in Spanish and are provided for information purposes only. In the event of a discrepancy, the original versions in Spanish shall prevail.

⁷ The Annual Tax Transparency Report for 2024 was filed with the Spanish tax authorities (AEAT) in October 2025.

Statistical annex

ISSUER IDENTIFICATION DATA

Date of end of reference year: 31/12/2025

Tax ID number: A-08000143

Company name:

BANCO DE SABADELL, S.A.

Business address:

PLAÇA DE SANT ROC 20 (SABADELL)

OWNERSHIP STRUCTURE

A.1. Complete the following table on the capital stock and related voting rights, including any shares with loyalty voting rights, as of year-end:

Indicate whether the Articles of Association provide for double votes for loyalty:

- ☐ Yes
☒ No

Date of last change	Share capital (€)	No. of shares	No. of voting rights
29/08/2025	627,959,716.50	5,023,677,732	5,023,677

Indicate whether there are different classes of shares, with different associated rights:

- ☐ Yes
☒ No

A.2. Detail direct and indirect owners of significant stakes at year-end, including directors with a significant stake:

Name of shareholder	Voting rights attributed to the shares (%)		Voting rights through financial instruments (%)		Total voting rights (%)
	Direct	Indirect	Direct	Indirect	
BLACKROCK INC.	0.00	7.18	0.00	0.05	7.23
MR. DAVID MARTÍNEZ GUZMÁN	0.00	3.86	0.00	0.00	3.86
ZURICH INSURANCE GROUP LTD	0.00	4.95	0.00	0.00	4.95

Detail the indirect holding:

Name of indirect shareholder	Name of direct shareholder	Voting rights attributed to the shares (%)	Voting rights through financial instruments (%)	Total voting rights (%)
BLACKROCK INC.	Subsidiaries of BLACKROCK, INC.	7.18	0.05	7.23
MR. DAVID MARTÍNEZ GUZMÁN	FINTECH EUROPE S.À.R.L.	3.86	0.00	3.86
ZURICH INSURANCE GROUP LTD	ZURICH INSURANCE COMPANY LTD, wholly owned by ZURICH INSURANCE GROUP LTD	4.95	0.00	4.95

A.3. Detail the shareholdings at year-end, regardless of the percentage, of the members of the Board of Directors who hold voting rights attributed to shares of the company or through financial instruments, excluding the directors identified in section A.2 above:

Name of director	Voting rights attributed to the shares (%)		Voting rights through financial instruments (%)		Total voting rights (%)	Voting rights that can be transferred through financial instruments (%)	
	Direct	Indirect	Direct	Indirect		Direct	Indirect
JOSEP OLIU CREUS	0.08	0.08	0.00	0.00	0.16	0.00	0.00
PEDRO FONTANA GARCÍA	0.00	0.00	0.00	0.00	0.00	0.00	0.00
CÉSAR GONZÁLEZ-BUENO MAYER WITTGENSTEIN	0.04	0.00	0.00	0.00	0.04	0.00	0.00
AURORA CATÁ SALA	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ANA COLONQUES GARCÍA-PLANAS	0.00	0.00	0.00	0.00	0.00	0.00	0.00
LLUÍS DEULOFEU FUGUET	0.00	0.00	0.00	0.00	0.00	0.00	0.00
MARÍA JOSÉ GARCÍA BEATO	0.02	0.00	0.00	0.00	0.02	0.00	0.00
MIREYA GINÉ TORRENS	0.00	0.00	0.00	0.00	0.00	0.00	0.00
MARÍA GLORIA HERNÁNDEZ GARCÍA	0.00	0.00	0.00	0.00	0.00	0.00	0.00
GEORGE DONALD JOHNSTON III	0.00	0.00	0.00	0.00	0.00	0.00	0.00
MARGARITA SALVANS PUIGBÒ	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Name of director	Voting rights attributed to the shares (%)		Voting rights through financial instruments (%)		Total voting rights (%)	Voting rights that can be transferred through financial instruments (%)	
	Direct	Indirect	Direct	Indirect		Direct	Indirect
MANUEL VALLS MORATÓ	0.00	0.00	0.00	0.00	0.00	0.00	0.00
DAVID VEGARA FIGUERAS	0.01	0.00	0.00	0.00	0.01	0.00	0.00
PEDRO VIÑOLAS SERRA	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Voting rights held by members of the Board of Directors (%)	0.24

Detail the indirect holding:

Name of director	Name of direct shareholder	Voting rights attributed to the shares (%)	Voting rights through financial instruments (%)	Total voting rights (%)	Voting rights that can be transferred through financial instruments (%)
No data					

Detail the total percentage of voting rights represented on the Board:

Total % of voting rights represented on the Board of Directors	0.24

A.7. Indicate whether shareholders' agreements that affect the company have been notified to the company as provided in articles 530 and 531 of the Capital Companies Law. If so, briefly describe the agreements and list the shareholders involved:

- ☐ Yes
☒ No

Indicate if the company is aware of any concerted action among its shareholders. If so, give a brief description:

- ☐ Yes
☒ No

A.8. Indicate if any natural or legal person exercises or can exercise control over the company in accordance with article 5 of the Securities Market Law. If so, identify that person:

☐ Yes

☒ No

A.9. Complete the next tables about the company's own shares:

At year-end:

No. of direct shares	No. of indirect shares (*)	Total % of share capital
25,705,644	0	0.512

(*) Through:

Name of direct shareholder	No. of direct shares
No data	0

A.11. Estimated free float:

	%
Estimated free float	83.26

A.14. Indicate whether the company has issued securities that are not traded on a regulated market in the European Union.

☐ Yes

☒ No

B. GENERAL MEETING OF SHAREHOLDERS

B.4. Indicate the attendance data for the general meetings held in the year to which this report refers and the two previous years:

	Attendance data				
Date of shareholders' meeting	% in attendance	% represented	% votes cast by distance		Total
			E-voting	Other	
23/3/2023	0.26	60.68	0.44	0.54	61.92
Of which free float:	0.10	60.66	0.44	0.54	61.74
10/4/2024	0.23	60.40	0.50	0.66	61.79
Of which free float:	0.07	56.79	0.50	0.66	58.02
20/03/2025	0.93	68.16	0.63	0.56	70.28
Of which free float:	0.76	61.67	0.63	0.56	63.62
6/8/2025 10:00.	0.76	68.12	0.93	1.30	71.11
Of which free float:	0.58	60.87	0.93	1.30	63.68
6/8/2025 13:00.	0.75	66.50	0.74	1.36	69.35
Of which free float:	0.57	59.25	0.74	1.36	61.92

B.5. B.5.Indicate whether any item on the agenda of the general meetings held during the year was not approved by the shareholders, for any reason:

- ☐ Yes
☒ No

B.6. Indicate whether there are any restrictions in the Articles requiring a minimum number of shares to attend the General Meeting or to vote by distance means:

- ☒ Yes
☐ No

Number of shares required to attend the General Meeting	1000
Number of shares required to vote by distance means	1000

C. STRUCTURE OF THE COMPANY'S ADMINISTRATION

C.1. Board of Directors

C.1.1. Maximum and minimum number of directors envisaged in the articles, and the number established by the general meeting:

Maximum number of directors	15
Minimum number of directors	11
Number of directors established by the general meeting	15

C.1.2. Complete the next table with the members of the board:

Name of director	Representative	Director category	Board position	Date of first appointment	Date of latest appointment	Appointment procedure
JOSEP OLIU CREUS		Other external	CHAIRMAN	29/03/1990	23/03/2023	GENERAL MEETING DECISION
PEDRO FONTANA GARCÍA		Independent	DEPUTY CHAIRMAN	27/07/2017	24/03/2022	GENERAL MEETING DECISION
CÉSAR GONZÁLEZ-BUENO MAYER		Executive	CHIEF EXECUTIVE OFFICER	17/12/2020	20/03/2025	GENERAL MEETING DECISION
AURORA CATÁ SALA		Independent	DIRECTOR	29/01/2015	23/03/2023	GENERAL MEETING DECISION
ANA COLONQUES GARCÍA-PLANAS		Independent	DIRECTOR	10/04/2024	10/04/2024	GENERAL MEETING DECISION
LLUÍS DEULOFEU FUGUET		Independent	DIRECTOR	28/07/2021	24/03/2022	GENERAL MEETING DECISION
MARÍA JOSÉ GARCÍA BEATO		Other external	DIRECTOR	24/05/2018	23/03/2023	GENERAL MEETING DECISION
MIREYA GINÉ TORRENS		Independent	DIRECTOR	26/03/2020	10/04/2024	GENERAL MEETING DECISION
MARÍA GLORIA HERNÁNDEZ GARCÍA		Independent	DIRECTOR	20/03/2025	20/03/2025	GENERAL MEETING DECISION
GEORGE DONALD JOHNSTON III		Independent	LEAD INDEPENDENT DIRECTOR	25/05/2017	24/03/2022	GENERAL MEETING DECISION

Name of director	Representative	Director category	Board position	Date of first appointment	Date of latest appointment	Appointment procedure
MARGARITA SALVANS PUIGBÓ		Independent	DIRECTOR	20/03/2025	20/03/2025	GENERAL MEETING DECISION
MANUEL VALLS MORATÓ		Independent	DIRECTOR	22/09/2016	20/03/2025	GENERAL MEETING DECISION
DAVID VEGARA FIGUERAS		Executive	DIRECTOR	28/05/2015	23/03/2023	GENERAL MEETING DECISION
PEDRO VINOLAS SERRA		Independent	DIRECTOR	23/03/2023	23/03/2023	GENERAL MEETING DECISION

Total number of directors	14

Indicate any directors who stepped down in the reporting period, due to resignation, removal or any other reason:

Name of director	Category at time of removal	Date of last appointment	Date of removal	Specialised committees of which he/she was a member	Indicate whether the removal took place before the end of tenure
LAURA GONZÁLEZ MOLERO	Independent	23/03/2023	20/03/2025	Audit and Control Committee and Remuneration Committee	YES
ALICIA REYES REVUELTA	Independent	26/03/2021	20/03/2025	Credit Delegated Committee and Risk Committee	YES
DAVID MARTÍNEZ GUZMÁN	Proprietary	24/03/2022	24/11/2025		YES

C.1.3. Complete the next table with the members of the board and their category:

EXECUTIVE DIRECTORS		
Name of director	Position in the company's organisation chart	Profile
CÉSAR GONZÁLEZ-BUENO MAYER WITTGENSTEIN	CHIEF EXECUTIVE OFFICER	BANKING/RETAIL & CORPORATE BANKING/FINANCIAL/REGULATORY/INTERNATIONAL / DIGITAL & IT (Digital Transformation) Dual degrees in Law and Business Administration from ICADE, Madrid, and an MBA from Yale School of Management, Connecticut (USA). Founder and CEO of ING Direct, N.V. Branch in Spain (1998-2010), General Manager for Spain, France, Italy and United Kingdom of ING Direct, N.V. (2004-2010), Regional Head of Europe at ING Bank (2010-2011), CEO of Novagalicia Banco (now Abanca) (2011-2013), CEO of Gulf Bank (2014-2016), CEO of ING Spain and Portugal (2017-2019), and non-executive director of TSB Bank, PLC and TSB Banking Group, PLC which are both part of the Banco Sabadell Group (2020-2021). He is Chairman of Banco Sabadell, S.A., IBM, and of Sabadell Consumer Finance, S.A.U., both part of the Banco Sabadell Group, and member of the Board of Trustees of Ciudad Escuela de los Muchachos Foundation.
DAVID VEGARA FIGUERAS	CRO	FINANCIAL / RISKS / ACADEMIC / REGULATORY. A graduate in economics from the Autonomous University of Barcelona, he holds an MA in economics from the London School of Economics. Formerly Secretary of State for the Economy in the Spanish government (2004-2009), Deputy Director of the International Monetary Fund (2010-2012) and Deputy Chief Executive Officer, Banking in the European Stability Mechanism (2012-2015). Member of the Supervisory Board of Hellenic Corporation of Assets and Participations, S.A. (2016-2022), and non-executive director of TSB Bank, PLC and TSB Banking Group, PLC, both of which are part of the Banco Sabadell Group (2020-2022). Associate professor in the Department of Economics, Finance and Accounting at ESADE (2015- 2018). Currently, independent director of Amadeus IT Group, S.A., member of the Board of Trustees of the Pasqual Maragall Foundation, trustee for life of the Gala-Salvador Dalí Foundation, Chairman of the Advisory Board of Roca Junyent, S.L.P., and Chairman of Foro Tertulias Hispano-Británicas.

Total number of executive directors	2
% of total Board	14.28 %

PROPRIETARY EXTERNAL DIRECTORS		
Name of director	Name of the significant shareholder whom the director represents or who proposed his/her appointment	Profile

Total number of proprietary directors	0
% of total Board	

INDEPENDENT EXTERNAL DIRECTORS	
Name of director	Profile
PEDRO FONTANA GARCÍA	BANKING / RETAIL BANKING / BUSINESS. Degree in Business from ESADE (Barcelona) and MBA from Harvard Graduate School of Business Administration, Boston, Massachusetts (USA). Regional Manager of Banco de Comercio (1978-1982), General Manager of Banca Mas Sardá (1983-1988), Chief Executive Officer of NH Hoteles (1989-1990), General Manager of COOB'92 (1990-1993), General Manager of Turisme de Barcelona (1993-1994), Chairman of Banca Catalana (1994-1999), General Manager of BBVA Catalonia (2000-2009), Executive Chairman of AREAS (Elior Group) (2012-2017), Deputy General Manager of Elior Group, S.A. (2017-2018), nominee of EMESA Corporación Empresarial, S.L. on the board of listed company Elior Group, S.A. (2018-2019), and director of Fira Internacional de Barcelona (2011-2023). Independent director of Grupo Indukern, S.L. and of Pax Lux Equityco, S.A., Chairman of My Chef Ristorazione Commerciale, S.P.A., and director of MdF Family Partners, S.A., Honorary President of Asociación para el Progreso de la Dirección - Catalonia Chapter, Chairman of the Board of Trustees of Fundació Privada Cercle d'Economia, and trustee of Fundación Barcelona Mobile World Capital. Member of the boards of trustees of Universitat Ramon Llull Fundació, Fundación Grupo Sifu, Fundación Formación y Futuro and of Fundació Acció Solidària Contra l'Atur.

INDEPENDENT EXTERNAL DIRECTORS	
Name of director	Profile
AURORA CATÁ SALA	BUSINESS / CONSULTING / FINANCE / HUMAN RESOURCES Degree in Industrial Engineering (major in Industrial Organisation) from the Polytechnic University of Catalonia and MBA and PADE from IESE Barcelona. Formerly CFO of Nissan Motor Ibérica, S.A. (1990-1996), General Manager of RTVE Cataluña (1996-1999), Managing Director of Planeta 2010 (1999-2003), General Manager of Audiovisual Media at Recoletos Grupo de Comunicación (2003-2008), Partner of Seeliger y Conde (2009-2020), independent director of Institut Català de Finances (2014), independent director of Atresmedia Corporación de Medios de Comunicación, S.A. (2009-2021), director of Sabadell Information Systems, S.A., Banco Sabadell's technology subsidiary (2020-2022), Chairman of Barcelona Global (2020-2022), independent director of Atrys Health, S.A. (2021-2024), Deputy Chairman of 37th America's Cup Events, and Trustee of Fundación Cellnex (2023-2025). Formerly held a number of directorships. Currently, independent director of Repsol, S.A., member of the Executive Committee of IESE alumni, and General Secretary of Fundación CIDOB.
ANA COLONQUES GARCÍA-PLANAS	BUSINESS / FINANCE / AUDITOR Degree in Business Administration and MBA from ESADE. Auditor at Deloitte (2006-2010), specialized in auditing financial institutions. Risk analyst at Banco Sabadell (2010-2011). Director of Iberdrola España, S.A. (2021-2024). Currently, CFO, executive director and deputy-secretary of Porcelanosa, S.A.U., holding other positions in governing bodies at Porcelanosa Group companies. Independent director of Iberdrola, S.A. and member of the Appointments Committee of Iberdrola, S.A. Member of the Valencia Regional Board of the Asociación Española de Directivos.

INDEPENDENT EXTERNAL DIRECTORS	
Name of director	Profile
LLUÍS DEULOFEU FUGUET	BANKING/RETAIL BANKING/DIGITAL & IT (Digital Transformation)/BUSINESS/CONSULTING Degree in Telecommunications Engineering from the Polytechnic University of Catalonia and has completed the "Finance for Executives" programme at ESADE and the PDG at IESE (Barcelona). Senior Manager at Andersen Consulting (1988-1994), Head of Technical Services & Development of New Projects at Acesa (1994-2001), Chief Technology Officer at La Caixa (2001-2011), Managing Director for Internal Resources and Efficiency at Abertis Infraestructuras (2011-2014). Managing Director of Sanef (2014-2018) and Deputy CEO of Cellnex Telecom (2018-2020). Founder and director of Acesa Telecom (now Cellnex Telecom), and founder and director of Parc Logístic de la Zona Franca, as well as Vice-President of Fundació Catalana de Recerca i Innovació and Chairman of Fundación Cellnex, Trustee of Fundación Barcelona Digital, as well as director of numerous undertakings such as e-La Caixa, Abertis Telecom, Invercaixa Gestión, Sanex, Xfera, Cellnex Telecom, Hispasat, and DDST-Tradia. He has been a director of Sabadell Digital, S.A.U., Banco Sabadell's technology subsidiary, since 2020.
MIREYA GINÉ TORRENS	FINANCIAL/ACADEMY/GOVERNANCE/DIGITAL & IT (Digital Transformation) BA and MA (Cum Laude) in Economics from Pompeu Fabra University, and PhD from the University of Barcelona. Director of International Initiatives, Wharton Research Data Services (WRDS) since 2012. She is currently professor and director of the Department of Financial Management at IESE Business School. Researcher at the European Corporate Governance Institute since 2018. A member of the World Economic Forum's network of experts (corporate governance) since 2019, and member of the Center for Economic Policy since 2020. Independent director of Sabadell Asset Management (2018-2020). Proprietary director of Sabadell Consumer Finance, S.A.U.

INDEPENDENT EXTERNAL DIRECTORS	
Name of director	Profile
MARÍA GLORIA HERNÁNDEZ GARCÍA	BANKING/RETAIL & CORPORATE BANKING/FINANCE Degree in Economics, major in Economic Theory, from the Complutense University of Madrid (1981); she holds a Spanish State Commercial Diploma (1983) and qualified as a Trade Expert and Economist in the Spanish Civil Service (1988). Her training includes specialized postgraduate studies in the areas of financial management and corporate strategy for directors. She also has specific training for the position of director and in sustainability from prestigious business schools such as Chicago Booth, IESE Business School, ESADE and CFA Institute. She held various positions in the Directorate-General for Foreign Transactions (1982–1989) and the Directorate-General for the Treasury (1989–1999) until her appointment as Director-General for the Treasury and Finance Policy (1999–2003). During the same period, she was a director representing the State in various public companies and a director of the Bank of Spain and the CNMV. CFO and member of the management committee of Banco Pastor (2003-2011). General Manager of Capital Markets (2011–2015) and Chief Financial Officer (2016–2019) of Bankinter. She has held positions on the boards of directors of companies in various sectors. She was an independent director of Siemens Gamesa (2015-2022), and of BanSabadell Seguros Generales, Bansabadell Vida and Bansabadell Pensiones, which are insurance companies related to the Banco Sabadell Group (2024-2025). She is currently an independent director of Nortegas Energía Grupo, Sociedad Anónima, and of Distribuidora Internacional de Alimentación (DIA), S.A.
GEORGE DONALD JOHNSTON III	BANKING / CORPORATE BANKING / INTERNATIONAL BA in Political Science from Middlebury College, Vermont (USA), and MA in International Economics and Latin American Studies from Johns Hopkins University School of Advanced International Studies, Washington DC. (USA). Executive director at Salomon Brothers (1979-1990), Director of Bankers Trust International and member of its Global Executive Committee (1992-1999), Group Head of M&A for Europe and Member of the Europe Executive Committee and of the Global Operating Committee within the investment banking division of Deutsche Bank (1999-2005), Chairman of the M&A Group for Europe at Deutsche Bank (2005-2010). Currently, lead independent director of Acerinox, S.A. and lead independent director of Merlin Properties, SOCIMI, S.A.

INDEPENDENT EXTERNAL DIRECTORS	
Name of director	Profile
MARGARITA SALVANS PUIGBÒ	BANKING/ RETAIL BANKING/ BUSINESS/ FINANCE/ RISK Degree in Business Administration and Management from Pompeu Fabra University, Barcelona (2001) and MBA from IESE Business School (2006). Consultant at Boston Consulting Group (2001–2004), controller at Caixa Terrassa (2006–2007) and Controller at Caixa Catalunya, Tarragona i Manresa (2008–2010). She held various positions in the finance department at Catalunya Caixa (2011–2013), during which time she was a director of the UCIT management company Catalunya Caixa Inversió, SGIIC, S.A.U., and a member of the Control Committee of a Catalunya Caixa pension fund. She joined Mango in 2013, holding various positions until her appointment as Chief Financial Officer and member of the Management Committee (2020), a position she continues to hold. Member of the Board of Directors of Mango since March 2024 and sole director of various companies within the Mango Group.
MANUEL VALLS MORATÓ	AUDITOR/FINANCE Degree in Economics and Business Studies from the University of Barcelona and a post-graduate qualification in Business Administration from IESE/University of Navarra; he is a registered auditor and a member of Spain's official register of auditors since its creation. Partner of PwC (1988-2013), Head of the Audit Division at PwC (2006-2013) and Chairman of PwC Auditores (2006-2011). Independent member of the Governing Board of Institut Català de Finances (2015-2016), and director of Sabadell Information Systems, S.A., Banco Sabadell's technology subsidiary (2020-2022). Currently, Lead independent director of listed company Renta Corporación Real Estate, S.A. and Chairman of the Audit, Control and Risk Committee at COBEGA, S.A.
PEDRO VIÑOLAS SERRA	BANKING/CORPORATE BANKING/BUSINESS/FINANCE/ Degree in Business Administration from the University of Barcelona and Degree in Business Administration and MBA from ESADE and the Polytechnic University of Catalonia. He has held a number of positions in the Barcelona Stock Exchange (1988-1997): Director of the Research Department, Deputy General Manager in charge of the Research and Corporate Development Department, Finance, Market Supervision, International Relations and subsidiaries. CEO of Filo (1997-2002), a listed real estate group. Partner & CEO of Grupo Financiero Riva y Garcia (2003-2008). He has been director of Grupo Mecanotubo (2006-2010), of SIIC de Paris (2010-2014) and of Grupo Electro Stocks (2011-2020). He has been CEO of Colonial SFL, Socimi, S.A. (formerly Inmobiliaria Colonial, Socimi, S.A.) since 2008 and Deputy Chairman since 2019, holding other positions in governing bodies at Colonial Group companies. He is an independent director of Blue Self Storage, S.L. director of the European Real Estate Association and trustee of Fundación ESADE.

Total number of independent directors	10
% of total Board	71.43 %

Indicate whether any director classified as independent receives, from the company or the same group, any amount or benefit under a heading other than director remuneration, or holds or has held, during the last year, a business relationship with the company or any other company in its group, either in his/her own name or as a significant shareholder, director or senior manager of an institution that holds or has held such a relationship.

If yes, give the reasons why it is considered that the director qualifies as an independent director.

Name of director	Description of the relationship	Disclosure with rationale
No data		

OTHER EXTERNAL DIRECTORS

Identify the other external directors and detail the reasons why they cannot be classified as proprietary or independent, and any relations they have with the company, its executives or its shareholders:

Name of director	Reason	Company, executive or shareholder to which he/she is related	Profile
JOSEP OLIU CREUS	Performed executive functions until 26 March 2021 and in accordance with the Capital Companies Law.	BANCO DE SABADELL, S.A.	BANKING/RETAIL & CORPORATE BANKING/FINANCIAL/ACADEMIC/BUSINESS/INTERNATIONAL Degree in Economics from the University of Barcelona and a PhD in Economics from the University of Minnesota (USA). Professor of Economic Theory at the University of Oviedo. Head of Studies and Strategy (1983-1984) and Head of Planning (1984-1987) at Spain's National Institute of Industry (INI). Appointed Director-General Manager of Banco Sabadell in 1990. Chairman of Banco Sabadell since 1999. Non-executive Chairman of Exea Quorum, S.L. and the latter's representative as Chairman of Exea Inversión Empresarial, S.L., representative of Quaestor Ventures, S.A. as Chairman of Exea Ventures, S.L. and director of Puig Brands, S.A. Chairman of the Banco Sabadell Foundation, member of FEDEA (Fundación de Estudios de Economía Aplicada) and member of the Boards of Trustees of the Princess of Asturias Foundation and of the Princess of Girona Foundation.

OTHER EXTERNAL DIRECTORS			
Identify the other external directors and detail the reasons why they cannot be classified as proprietary or independent, and any relations they have with the company, its executives or its shareholders:			
Name of director	Reason	Company, executive or shareholder to which he/she is related	Profile
MARÍA JOSÉ GARCÍA BEATO	Performed executive functions until 31 March 2021 and in accordance with the Capital Companies Act.	BANCO DE SABADELL, S.A.	BANKING / LAW / REGULATORY / GOVERNANCE Degree in Law and Diploma in Criminology. Spanish State Attorney (1991). Former positions include State Attorney at the Madrid High Court of Justice, Legal Counsel at the Data Protection Agency, State Attorney as consultant to the State Legal Service, Head of the General Secretariat of Communications, and State Attorney at the National Court. Chief of Staff and Under-Secretary at the Ministry of Justice (2000-2004). She has been General Counsel (2005-2008) and General Secretary (2008-2021) and an executive director (2018-2021) of Banco Sabadell. Independent director of listed company Red Eléctrica Corporación, S.A. (2012-2021), director of Papelera Guipuzcoana de Zicuñaga, S.A.U. (2022), and non-executive director of MdF Family Partners, S.A. (2021-2024). Currently, independent director of ACS, Actividades de Construcción y Servicios, S.A., independent director of Iberpapel Gestión, S.A. and independent member of the General and Supervisory Board of EDP Energias de Portugal S.A. Member of the Boards of Trustees of the Banco Sabadell Foundation, the Spanish Banking Association Foundation and the ACS Foundation.

Total number of other external directors	2
% of total Board	14.28 %

Indicate any changes in each director's status in the period.

Name of director	Date of change	Previous category	Current category
No data.			

C.1.4. Complete the following table with information on the number of female directors at the end of the last four years, and their category:

	Number of female directors				% of total directors in each category			
	2025	2024	2023	2022	2025	2024	2023	2022
Executive								
Proprietary								
Independent	5	5	4	4	50.00	50.00	40.00	40.00
Other external	1	1	1	1	50.00	50.00	50.00	50.00
Total	6	6	5	5	42.86	40.00	33.33	33.33

C.1.11. List any positions of director, administrator or representative of same held in other undertakings, listed or otherwise, by the directors or representatives of directors who are members of the company's board:

Director or representative	Name of entity, listed or otherwise	Position
MR. JOSEP OLIU CREUS	EXEA QUÓRUM, S.L.	CHAIRMAN
MR. JOSEP OLIU CREUS	EXEA INVERSIÓN EMPRESARIAL, S.L.	CHAIRMAN'S REPRESENTATIVE
MR. JOSEP OLIU CREUS	EXEA VENTURES, S.L.	CHAIRMAN'S REPRESENTATIVE
MR. JOSEP OLIU CREUS	PUIG BRANDS, S.A.	DIRECTOR
MR. JOSEP OLIU CREUS	BARCELONA GRADUATE SCHOOL OF ECONOMICS FUNDACIÓN PRIVADA	TRUSTEE
MR. JOSEP OLIU CREUS	FUNDACIÓ BOSCH I CARDELLACH	TRUSTEE
MR. JOSEP OLIU CREUS	FUNDACIÓN DE ESTUDIOS DE ECONOMÍA APLICADA	TRUSTEE
MR. JOSEP OLIU CREUS	FUNDACIÓ PRIVADA BANC SABADELL	CHAIRMAN
MR. JOSEP OLIU CREUS	FUNDACIÓN PRINCESA DE GIRONA	TRUSTEE
MR. JOSEP OLIU CREUS	FUNDACIÓN PRINCESA DE ASTURIAS	TRUSTEE
MR. PEDRO FONTANA GARCÍA	GRUPO INDUKERN, S.L.	DIRECTOR
MR. PEDRO FONTANA GARCÍA	PAX LUX EQUITYCO, S.A.	DIRECTOR
MR. PEDRO FONTANA GARCÍA	MY CHEF RISTORAZIONE COMMERCIALE, S.P.A.	CHAIRMAN
MR. PEDRO FONTANA GARCÍA	GARNIEL, S.L.	SOLE ADMINISTRATOR
MR. PEDRO FONTANA GARCÍA	ASOCIACIÓN PARA EL PROGRESO DE LA DIRECCIÓN – APD CATALUÑA (HONORARY CHAIRMAN)	CHAIRMAN
MR. PEDRO FONTANA GARCÍA	MDF FAMILY PARTNERS, S.A.	DIRECTOR
MR. PEDRO FONTANA GARCÍA	FUNDACIÓN BARCELONA MOBILE WORLD CAPITAL	TRUSTEE

Director or representative	Name of entity, listed or otherwise	Position
MR. PEDRO FONTANA GARCÍA	FUNDACIÓ PRIVADA CERCLE D'ECONOMÍA	CHAIRMAN
MR. PEDRO FONTANA GARCÍA	UNIVERSITAT RAMON LLULL FUNDACIÓ	TRUSTEE
MR. PEDRO FONTANA GARCÍA	FUNDACIÓN GRUPO SIFU	TRUSTEE
MR. PEDRO FONTANA GARCÍA	FUNDACIÓN FORMACIÓN Y FUTURO	TRUSTEE
MR. PEDRO FONTANA GARCÍA	FUNDACIÓ ACCIÓ SOLIDÀRIA CONTRA L'ATUR	TRUSTEE
MR. CÉSAR GONZALEZ-BUENO MAYER WITTGENSTEIN	SABADELL CONSUMER FINANCE, S.A.U.	CHAIRMAN
MR. CÉSAR GONZALEZ-BUENO MAYER WITTGENSTEIN	BANCO SABADELL, S.A. IBM	CHAIRMAN
MR. CÉSAR GONZALEZ-BUENO MAYER WITTGENSTEIN	FUNDACIÓN CIUDAD ESCUELA DE LOS MUCHACHOS	TRUSTEE
MS. AURORA CATÁ SALA	REPSOL, S.A.	DIRECTOR
MS. AURORA CATÁ SALA	BOZO CONSULTING, S.L.	JOINT ADMINISTRATOR
MS. AURORA CATÁ SALA	LIZARD INVERSIONES, S.L.	JOINT ADMINISTRATOR
MS. AURORA CATÁ SALA	AK CONSULTING 2026, S.L.	JOINT ADMINISTRATOR
MS. AURORA CATÁ SALA	FUNDACIÓN CIDOB	SECRETARY GENERAL
MS. ANA COLONQUES GARCÍA-PLANAS	PORCELANOSA, S.A.U.	DIRECTOR AND DEPUTY-SECRETARY
MS. ANA COLONQUES GARCÍA-PLANAS	PORSAFIN GRUPO, AIE	CHAIRMAN AND CEO
MS. ANA COLONQUES GARCÍA-PLANAS	PORCELANOSA BATIMAT, S.A.U.	JOINT ADMINISTRATOR
MS. ANA COLONQUES GARCÍA-PLANAS	GAMA-DECOR, S.A.U.	JOINT ADMINISTRATOR
MS. ANA COLONQUES GARCÍA-PLANAS	KRION SOLID SURFACE, S.A.U.	JOINT ADMINISTRATOR
MS. ANA COLONQUES GARCÍA-PLANAS	L'ANTIC COLONIAL, S.A.U.	JOINT ADMINISTRATOR
MS. ANA COLONQUES GARCÍA-PLANAS	BUTECH BUILDING TECHNOLOGY, S.A.U.	JOINT ADMINISTRATOR
MS. ANA COLONQUES GARCÍA-PLANAS	NOKEN DESIGN, S.A.U.	JOINT ADMINISTRATOR
MS. ANA COLONQUES GARCÍA-PLANAS	URBAN INCENTIVES, S.L.U.	JOINT ADMINISTRATOR
MS. ANA COLONQUES GARCÍA-PLANAS	IBERDROLA, S.A.	DIRECTOR
MS. ANA COLONQUES GARCÍA-PLANAS	MOSEL INTERNATIONAL S.L.	DIRECTOR
MS. ANA COLONQUES GARCÍA-PLANAS	ASOCIACION ESPAÑOLA DE DIRECTIVOS - VALENCIA REGION	DIRECTOR
MR. LLUÍS DEULOFEU FUGUET	SABADELL DIGITAL, S.A.U.	DIRECTOR
MR. LLUÍS DEULOFEU FUGUET	EIXAMPLE 2 ASSESSORS, S.L.	JOINT ADMINISTRATOR
MR. LLUÍS DEULOFEU FUGUET	FUNDACIÓN CELLNEX	CHAIRMAN

Director or representative	Name of entity, listed or otherwise	Position
MS. MARÍA JOSÉ GARCÍA BEATO	ACS, ACTIVIDADES DE CONSTRUCCION Y SERVICIOS, S.A.	DIRECTOR
MS. MARÍA JOSÉ GARCÍA BEATO	IBERPAPEL GESTIÓN, S.A.	DIRECTOR
MS. MARÍA JOSÉ GARCÍA BEATO	EDP ENERGIAS DE PORTUGAL, S.A.	DIRECTOR
MS. MARÍA JOSÉ GARCÍA BEATO	FUNDACIÓ PRIVADA BANC SABADELL	TRUSTEE
MS. MARÍA JOSÉ GARCÍA BEATO	FUNDACIÓN ASOCIACIÓN ESPAÑOLA DE BANCA	TRUSTEE
MS. MARÍA JOSÉ GARCÍA BEATO	FUNDACIÓN ACS	TRUSTEE
MS. MIREYA GINÉ TORRENS	SABADELL CONSUMER FINANCE, S.A.U.	DIRECTOR
MS. MIREYA GINÉ TORRENS	REAL ANALYSYS, S.L.	SOLE ADMINISTRATOR
MARÍA GLORIA HERNÁNDEZ GARCÍA	NORTEGAS ENERGÍA GRUPO, SOCIEDAD ANÓNIMA	DIRECTOR
MARÍA GLORIA HERNÁNDEZ GARCÍA	DISTRIBUIDORA INTERNACIONAL DE ALIMENTACIÓN, S.A.	DIRECTOR
MR. GEORGE DONALD JOHNSTON III	ACERINOX, S.A.	LEAD INDEPENDENT DIRECTOR
MR. GEORGE DONALD JOHNSTON III	MERLIN PROPERTIES, SOCIMI, S.A.	LEAD INDEPENDENT DIRECTOR
MR. GEORGE DONALD JOHNSTON III	YANKEE KINGDOM ADVISORY, LLC	SOLE ADMINISTRATOR
MARGARITA SALVANS PUIGBÒ	MANGO MNG, S.A.	EXECUTIVE DIRECTOR
MARGARITA SALVANS PUIGBÒ	INVESTMENTS AKNAM S.A.	SOLE ADMINISTRATOR
MARGARITA SALVANS PUIGBÒ	INVESTMENTS ANSAVE S.A.	SOLE ADMINISTRATOR
MARGARITA SALVANS PUIGBÒ	DARDANELOS INVERSIONES S.A.	SOLE ADMINISTRATOR
MARGARITA SALVANS PUIGBÒ	DEREK INVESTMENT S.A.	SOLE ADMINISTRATOR
MARGARITA SALVANS PUIGBÒ	AFYON INVESTMENTS S.A.	SOLE ADMINISTRATOR
MARGARITA SALVANS PUIGBÒ	FOURSOME S.A.	SOLE ADMINISTRATOR
MARGARITA SALVANS PUIGBÒ	INVERSIONES GIRALDA S.A.	SOLE ADMINISTRATOR
MARGARITA SALVANS PUIGBÒ	KAYSERI INVERSIONES S.A.	SOLE ADMINISTRATOR
MARGARITA SALVANS PUIGBÒ	TOPKAPI INVERSIONES S.A.	SOLE ADMINISTRATOR
MR. MANUEL VALLS MORATÓ	RENTA CORPORACIÓN REAL ESTATE, S.A.	LEAD INDEPENDENT DIRECTOR
MR. MANUEL VALLS MORATÓ	COBEGA, S.A. (Audit, Control and Risk Committee)	CHAIRMAN
MR. MANUEL VALLS MORATÓ	ERBERA M&A, S.L. (DORMANT)	JOINT ADMINISTRATOR
MR. DAVID VEGARA FIGUERAS	AMADEUS IT GROUP, S.A.	DIRECTOR
MR. DAVID VEGARA FIGUERAS	FUNDACIÓN PASQUAL MARAGALL	TRUSTEE

Director or representative	Name of entity, listed or otherwise	Position
MR. DAVID VEGARA FIGUERAS	FUNDACIÓN GALA-SALVADOR DALÍ	TRUSTEE
MR. PEDRO VIÑOLAS SERRA	COLONIAL SFL, SOCIMI, S.A.	DEPUTY CHAIRMAN AND CEO
MR. PEDRO VIÑOLAS SERRA	UTOPICUS INNOVACIÓN CULTURAL, S.L.	CHAIRMAN
MR. PEDRO VIÑOLAS SERRA	INMOCOL TORRE EUROPA, S.A.	DIRECTOR
MR. PEDRO VIÑOLAS SERRA	COLONIAL TRAMIT, S.L.	ADMINISTRATOR'S REPRESENTATIVE
MR. PEDRO VIÑOLAS SERRA	INMOCOL ONE, S.A.	ADMINISTRATOR'S REPRESENTATIVE
MR. PEDRO VIÑOLAS SERRA	INMOCOL TWO, S.L.	ADMINISTRATOR'S REPRESENTATIVE
MR. PEDRO VIÑOLAS SERRA	COLONIAL LAB, S.L.	ADMINISTRATOR'S REPRESENTATIVE
MR. PEDRO VIÑOLAS SERRA	COLONIAL LIVING, S.L.	ADMINISTRATOR'S REPRESENTATIVE
MR. PEDRO VIÑOLAS SERRA	BLUE SELF STORAGE, S.L.	DIRECTOR'S REPRESENTATIVE
MR. PEDRO VIÑOLAS SERRA	VALUE BASED MANAGEMENT, S.L.	SOLE ADMINISTRATOR
MR. PEDRO VIÑOLAS SERRA	FUNDACIÓN ESADE	TRUSTEE
MR. PEDRO VIÑOLAS SERRA	EUROPEAN PUBLIC REAL ESTATE ASSOCIATION	DIRECTOR

COMMENTS

The positions indicated in foundations and other non-profit undertakings listed above relate to members of the Board of Trustees or their nominees. Below is a list of undertakings in which the directors of Banco de Sabadell, S.A. hold remunerated positions: ACERINOX, S.A.; ACS, ACTIVIDADES DE CONSTRUCCION Y SERVICIOS, S.A.; AMADEUS IT GROUP, S.A.; BLUE SELF STORAGE, S.L.; COBEGA, S.A.; COLONIAL SFL, SOCIMI, S.A.; DISTRIBUIDORA INTERNACIONAL DE ALIMENTACIÓN, S.A.; EDP ENERGIAS DE PORTUGAL, S.A.; EXEA QUÓRUM, S.L.; IBERDROLA, S.A.; IBERPAPEL GESTIÓN, S.A.; GRUPO INDUKERN, S.L.; MANGO MNG, S.A.; MDF FAMILY PARTNERS, S.A.; MERLIN PROPERTIES, SOCIMI, S.A.; MOSEL INTERNATIONAL, S.L.; MY CHEF RISTORAZIONE COMMERCIALE, S.P.A.; NORTEGAS ENERGÍA GRUPO, SOCIEDAD ANÓNIMA; PAX LUX EQUITYCO, S.A.; PORCELANOSA, S.A.U.; PUIG BRANDS, S.A.; REAL ANALYSIS, S.L.; RENTA CORPORACIÓN REAL ESTATE, S.A.; REPSOL, S.A.; SABADELL CONSUMER FINANCE, S.A.U. (only as an independent director of Banco Sabadell); SABADELL DIGITAL, S.A.U.

Indicate any other remunerated activities of the directors or representatives of the directors, whatever their nature, other than those indicated in the table above.

Director or representative	Other remunerated activities
MS. ANA COLONQUES GARCÍA-PLANAS	CFO of PORCELANOSA S.A.U.
MS. MARÍA JOSÉ GARCÍA BEATO	ATTORNEY (FREELANCE PROFESSIONAL)
MS. MIREYA GINÉ TORRENS	PROFESSOR AND DIRECTOR OF THE FINANCIAL MANAGEMENT DEPARTMENT AT IESE BUSINESS SCHOOL
MS. MARGARITA SALVANS PUIGBÒ	CFO of MANGO MNG, S.A.
MR. DAVID VEGARA FIGUERAS	CHAIRMAN OF THE ADVISORY BOARD OF ROCA JUNYENT, S.L.P.

C.1.12. Indicate whether the company has established rules about the maximum number of directorships that board members can hold; describe any such rules and detail where they are regulated:

- ☒ **Yes**
☐ **No**

C.1.13. Indicate the amounts of the following items of the overall remuneration for the Board of Directors:

Remuneration earned by the Board of Directors in the year (thousand euro)	11,153
Vested amount accumulated by current directors in long-term savings plans (thousand euro)	5,112
Amount of funds accumulated by current directors in long-term savings plans with non-vested financial rights (thousand euro)	9,094
Amount accumulated by former directors in long-term savings plans (thousand euro)	7,591

C.1.14. Indicate senior management members who are not executive directors and the total remuneration accrued to them in the year:

Name	Position(s)
MR. GONZALO BARETTINO COLOMA	SECRETARY GENERAL
MS. ELENA CARRERA CRESPO	GENERAL MANAGER
MR. SERGIO ALEJANDRO PALAVECINO TOMÉ	GENERAL MANAGER
MR. CRISTÓBAL PAREDES CAMUÑAS	GENERAL MANAGER
MR. CARLOS PAZ RUBIO	GENERAL MANAGER
MR. MARCOS PRAT ROJO	GENERAL MANAGER
MS. SONIA QUIBUS RODRÍGUEZ	GENERAL MANAGER
MR. JORGE RODRÍGUEZ MAROTO	GENERAL MANAGER
MR. CARLOS VENTURA SANTAMANS	GENERAL MANAGER
MS. VIRGINIA ZAFRA DE LLERA	GENERAL MANAGER
MS. NÚRIA LÁZARO RUBIO	ASSISTANT GENERAL MANAGER - HEAD OF INTERNAL AUDIT

Number of female senior executives	3
% of total senior executives	25
Total remuneration of senior management (in thousand)	8,625

C.1.15. Indicate whether there were any amendments to the board regulation in the year:

- ☒ **Yes**
☐ **No**

C.1.21. Detail whether there are specific requirements, other than those relating to directors, for appointing the Chairman of the Board of Directors:

- ☒ **Yes**
☐ **No**

C.1.23. Indicate if the articles or board regulation establish a term limit for independent directors or other requirements for them that are stricter than those provided by law, other than those provided in the regulations:

- ☐ Yes
☒ No

C.1.25. Indicate the number of board of directors meetings held in the year. Also, state the number of times that the Chairman did not attend Board meetings. Proxies granted with specific instructions are not counted as absences.

Number of Board meetings	23
Number of Board meetings held without the chairman	0

Indicate the number of meetings held by the lead director with the other directors, without any executive director being present:

Number of meetings	2

Indicate the number of meetings held by board committees in the year:

Number of meetings of the Strategy and Sustainability Committee	14
Number of meetings of the Credit Delegated Committee	38
Number of meetings of the Audit and Control Committee	13
Number of meetings of the Appointments and Corporate Governance Committee	16
Number of meetings of the Remuneration Committee	11
Number of meetings of the Risk Committee	16

C.1.26. Indicate the number of board of directors meetings held in the year, and give data on attendance by members:

Meetings which were attended in person by at least 80 % of directors	23
Attendance in person as a % of the total number of votes during the year	95.77
Meetings at which all the directors were present in person or for which they granted proxy with specific instructions	23
Votes cast with all directors actually present or having granted proxy with specific instructions, as a % of total votes in the year	100.00

C.1.27. Indicate whether the separate and consolidated financial statements that are presented for board approval are certified beforehand:

- ☒ Yes
☐ No

Identify the person(s) that certified the company's separate and consolidated financial statements for board authorisation:

Name	Position
MR. CÉSAR GONZÁLEZ-BUENO MAYER WITTGENSTEIN	CHIEF EXECUTIVE OFFICER
MR. SERGIO ALEJANDRO PALAVECINO TOMÉ	GENERAL MANAGER—CHIEF FINANCIAL OFFICER

C.1.29. Is the board secretary a director?

- ☐ Yes
☒ No

If the secretary is not a director, complete the following table:

Name of secretary	Representative
MR. MIQUEL ROCA I JUNYENT	

C.1.31. State whether the Company changed its external auditor during the year. If so, identify the incoming and outgoing auditor:

- ☐ Yes
☒ No

If there was a disagreement with the outgoing auditor, describe it:

- ☐ Yes
☒ No

C.1.32. Indicate whether the audit firm performs work for the company and/or its group other than auditing and, if so, state the fees received for such work and those fees as a percentage of the total fees billed to the company and/or its group:

- ☒ Yes
☐ No

	Company	Group companies	Total
Fees for work other than auditing (thousand euro)	786	118	904
Fees for work other than auditing / Total audit fees (%)	25.59%	1.61%	8.67%

C.1.33. State whether or not the auditors' report on the previous year's financial statements was qualified. If it was, state the reasons given by the Chairperson of the Audit Committee to the shareholders at the General Meeting of Shareholders to explain the content and scope of the qualification or exception.

- ☐ Yes
☒ No

C.1.34. Indicate the number of consecutive years that the current audit firm has been auditing the financial statements of the company and/or the consolidated financial statements of its group. Also, indicate the number of years audited by the current audit firm as a percentage of the total number of years in which the financial statements have been audited:

	Separate	Consolidated
Number of consecutive years	6	6

	Separate	Consolidated
No. of years audited by the current audit firm / No. of years that the company or its group has been audited (%)	13.33	14.63

C.1.35. State and detail any procedures in place to ensure that directors can obtain the information they need to prepare in good time for meetings of the governing bodies:

- ☒ **Yes**
☐ **No**

Detail the procedure
The Bank has procedures for providing the directors with the necessary information and material to prepare for meetings of the Board of Directors and its committees in a timely manner. Article 21.1 of the Board of Directors Regulation establishes that the notice of meeting shall always contain the Agenda, which must set out, among other points, the issues relating to reports from subsidiaries and Board Committees as well as any proposals and suggestions made by the Chairman and the other members of the Board and the General Manager(s) of the Bank, which must be presented at least five working days in advance of the date of the Board meeting; such proposals must be accompanied by the pertinent material for distribution to the directors. Additionally, article 25 provides that: 1. Directors are vested with the broadest powers to be informed about any aspect of the company, to examine its books, records, documents and other background information on the company's transactions and to inspect all of its installations. The right to information extends to subsidiaries, both domestic and foreign. 2. So as not to disturb the ordinary running of the company, the exercise of the powers of information shall be channelled through the Chairman or the Secretary to the Board, who shall attend to the director's requests by giving the information directly, providing appropriate access to individuals at the relevant level of the organization, or providing the means by which the director may carry out the desired formal examination and inspection on site. Banco Sabadell has a procedure for providing the directors with the necessary material to prepare for meetings of the Board of Directors and its committees in a confidential and encrypted way, using the Diligent Boards software running on iPads. Information for Board meetings is circulated to the directors one week in advance, and it is elaborated upon or updated in the boardbook as needed; hence, they are duly informed.

C.1.39 Identify and detail, individually, in the case of directors, and in overall terms, in other cases, any agreements between the company and its directors and senior executives or employees that contain indemnities, guarantees or severance clauses in the event of their resignation or unfair dismissal or if the contractual relationship is terminated due to a takeover bid or other transaction.

Number of beneficiaries	42
Type of beneficiary	Description of agreement
CEO, CRO AND 40 EXECUTIVES	The Chief Executive Officer's contract contains a post-contractual non-competition clause of two years' duration providing two years' fixed remuneration, including the portion of annual contributions to pension plans that are not classified as discretionary pension benefits, in the event of the Chief Executive Officer's termination due to (i) a decision by the Bank, without this being due to a breach of the Chief Executive Officer's duties, or (ii) a change of control; and a non-competition clause of one year's fixed remuneration and one year's duration for all other cases. The application of this non-competition clause is limited geographically to Spain, the United Kingdom and Mexico, where the Bank's main activity is concentrated. The CRO's contract contains a post-contractual non-competition clause with a duration of two years, applicable at most up to the first date of ordinary retirement, providing for two years' fixed remuneration. The 2025 Director Remuneration Report, available on the website www.grupobancosabadell.com under "Corporate Governance and Remuneration Policy", contains more details of the executive directors' contracts. There are 29 executives whose contracts contain a clause providing indemnity, in addition to that provided by law, in the amount of up to two years' fixed remuneration for cases of unfair dismissal and some limited cases of change of control. Seven other executives have a post-contractual non-competition clause with a duration of two years, lasting at most until the first date of ordinary retirement, that provide the amount of two years' fixed remuneration, and the contracts of four executives contain a clause providing indemnity, in addition to that provided by law, up to one year's fixed remuneration in the event of unfair dismissal and a post-contractual non-competition clause for a maximum of one year until the first date of ordinary retirement that provides the amount of one year's fixed remuneration.

State whether, outside the cases provided for in the regulations, such contracts must be reported and/or approved by the decision-making bodies of the company or group. If so, specify the procedures, cases and nature of the parties responsible for approving or disclosing:

	Board of Directors	General Meeting of Shareholders
Body that authorises the clauses	X	
	YES	NO
Is the General Meeting informed of the clauses?	X	

C.2. BOARD COMMITTEES

C.2.1 List all the committees of the Board of Directors, their members and the proportion of executive, proprietary, independent and other external directors that comprise them:

Strategy and Sustainability Committee		
Name	Position	Category
Josep Oliu Creus	Chairman	Other external
Lluís Deulofeu Fuguet	Member	Independent
Pedro Fontana García	Member	Independent
María José García Beato	Member	Other external
César González-Bueno Mayer	Member	Executive
George Donald Johnston III	Member	Independent

% executive directors	16.67
% proprietary directors	0.00
% independent directors	50.00
% other external directors	33.33

Credit Delegated Committee		
Name	Position	Category
Pedro Fontana García	Chairman	Independent
Lluís Deulofeu Fuguet	Member	Independent
Mireya Giné Torrens	Member	Independent
César González-Bueno Mayer	Member	Executive
Pedro Viñolas Serra	Member	Independent

% executive directors	20.00
% proprietary directors	0.00
% independent directors	80.00
% other external directors	0.00

Audit and Control Committee		
Name	Position	Category
Manuel Valls Morató	Chairman	Independent
Ana Colonques García-Planas	Member	Independent
María Gloria Hernández García	Member	Independent
Margarita Salvans Puigbò	Member	Independent

% executive directors	0.00
% proprietary directors	0.00
% independent directors	100.00
% other external directors	0.00

Identify the directors who are members of the audit committee and have been appointed taking into account their knowledge and experience in accounting or audit matters, or both, and state the date on which the Chairman of this committee was appointed.

Names of directors with experience	MR. MANUEL VALLS MORATÓ / MS. ANA COLONQUES GARCÍA-PLANAS / MS. MARÍA GLORIA HERNÁNDEZ GARCÍA / MS. MARGARITA SALVANS PUIGBÒ
Date of appointment of the Chairman	30/06/2023

Appointments and Corporate Governance Committee		
Name	Position	Category
Pedro Fontana García	Chairman	Independent
Aurora Catá Sala	Member	Independent
Ana Colonques García-Planas	Member	Independent
María José García Beato	Member	Other external
Pedro Viñolas Serra	Member	Independent

% executive directors	0.00
% proprietary directors	0.00
% independent directors	80.00
% other external directors	20.00

Remuneration Committee		
Name	Position	Category
Mireya Giné Torrens	Chairman	Independent
Ana Colonques García-Planas	Member	Independent
Margarita Salvans Puigbò	Member	Independent

% executive directors	0.00
% proprietary directors	0.00
% independent directors	100.00
% other external directors	0.00

Risk Committee		
Name	Position	Category
George Donald Johnston III	Chairman	Independent
Aurora Catá Sala	Member	Independent
María Gloria Hernández García	Member	Independent
Manuel Valls Morató	Member	Independent

% executive directors	0.00
% proprietary directors	0.00
% independent directors	100.00
% other external directors	0.00

C.2.2 Complete the following table with information on the number of female directors on the committees of the Board of Directors at the end of the last four financial years:

	2025		2024		2023		2022	
	Number	%	Number	%	Number	%	Number	%
Strategy and Sustainability Committee	1	16.67*	1	16.67*	1	16.67*	1	16.67*
Credit Delegated Committee	1	20.00	1	20.00	1	20.00	2	40.00
Audit and Control Committee	3	75.00	2	50.00	1	25.00	2	50.00
Appointments and Corporate Governance Committee	3	60.00	3	75.00	3	75.00	2	50.00
Remuneration Committee	3	100.00	3	100.00	2	66.67	2	50.00
Risk Committee	2	50.00	2	50.00	2	50.00	2	50.00

* 20 % in the area of Sustainability

D. RELATED-PARTY AND INTERCOMPANY TRANSACTIONS

D.2 Give details of any transactions that are material, because of their size or nature, between the company or its subsidiaries and shareholders holding 10 % or more of the voting rights or represented on the board of directors of the company, indicating the competent body for their approval and whether any shareholder or director who was affected abstained. Where competency in this matter lies with the general meeting, indicate whether the motion was approved by the board without a majority of the independent directors voting against:

Name of shareholder or any of its dependent companies	Participation (%)	Name of the company or subsidiary	Amount (thousand euro)	Approving body	Identification of the significant shareholder or director who has abstained	The proposal to the General Meeting, if any, was approved by the Board without the majority of independents voting against
No data.						

Name of shareholder or any of its dependent companies	Nature of relationship	Type of transaction and other information required to assess it
No data.		

D.3 Give itemised details of any transactions that are material, because of their size or nature, between the company or any dependent company and the company's directors or executives, including transactions with undertakings that the director or executive controls or jointly controls, indicating the competent body for their approval and whether any of the shareholders or directors involved abstained. Where competency in this matter lies with the general meeting, indicate whether the motion was approved by the board without a majority of the independent directors voting against:

Name of the directors or their controlled or jointly controlled entities	Name of the company or subsidiary	Relationship	Amount (thousand euro)	Approving body	Identification of the significant shareholder or director who has abstained	The proposal to the General Meeting, if any, was approved by the Board without the majority of independents voting against
No data.						

Name of the directors or their controlled or jointly controlled entities	Type of transaction and other information required to assess it
No data.	

D.4 Give itemised details of any intercompany transactions that are material, because of their size or nature, between the company and its controlling company or with other companies in the controlling company's group, including the listed company's own dependent companies, unless no other related party of the listed company has an interest in such subsidiaries or such subsidiaries are wholly owned, directly or indirectly, by the listed company.

In any event, provide details of any intercompany transactions carried out with organisations based in countries or territories that are considered to be tax havens:

Name of the group institution	Brief description of transaction and other information that is necessary to assess it	Amount (thousand euro)
No data.		

D.5 Give itemised details of any transactions that are material because of their amount or are significant because of their nature between the company or any group undertakings and other related parties as defined in the International Financial Reporting Standards adopted by the EU that have not been disclosed in the preceding sections.

Name of related party	Brief description of transaction and other information that is necessary to assess it	Amount (thousand euro)
No data		

G. DEGREE OF COMPLIANCE WITH CORPORATE GOVERNANCE RECOMMENDATIONS

Indicate the degree of compliance by the company with the recommendations of the Good Governance Code for Listed Companies.

If any recommendation is not followed or is followed only in part, give a detailed explanation of the reasons so that shareholders, investors and the market in general have sufficient information to be able to evaluate the company's course of action. Explanations of a general nature will not be sufficient.

1. That the articles of incorporation of listed companies should not limit the maximum number of votes that may be cast by one shareholder or contain other restrictions that hinder the takeover of control of the company through the acquisition of its shares on the market.

Complies ☒ Explain ☐

2. That when the listed company is controlled by another entity, whether listed or not, in the meaning of Article 42 of the Commercial Code and has, directly or through its subsidiaries, business relations with said entity or any of its subsidiaries (other than the listed company) or carries out activities related to those of any of them it should make accurate public disclosures on:

- a. The respective areas of activity and possible business relationships between the listed company or its subsidiaries and the parent company or its subsidiaries.
- b. The mechanisms in place to resolve any conflicts of interest that may arise.

Complies ☐ Complies partially ☐ Explain ☐ Not applicable ☒

3. That, during the Ordinary General Meeting, as a complement to the distribution of the written annual corporate governance report, the Chairman of the Board of Directors should inform shareholders orally, in sufficient detail, of the most significant aspects of the company's corporate governance, and in particular:

- a. Any changes since the last ordinary general meeting.
- b. The specific reasons for which the company does not follow any of the recommendations of the Code of Corporate Governance and any alternative rules that are applicable in this matter.

Complies ☒ Complies partially ☐ Explain ☐

4. That the company should define and promote a policy on communication and contact with shareholders and institutional investors, within the framework of their involvement in the company, and with proxy advisors that complies in all aspects with rules against market abuse and gives equal treatment to similarly situated shareholders. And that the company should publish this policy on its website, including information on how it has been put into practice and identifying the contact persons or those responsible for implementing it.

And that, without prejudice to the legal obligations regarding dissemination of inside information and other types of regulated information, the company should also have a general policy regarding the communication of economic-financial, non-financial and corporate information through such channels as it may consider appropriate (communication media, social networks or other channels) that helps to maximise the dissemination and quality of information available to the market, investors and other stakeholders.

Complies ☒ Complies partially ☐ Explain ☐

5. That the Board of Directors should not submit to the General Meeting any proposal for delegation of powers allowing the issue of shares or convertible securities with the exclusion of pre-emptive rights in an amount exceeding 20 % of the capital at the time of delegation.

And that whenever the Board of Directors approves any issue of shares or convertible securities with the exclusion of pre-emptive rights, the company should immediately publish the reports referred to by company law on its website.

Complies ☒ **Complies partially** ☐ **Explain** ☐

6. That listed companies that prepare the reports listed below, whether under a legal obligation or voluntarily, should publish them on their website with sufficient time before the Ordinary General Meeting, even if their publication is not mandatory:

- a. Report on the auditor's independence.
- b. Reports on the performance of the Audit Committee and the Appointments and Remuneration Committees.
- c. Report by the Audit Committee on related-party transactions.

Complies ☒ **Complies partially** ☐ **Explain** ☐

7. That the company should transmit in real time, through its website, the proceedings of the General Meeting of Shareholders.

And that the company should have mechanisms in place allowing the delegation and casting of votes by means of data transmission and even, in the case of companies of large capitalisation and to the extent that it is proportionate, attendance and active participation in the General Meeting to be conducted by such remote means.

Complies ☒ **Complies partially** ☐ **Explain** ☐

8. That the audit committee should ensure that the annual accounts that the Board of Directors submits to the General Meeting of Shareholders are prepared in accordance with the accounting regulations. And that in cases in which the auditor has included a qualification or reservation in its audit report, the Chairman of the audit committee should clearly explain to the general meeting the opinion of the audit committee on its content and scope, making a summary of this opinion available to shareholders at the time when the meeting is called, alongside the other Board proposals and reports.

Complies ☒ **Complies partially** ☐ **Explain** ☐

9. That the company should permanently publish on its website the requirements and procedures for certification of share ownership, the right of attendance at the General Meeting of Shareholders, and the exercise of voting or issuing a proxy.

And that such requirements and procedures promote attendance and the exercise of shareholder rights in a non-discriminatory fashion.

Complies ☒ **Complies partially** ☐ **Explain** ☐

10. That when a duly authenticated shareholder has exercised his or her right to complete the agenda or to make motions in advance of the General Meeting of Shareholders, the company:

- a. Should immediately distribute such complementary items and new motions.

- b. Should publish the attendance, proxy and remote voting card specimen with the necessary changes such that the new agenda items and alternative motions can be voted on in the same terms as those proposed by the Board of Directors.
- c. Should submit all these items or alternative proposals to a vote and apply the same voting rules to them as to those formulated by the Board of Directors including, in particular, assumptions or deduction regarding votes for or against.
- d. That after the General Meeting of Shareholders, a breakdown of the voting on said additional items or alternative proposals be communicated.

Complies ☒ **Complies partially** ☐ **Explain** ☐ **Not applicable** ☐

11. That if the company intends to pay premiums for attending the General Meeting of Shareholders, it should establish in advance a general policy on such premiums and this policy should be stable.

Complies ☐ **Complies partially** ☐ **Explain** ☐ **Not applicable** ☒

12. That the Board of Directors should perform its functions with a unity of purpose and independence of criterion, treating all similarly situated shareholders equally and being guided by the best interests of the company, which is understood to mean the pursuit of a profitable and sustainable business in the long term, promoting its continuity and maximising the economic value of the business.

And that in pursuit of the company's interest, in addition to complying with applicable law and rules and conducting itself on the basis of good faith, ethics and a respect for commonly accepted best practices, it should seek to reconcile its own company interests, when appropriate, with the interests of its employees, suppliers, clients and other stakeholders that may be affected, as well as the impact of its corporate activities on the communities in which it operates and on the environment.

Complies ☒ **Complies partially** ☐ **Explain** ☐

13. That the Board of Directors should be of an appropriate size to perform its duties effectively and in a collegial manner, which makes it advisable for it to have between five and fifteen members.

Complies ☒ **Explain** ☐

14. That the Board of Directors should approve a policy aimed at favouring an appropriate composition of the Board of Directors and that:

- a. Is concrete and verifiable.
- b. Ensures that proposals as to the appointment or re-election are based upon a prior analysis of the skills required by the Board of Directors; and
- c. Favours knowledge, experience, age and gender diversity. For these purposes, it is considered that the measures that encourage the company to have a significant number of female senior executives favour gender diversity.

That the result of the prior analysis of the skills required by the Board of Directors be contained in the supporting report from the appointments committee published upon calling the General Meeting of Shareholders to which the ratification, appointment or re-election of each director is submitted.

The appointments committee will verify compliance with this policy each year and detail its findings in the annual corporate governance report.

Complies ☒ **Complies partially** ☐ **Explain** ☐

15. That proprietary and independent directors should constitute a substantial majority of the Board of Directors and that the number of executive directors be kept to a minimum, taking into account the complexity of the corporate group and the percentage of equity holding of executive directors.

And that the number of female directors should represent at least 40 % of the members of the Board of Directors before the end of 2022 and thereafter, and no less than 30 % prior to that date.

Complies ☒ **Complies partially** ☐ **Explain** ☐

16. That the number of proprietary directors as a percentage of the total number of non-executive directors are not greater than the proportion of the company's share capital represented by those directors and the rest of the capital.

This criterion may be relaxed:

- a. In large cap companies where few equity stakes attain the legal threshold for classification as significant shareholdings.
- b. In the case of companies where a plurality of shareholders is represented on the Board of Directors without ties among them.

Complies ☒ **Explain** ☐

17. That the number of independent directors should represent at least half of the total number of directors.

That, however, when the company does not have a high level of market capitalisation or in the event that it is a large-cap company with one shareholder or a group of shareholders acting in concert who together control more than 30 % of the company's share capital, the number of independent directors should represent at least one third of the total number of directors.

Complies ☒ **Explain** ☐

18. That companies should publish the following information on its directors on their website, and keep it up to date:

- a. Professional and biographical profile.
- b. Any other Boards of Directors to which the directors belong, regardless of whether or not they are listed companies, as well as any other remunerated activities engaged in, regardless of type.
- c. Category of directorship, indicating, in the case of proprietary directors, the shareholder that they represent or to which they are connected.
- d. Date of their first appointment as a member of the company's Board of Directors, and any subsequent reelections.
- e. Company shares and share options that they own.

Complies ☒ **Complies partially** ☐ **Explain** ☐

19. That the annual corporate governance report, after verification by the appointments committee, should explain the reasons for the appointment of any proprietary directors at the proposal of shareholders whose holding is less than 3 %. It should also explain, if applicable, why formal requests from shareholders for presence on the Board were not honoured, when their shareholding was equal to or exceeded that of other shareholders whose proposal for proprietary directors was honoured.

Complies ☐ **Complies partially** ☐ **Explain** ☐ **Not applicable** ☒

20. That proprietary directors representing significant shareholders should resign from the Board when the shareholder they represent disposes of its entire holding. They should also resign, in a proportional fashion, in the event that said shareholder reduces its holding to a level that requires a decrease in the number of proprietary directors.

Complies ☐ **Complies partially** ☐ **Explain** ☐ **Not applicable** ☒

21. That the Board of Directors should not propose the dismissal of any independent director before the completion of the director's term provided for in the articles of incorporation unless the Board of Directors finds just cause and a prior report has been prepared by the appointments committee. Specifically, just cause is considered to exist if the director takes on new duties or commits to new obligations that would interfere with his or her ability to dedicate the time necessary for attention to the duties inherent to his or her post as a director, fails to complete the tasks inherent to his or her post, or is affected by any of the circumstances which would cause the loss of independent status in accordance with applicable law.

The dismissal of independent directors may also be proposed as a result of a public offering, merger or other similar corporate operations entailing a change in the shareholder structure of the company, provided that such changes in the structure of the Board of Directors are the result of application of the proportionate representation criterion provided in Recommendation 16.

Complies ☒ **Explain** ☐

22. That companies should establish rules requiring that directors inform the Board of Directors and, where appropriate, resign from their posts, when circumstances arise which affect them, whether or not related to their actions in the company itself, and which may harm the company's standing and reputation, and in particular requiring them to inform the Board of Directors of any criminal proceedings in which they appear as suspects or defendants, as well as of how the legal proceedings subsequently unfold.

And that, if the Board is informed or becomes aware in any other manner of any of the circumstances mentioned above, it must investigate the case as quickly as possible and, depending on the specific circumstances, decide, based on a report from the Appointments and Remuneration Committee, whether or not any measure must be adopted, such as the opening of an internal investigation, asking the director to resign or proposing that he or she be dismissed. And that these events must be reported in the annual corporate governance report, unless there are any special reasons not to do so, which must also be noted in the minutes. This without prejudice to the information that the company must disseminate, if appropriate, at the time when the corresponding measures are implemented.

Complies ☒ **Complies partially** ☐ **Explain** ☐

23. That all directors clearly express their opposition when they consider any proposal submitted to the Board of Directors to be against the company's interests. In particular, independent directors and other directors not subject to potential conflicts of interest should challenge any decision that might harm the interests of shareholders lacking board representation.

Furthermore, when the Board of Directors makes significant or repeated decisions about which the director has serious reservations, the director should draw the appropriate conclusions and, in the event the director decides to resign, explain the reasons for this decision in the letter referred to in the next recommendation.

This recommendation also applies to the secretary of the Board of Directors, even if he or she is not a director.

Complies ☐ **Complies partially** ☐ **Explain** ☐ **Not applicable** ☒

24. That whenever, due to resignation or resolution of the General Meeting, a director leaves before the completion of his or her term of office, the director should explain the reasons for this decision, or in the case of non-executive directors, their opinion of the reasons for cessation, in a letter addressed to all members of the Board of Directors.

Y que, sin perjuicio de que se dé cuenta de todo ello en el informe anual de gobierno corporativo, en la medida en que sea relevante para los inversores, la sociedad publique a la mayor brevedad posible el cese incluyendo referencia suficiente a los motivos o circunstancias aportados por el consejero.

Complies ☒ **Complies partially** ☐ **Explain** ☐ **Not applicable** ☐

25. That the appointments committee should make sure that non-executive directors have sufficient time available in order to properly perform their duties.

And that the Board regulations establish the maximum number of company Boards on which directors may sit.

Complies ☒ **Complies partially** ☐ **Explain** ☐

26. That the Board of Directors meet frequently enough to be able to effectively perform its duties, and at least eight times per year, following a schedule of dates and agendas established at the beginning of the year and allowing each director individually to propose other items that do not originally appear on the agenda.

Complies ☒ **Complies partially** ☐ **Explain** ☐

27. That director absences occur only when absolutely necessary and be quantified in the annual corporate governance report. And when absences do occur, that the director appoint a representative with instructions.

Complies ☒ **Complies partially** ☐ **Explain** ☐

28. That when directors or the secretary express concern regarding a proposal or, in the case of directors, regarding the direction in which the company is headed and said concerns are not resolved by the Board of Directors, such concerns should be included in the minutes at the request of the director expressing them.

Complies ☐ **Complies partially** ☐ **Explain** ☐ **Not applicable** ☒

29. That the company should establish adequate means for directors to obtain appropriate advice in order to properly fulfil their duties including, should circumstances warrant, external advice at the company's expense.

Complies ☒ **Complies partially** ☐ **Explain** ☐

30. That, without regard to the knowledge necessary for directors to complete their duties, companies make refresher courses available to them when circumstances make this advisable.

Complies ☒ **Complies partially** ☐ **Explain** ☐

31. That the agenda for meetings should clearly indicate those items on which the Board of Directors is to make a decision or adopt a resolution so that the directors may study or gather all relevant information ahead of time.

When, in exceptional circumstances, the Chairman wishes to bring urgent matters for decision or resolution before the Board of Directors which do not appear on the agenda, prior express agreement of a majority of the directors shall be necessary, and said consent shall be duly recorded in the minutes.

Complies ☒ **Complies partially** ☐ **Explain** ☐

32. That directors be periodically informed of changes in shareholding and of the opinions of significant shareholders, investors and rating agencies of the company and its group.

Complies ☒ **Complies partially** ☐ **Explain** ☐

33. That the Chairman, as the person responsible for the efficient workings of the Board of Directors, in addition to carrying out the duties assigned by law and the articles of incorporation, should prepare and submit to the Board of Directors a schedule of dates and matters to be considered; organise and coordinate the periodic evaluation of the Board as well as, if applicable, the chief executive of the company, should be responsible for leading the Board and the effectiveness of its work; ensuring that sufficient time is devoted to considering strategic issues, and approve and supervise refresher courses for each director when circumstances make this advisable.

Complies ☒ **Complies partially** ☐ **Explain** ☐

34. That when there is a lead director, the articles of incorporation or Regulations of the Board of Directors should confer upon him or her the following powers in addition to those conferred by law: to chair the Board of Directors in the absence of the Chairman and deputy Chairmen, should there be any; to reflect the concerns of non-executive directors; to liaise with investors and shareholders in order to understand their points of view and respond to their concerns, in particular as those concerns relate to corporate governance of the company; and to coordinate a succession plan for the Chairman.

Complies ☒ **Complies partially** ☐ **Explain** ☐ **Not applicable** ☐

35. That the secretary of the Board of Directors should pay special attention to ensure that the activities and decisions of the Board of Directors take into account such recommendations regarding good governance contained in this Good Governance Code as may be applicable to the company.

Complies ☒ **Explain** ☐

36. That the Board of Directors meet in plenary session once a year and adopt, where appropriate, an action plan to correct any deficiencies detected in the following:

- a. The quality and efficiency of the Board of Directors' work.
- b. The workings and composition of its committees.
- c. Diversity in the composition and skills of the Board of Directors.
- d. Performance of the Chairman of the Board of Directors and of the chief executive officer of the company.
- e. Performance and input of each director, paying special attention to those in charge of the various Board committees.

In order to perform its evaluation of the various committees, the Board of Directors will take a report from the committees themselves as a starting point and for the evaluation of the Board, a report from the appointments committee.

Every three years, the Board of Directors will rely for its evaluation upon the assistance of an external advisor, whose independence shall be verified by the appointments committee.

Business relationships between the external adviser or any member of the adviser's group and the company or any company within its group must be specified in the annual corporate governance report.

The process and the areas evaluated must be described in the annual corporate governance report.

Complies ☒ **Complies partially** ☐ **Explain** ☐

37. If there is an executive committee, it should contain at least two non-executive directors, at least one of whom must be independent, and its secretary should be the secretary of the board of directors.

Complies ☐ **Complies partially** ☐ **Explain** ☐ **Not applicable** ☒

38. That the Board of Directors must always be aware of the matters discussed and decisions taken by the executive committee and that all members of the Board of Directors receive a copy of the minutes of meetings of the executive committee.

Complies ☐ **Complies partially** ☐ **Explain** ☐ **Not applicable** ☒

39. That the members of the audit committee, in particular its Chairman, be appointed in consideration of their knowledge and experience in accounting, audit and risk management issues, both financial and non-financial.

Complies ☒ **Complies partially** ☐ **Explain** ☐

40. That under the supervision of the audit committee, there should be a unit in charge of the internal audit function, which ensures that information and internal control systems operate correctly, and which reports to the non-executive Chairman of the Board or of the audit committee.

Complies ☒ **Complies partially** ☐ **Explain** ☐

41. That the person in charge of the unit performing the internal audit function should present an annual work plan to the audit committee, for approval by that committee or by the Board, reporting directly on its execution, including any incidents or limitations of scope, the results and monitoring of its recommendations, and present an activity report at the end of each year.

Complies ☒ **Complies partially** ☐ **Explain** ☐ **Not applicable** ☐

42. That in addition to the provisions of applicable law, the audit committee should be responsible for the following:

1. With regard to information systems and internal control:

- a. Supervising and evaluating the process of preparation and the completeness of the financial and non- financial information, as well as the control and management systems for financial and non-financial risk relating to the company and, if applicable, the group - including operational, technological, legal, social, environmental, political and reputational risk, or risk related to corruption - reviewing compliance with regulatory requirements, the appropriate delimitation of the scope of consolidation and the correct application of accounting criteria.
- b. Ensuring the independence of the unit charged with the internal audit function; proposing the selection, appointment and dismissal of the head of internal audit unit; proposing the budget for this service; approving or proposing its orientation and annual work plans for approval by the Board, making sure that its activity is focused primarily on material risks (including reputational risk); receiving periodic information on its activities; and verifying that Bank's senior management takes into account the conclusions and recommendations of its reports.
- c. Establish and supervise a mechanism to enable employees and other persons connected with the company, such as directors, shareholders, suppliers, contractors or subcontractors, to report potentially significant irregularities, including financial and accounting irregularities, or of any other nature, related to the company that they notice within the company or its group. This mechanism must guarantee confidentiality and, in any case, provide for cases in which the communications can be made anonymously, respecting the rights of the whistleblower and the person reported.
- d. Generally ensuring that internal control policies and systems are effectively applied in practice.

2. With regard to the external auditor:

- a. In the event that the external auditor resigns, examining the circumstances leading to such resignation.
- b. Ensuring that the remuneration paid to the external auditor for its work does not compromise the quality of the work or the auditor's independence.
- c. Making sure that the company informs the CNMV of the change of auditor, along with a statement on any differences that arose with the outgoing auditor and, if applicable, the contents thereof.
- d. Ensuring that the external auditor holds an annual meeting with the Board of Directors in plenary session in order to make a report regarding the tasks performed and the development of the company's accounting situation and risks.
- e. Ensuring that the company and the external auditor comply with applicable rules regarding the provision of services other than auditing, limits on the concentration of the auditor's business, and, in general, all other rules regarding auditors' independence.

Complies ☒ **Complies partially** ☐ **Explain** ☐

43. That the audit committee be able to require the presence of any employee or manager of the company, even stipulating that he or she appears without the presence of any other member of management.

Complies ☒ **Complies partially** ☐ **Explain** ☐

44. The audit committee should be informed of any transactions that the company is planning that entail structural or corporate changes, so that the committee can analyse them and advise the board beforehand on the economic conditions and accounting impact and, when applicable, the proposed exchange ratio.

Complies ☒ **Complies partially** ☐ **Explain** ☐ **Not applicable** ☐

45. That the risk management and control policy identify or determine, as a minimum:

- a. The various types of financial and non-financial risks (including operational, technological, legal, social, environmental, political and reputational risks and risks relating to corruption) which the company faces, including among the financial or economic risks contingent liabilities and other off-balance sheet risks.
- b. A risk control and management model based on different levels, which will include a specialised risk committee when sector regulations so require or the company considers it to be appropriate.
- c. The level of risk that the company considers to be acceptable.
- d. Measures in place to mitigate the impact of the risks identified in the event that they should materialise.
- e. Internal control and information systems to be used in order to control and manage the aforementioned risks, including contingent liabilities.

Complies ☒ **Complies partially** ☐ **Explain** ☐

46. Companies should establish a risk control and management function and assign it to one of the company's internal department or units, reporting directly to the audit committee or another specialised board committee. This function should be expressly charged with the following responsibilities:

- a. Ensuring the proper functioning of risk management and control systems and, in particular, that they adequately identify, manage and quantify all material risks affecting the company.
- b. Actively participating in drawing up the risk strategy and in important decisions regarding risk management.
- c. Ensuring that the risk management and control systems adequately mitigate risks as defined by the policy laid down by the Board of Directors.

Complies ☒ **Complies partially** ☐ **Explain** ☐

47. That in designating the members of the appointment and remuneration committee — or of the appointments committee and the remuneration committee if they are separate — care be taken to ensure that they have the knowledge, aptitudes and experience appropriate to the functions that they are called upon to perform and that the majority of said members are independent directors.

Complies ☒ **Complies partially** ☐ **Explain** ☐

48. That large-cap companies have separate Appointments and Remuneration Committees.

Complies ☒ **Complies partially** ☐ **Explain** ☐

49. That the appointments committee consult the Chairman of the Board of Directors and the chief executive of the company, especially in relation to matters concerning executive directors.

And that any director be able to ask the appointments committee to consider potential candidates that he or she considers suitable to fill a vacancy on the Board of Directors.

Complies ☒ **Complies partially** ☐ **Explain** ☐

50. That the remuneration committee exercise its functions independently and that, in addition to the functions assigned to it by law, it should be responsible for the following:

- a. Proposing the basic conditions of employment for senior executive to the Board of Directors.
- b. Monitoring compliance with the remuneration policy set by the company.
- c. Periodically reviewing the remuneration policy applied to directors and senior executives, including share- based remuneration systems and their application, as well as ensuring that their individual remuneration is proportional to that received by the company's other directors and senior executives.
- d. Ensuring that potential conflicts of interest do not impair the independence of external advice given to the committee.
- e. Verifying the information on remuneration of directors and senior executives contained in the various corporate documents, including the annual report on directors' remuneration.

Complies ☒ **Complies partially** ☐ **Explain** ☐

51. That the remuneration committee should consult the Chairman and the chief executive of the company, especially on matters relating to executive directors and senior executives.

Complies ☒ **Complies partially** ☐ **Explain** ☐

52. That the rules regarding the composition and workings of the supervision and control committees should appear in the Regulations of the Board of Directors and that they should be consistent with those applying to legally mandatory committees in accordance with the foregoing recommendations, including:

- a. That they be composed exclusively of non-executive directors, with a majority of independent directors.
- b. That their chairpersons be independent directors.
- c. That the Board of Directors select members of these committees taking into account their knowledge, skills and experience and the duties of each committee; discuss their proposals and reports; and require them to render account of their activities and of the work performed in the first plenary session of the Board of Directors held after each committee meeting.
- d. That the committees be allowed to avail themselves of outside advice when they consider it necessary to perform their duties.
- e. That their meetings be recorded and the minutes be made available to all directors.

Complies ☒ **Complies partially** ☐ **Explain** ☐ **Not applicable** ☐

53. That verification of compliance with the company's policies and rules on environmental, social and corporate governance matters, and with the internal codes of conduct be assigned to one or divided among more than one committee of the Board of Directors, which may be the audit committee, the appointments committee, a specialised committee on sustainability or corporate social responsibility or such other specialised committee as the Board of Directors, in the exercise of its powers of self-organisation, may have decided to create. And that such committee be composed exclusively of non-executive directors, with a majority of these being independent directors, and that the minimum functions indicated in the next recommendation be specifically assigned to it.

Complies ☒

Complies partially ☐

Explain ☐

54. The minimum functions referred to in the foregoing recommendation are the following:

- a. Monitoring of compliance with the company's internal codes of conduct and corporate governance rules, also ensuring that the corporate culture is aligned with its purpose and values.
- b. Monitoring the application of the general policy on communication of economic and financial information, non-financial and corporate information, and communication with shareholders and investors, proxy advisors and other stakeholders. The manner in which the entity communicates and handles relations with small and medium-sized shareholders must also be monitored.
- c. The periodic evaluation and review of the company's corporate governance system, and environmental and social policy, with a view to ensuring that they fulfil their purposes of promoting the interests of society and take account, as appropriate, of the legitimate interests of other stakeholders.
- d. Supervision of the company's environmental and social practices to ensure they are in alignment with the established strategy and policy.
- e. Supervision and evaluation of the way in which relations with the various stakeholders are handled.

Complies ☒

Complies partially ☐

Explain ☐

55. That environmental and social sustainability policies identify and include at least the following:

- a. The principles, commitments, objectives and strategy relating to shareholders, employees, clients, suppliers, social issues, the environment, diversity, tax responsibility, respect for human rights, and the prevention of corruption and other unlawful conduct
- b. Means or systems for monitoring compliance with these policies, their associated risks, and management.
- c. Mechanisms for supervising non-financial risk, including that relating to ethical aspects and aspects of business conduct.
- d. Channels of communication, participation and dialogue with stakeholders.
- e. Responsible communication practices that impede the manipulation of data and protect integrity and honour.

Complies ☒

Complies partially ☐

Explain ☐

56. That director remuneration be sufficient in order to attract and retain directors who meet the desired professional profile and to adequately compensate them for the dedication, qualifications and responsibility demanded of their posts, while not being so excessive as to compromise the independent judgement of non-executive directors.

Complies ☒

Explain ☐

57. That only executive directors should receive variable remuneration linked to corporate results and personal performance, as well as remuneration in the form of shares, options or rights to shares, or instruments referenced to the share price and long-term savings plans such as pension plans, retirement schemes or other provident schemes.

Consideration may be given to delivering shares to non-executive directors as remuneration providing this is conditional upon their holding them until they cease to be directors. The foregoing shall not apply to shares that the director may need to sell in order to meet the costs related to their acquisition.

Complies ☒ **Complies partially** ☐ **Explain** ☐

58. That as regards variable remuneration, remuneration policies should incorporate the necessary limits and technical safeguards to ensure that such remuneration is in line with the professional performance of its beneficiaries and not based solely on general developments in the markets or in the sector in which the company operates, or other similar circumstances.

And, in particular, that variable remuneration components:

- a. Are linked to pre-determined and measurable performance criteria and that such criteria take into account the risk incurred to achieve a given result.
- b. Promote the sustainability of the company and include non-financial criteria that are geared towards creating long term value, such as compliance with the company's rules and internal operating procedures and with its risk management and control policies.
- c. Are based on balancing the attainment of short-, medium- and long-term objectives, so as to allow remuneration of continuous performance over a period long enough to be able to assess its contribution to the sustainable creation of value, such that the elements used to measure performance are not associated only with one-off, occasional or extraordinary events.

Complies ☒ **Complies partially** ☐ **Explain** ☐ **Not applicable** ☐

59. That the payment of variable remuneration components be subject to sufficient verification that previously established performance or other conditions have effectively been met. Entities must include in their annual report on director remuneration the criteria for the time required and methods used for this verification depending on the nature and characteristics of each variable component.

That, additionally, companies consider the inclusion of a reduction ('malus') clause for the deferral of the payment of a portion of variable remuneration components that would imply their total or partial loss if an event were to occur prior to the payment date that would make this advisable.

Complies ☒ **Complies partially** ☐ **Explain** ☐ **Not applicable** ☐

60. That remuneration related to company results should take into account any reservations that might appear in the external auditor's report and that would diminish said results.

Complies ☒ **Complies partially** ☐ **Explain** ☐ **Not applicable** ☐

61. That a material portion of executive directors' variable remuneration be linked to the delivery of shares or financial instruments referenced to the share price.

Complies ☒ **Complies partially** ☐ **Explain** ☐ **Not applicable** ☐

62. That once shares or options or financial instruments have been allocated under remuneration systems, executive directors be prohibited from transferring ownership or exercising options or rights until a term of at least three years has elapsed.

An exception is made in cases where the director has, at the time of the transfer or exercise of options or rights, a net economic exposure to changes in the share price for a market value equivalent to at least twice the amount of his or her fixed annual remuneration through the ownership of shares, options or other financial instruments.

The foregoing shall not apply to shares that the director may need to sell in order to meet the costs related to their acquisition or, following a favourable assessment by the Appointments and Remuneration Committee, to deal with such extraordinary situations as may arise and so require.

Complies ☒ **Complies partially** ☐ **Explain** ☐ **Not applicable** ☐

63. That contractual arrangements should include a clause allowing the company to demand repayment of the variable remuneration components in the event that payment was not in accordance with the performance conditions or when payment was made based on data subsequently shown to have been inaccurate.

Complies ☒ **Complies partially** ☐ **Explain** ☐ **Not applicable** ☐

64. That payments for contract resolution should not exceed an amount equivalent to two years of total annual remuneration and should not be paid until the company has been able to verify that the director has fulfilled all previously established criteria or conditions for payment.

For the purposes of this recommendation, payments for contractual resolution will be considered to include any payments the accrual of which or the obligation to pay which arises as a consequence of or on the occasion of the termination of the contractual relationship between the director and the company, including amounts not previously vested of long-term savings schemes and amounts paid by virtue of post- contractual non-competition agreements.

Complies ☒ **Complies partially** ☐ **Explain** ☐ **Not applicable** ☐

Indicate whether any board members voted against or abstained with respect to the approval of this report.

☐ Yes
☒ No

I declare that the details include in this statistical schedule coincide and are consistent with the descriptions and details included in the annual corporate governance report published by the Company.



Banco de Sabadell, S.A.

**Auditor's Report on the “Internal Control over
Financial Reporting (ICOFR) Information” of
Banco de Sabadell, S.A. for 2025**

*(Translation from the original in Spanish. In the event of
discrepancy, the Spanish-language version prevails.)*



KPMG Auditores, S.L.
Torre Realia
Plaça d'Europa, 41-43
08908 L'Hospitalet de Llobregat
(Barcelona)

Auditor's Report on the “Internal Control over Financial Reporting (ICOFR) Information” of Banco de Sabadell, S.A. for 2025

(Translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

To the directors of Banco de Sabadell, S.A.

As requested by the Board of Directors of Banco de Sabadell, S.A. (the “Entity”) and in accordance with our proposal letter dated 21 January 2026, we have applied certain procedures to the “ICOFR information” attached hereto in section F of the Annual Corporate Governance Report (ACGR) of Banco de Sabadell, S.A. for 2025, which summarises the Entity's internal control procedures for annual financial reporting.

The Board of Directors is responsible for adopting appropriate measures to reasonably ensure the implementation, maintenance and oversight of an adequate system of internal control, the development of improvements to that system and the preparation and definition of the content of the ICOFR information attached hereto.

In this respect, it should be borne in mind that irrespective of the quality of the design and operation of the internal control system adopted by the Entity in relation to annual financial reporting, the system may only provide reasonable, but not absolute assurance in relation to the objectives pursued, due to the limitations inherent in any internal control system.

In the course of our audit work on the annual accounts and in accordance with Technical Auditing Standards, our evaluation of the Entity's internal control was solely aimed at enabling us to establish the scope, nature and timing of the audit procedures on the Entity's annual accounts. Consequently, the scope of our evaluation of internal control, performed for the purposes of the audit of accounts, was not sufficient to enable us to issue a specific opinion on the effectiveness of this internal control over regulated annual financial reporting.

For the purposes of issuing this report, we have applied only the specific procedures described below and set out in the Guidelines for preparing the auditor's report on the information concerning the system of Internal Control over Financial Reporting in Listed Companies, published on the website of the Spanish National Securities Market Commission (CNMV), which define the work to be performed, the minimum scope thereof and the content of this report. As the scope of the work resulting from these procedures is in any event limited and substantially less than that of an audit or review of the internal control system, we do not express an opinion on the effectiveness thereof, nor on its design or operating effectiveness, with respect to the Entity's annual financial reporting for 2025 described in the ICOFR information attached hereto. Consequently, had additional procedures been applied other than those established in the aforementioned Guidelines, or had an audit or a review been performed of the internal control system in relation to regulated annual financial reporting, other events or matters could have been identified, which would have been reported to you.

(Translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

As this special work did not constitute an audit of accounts and is not subject to current legislation regulating the audit of accounts in Spain, we do not express an audit opinion under the terms provided in such legislation.

The procedures applied were as follows:

1. Reading and understanding of the information prepared by the entity regarding ICOFR – disclosures included in the directors' report – and an evaluation of whether this information meets all the minimum reporting requirements, taking into account the minimum content described in section F, regarding the description of ICOFR, of the ACGR template provided in Spanish National Securities Market Commission (CNMV) Circular 5/2013 of 12 June 2013 and subsequent amendments, the most recent of these being CNMV Circular 3/2021 of 28 September 2021 (hereinafter the CNMV Circulars).
2. Inquiries of the personnel responsible for drawing up the information detailed in point 1 above in order to: (i) obtain an understanding of the preparation process; (ii) obtain information that allows us to assess whether the terminology used conforms to the definitions contained in the reference framework; (iii) obtain information on whether the control procedures described are in place and operational in the entity.
3. Review of the explanatory documentation supporting the information detailed in point 1 above, primarily including documents made directly available to those responsible for preparing the description of the ICOFR system. This documentation includes reports prepared by internal audit, senior management and other internal or external specialists supporting the Audit and Control Committee.
4. Comparison of the information detailed in point 1 above with the understanding of the entity's ICOFR obtained as a result of the procedures performed within the framework of the audit work on the annual accounts.
5. Reading of the minutes taken at meetings of the board of directors, Audit and Control Committee and other committees of the entity for the purpose of assessing the consistency of the matters discussed at those meetings in relation to ICOFR with the information detailed in point 1 above.
6. Procurement of a representation letter concerning the work performed, duly signed by those responsible for preparing and authorising the information detailed in point 1 above.

As a result of the procedures applied to the ICOFR information, no inconsistencies or incidents have been detected that could affect it.

This report has been prepared exclusively within the context of the requirements laid down in article 540 of the Revised Spanish Companies Act and in the CNMV Circulars for the purposes of the description of ICOFR in annual corporate governance reports.

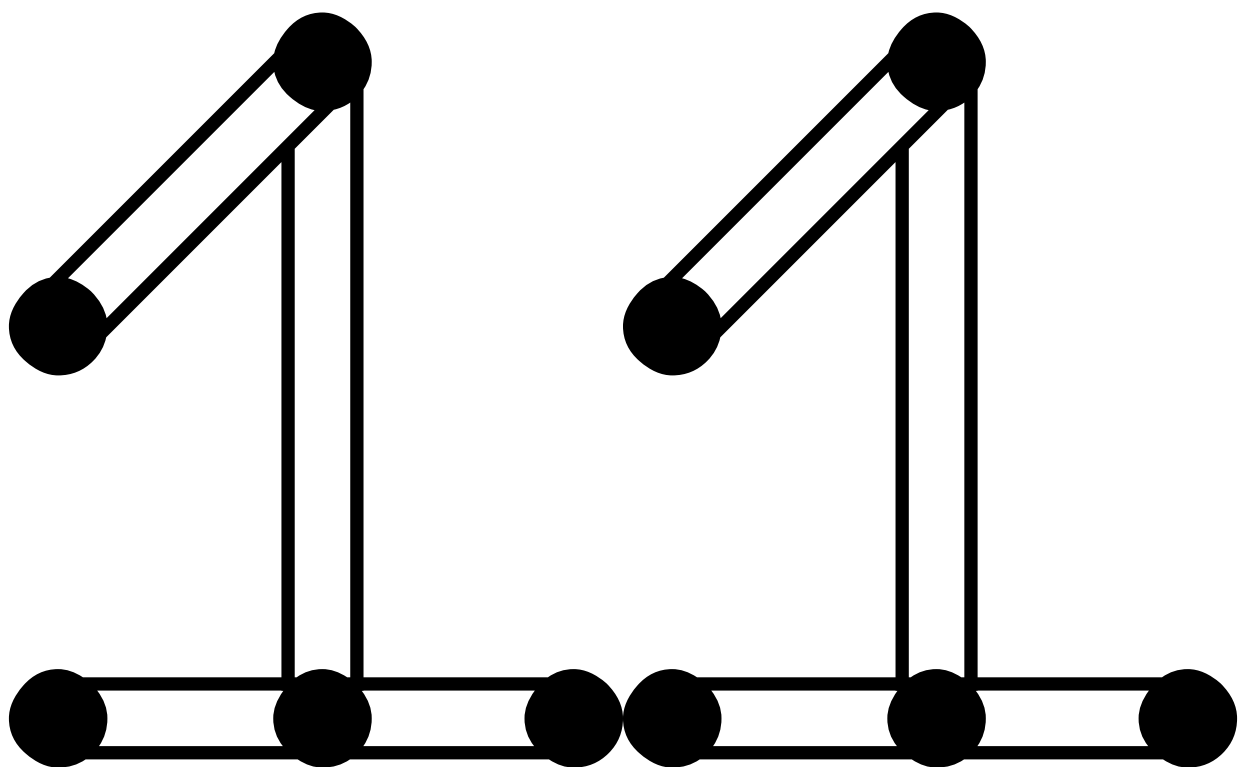
KPMG Auditores, S.L.

(Signed on original in Spanish)

Dídac Feliubadaló
Partner

20 February 2026

Annual Report on Director Remuneration



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Annual Report on Director Remuneration

This is the Annual Report on Director Remuneration of Banco de Sabadell, S.A. (hereinafter Banco Sabadell, the Institution or the Bank).

The Banco Sabadell Annual Report on Director Remuneration (the Report) is drawn up with the information from the Bank at 2025 year-end in compliance with the provisions of article 541 of Legislative Royal Decree 1/2010, of 2 July, approving the consolidated text of the Capital Companies Law (LSC), and Circular 4/2013, of 12 June, of the Spanish National Securities Market Commission (CNMV).

This Report, together with the statistical annex in [Section 7](#), was submitted as a regulatory disclosure to the CNMV and will be submitted for a consultative vote as a separate item on the agenda at the Bank's forthcoming Ordinary General Meeting of Shareholders, to be held in 2026. This Report is also available in the "Corporate Governance and Remuneration Policy" section of the Banco Sabadell Group corporate website (www.grupobancsabadell.com).

The Director Remuneration Policy for 2024, 2025 and 2026, approved by the General Meeting of Shareholders on 23 March 2023 for a three-year term, is applicable until 2026.

This Report includes a summary of the new Director Remuneration Policy that has been applicable since the date of its approval, and describes how it was applied during 2025.

For more details, consult the Director Remuneration Policy at the following link: <https://www.grupobancsabadell.com/corp/es/gobierno-corporativo-y-politica-deremuneraciones/politica-de-remuneraciones-de-consejeros.html>

Accordingly, in 2026 it is necessary to draw up and approve the remuneration policy, which will be presented for approval at the next General Meeting of Shareholders of Banco de Sabadell.

In compliance with the provisions of Article 541 of the Capital Companies Law, this report, approved by the Board of Directors at a meeting on 19 February 2026, will be submitted to a consultative vote by the shareholders at the 2026 General Meeting of Shareholders as a separate item on the agenda.

As disclosed in a communication of Other Relevant Information to the CNMV dated 5 February 2026, the Board of Directors, at a meeting on 5 February 2026, approved, by mutual agreement with Mr. César González-Bueno, his replacement as Chief Executive Officer of Banco Sabadell and accepted his resignation as a director of the Bank, effective at the next General Meeting of Shareholders. The Board of Directors also approved the appointment of Mr. Marc Armengol Dulcet as an executive director with the status of chief executive officer to fill the vacancy left by the resignation of Mr. César González-Bueno. The resignation and appointment will take effect at the end of the bank's next Ordinary General Meeting of Shareholders, provided that the European Central Bank has issued a fit and proper assessment of Mr. Marc Armengol Dulcet by that date. If it is received after

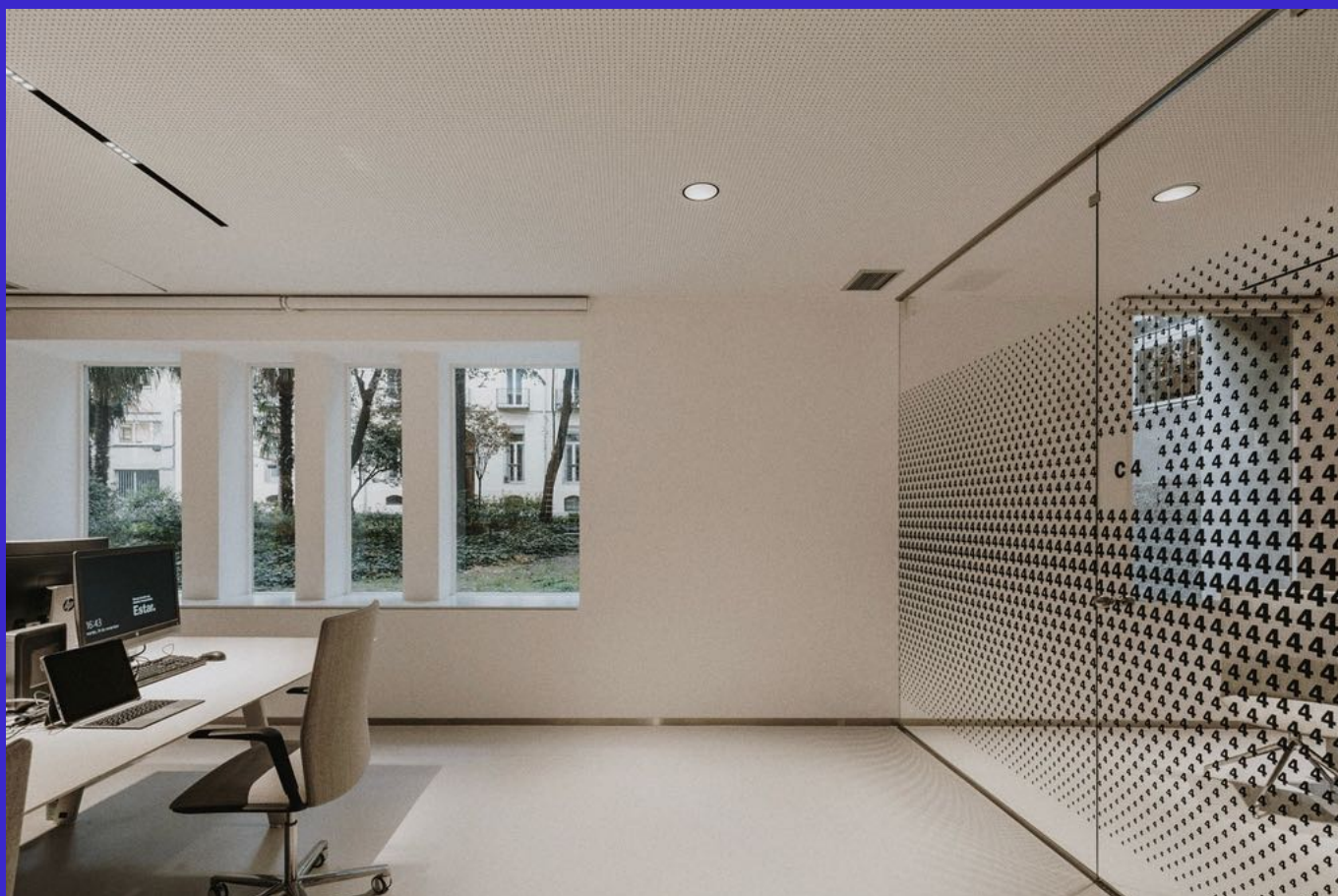
that meeting, the handover will take effect on the date on which that fit and proper clearance is received.

Furthermore, at the aforementioned meeting on 5 February 2026, the Board of Directors approved the appointment of Mr. Carlos Ventura Santamans as an executive director, to take charge of the business in Spain, including Corporate Banking, Retail Banking, Private Banking and the branch network.

The new Director Remuneration Policy for 2027, 2028 and 2028 will reflect the changes to remuneration arising from the changes in the composition of the Board of Directors.

This Report was prepared in accordance with best market practices and corporate governance recommendations, and is worded in clear, comprehensive and straightforward terms in the interests of transparency, providing comprehensive information on the application of the remuneration policy.





www.grupbancsabadell.com

>Corporate Governance and
Remuneration Policy

>Director Remuneration Policy

1. Banco Sabadell Director Remuneration Policy 2024, 2025 and 2026

1.1. General Principles of the Banco Sabadell Remuneration Policy

The Banco Sabadell Remuneration Policy is focused on creating long-term value by aligning the interests of its shareholders and employees, and it is coherent with the strategic goals in terms of risks and the business, and with the Bank's values, all under a prudent risk management approach while avoiding conflicts of interest.

In accordance with the general principles of the Banco Sabadell Group Remuneration Policy, the principles upon which the Director Remuneration Policy is based are as follows:

1 Promoting medium- and long-term sustainability and alignment with the Group's values

- Alignment of the remuneration with the interests of the shareholders and with long-term value creation
- Promotion of rigorous risk management, with measures to avoid conflicts of interest
- Alignment with the Group's long-term business strategy, objectives, values and interests.

The Banco Sabadell Group's Remuneration Policy as a whole contains information on the degree to which it is coherent with integrating sustainability risks. In particular, the following aspects are considered in connection with sustainability:

- The Group's Remuneration Policy and practices are in keeping with its credit risk management approach and with its appetite and strategies in relation to this risk, and do not create any conflicts of interest. These practices also include measures to manage conflicts of interest so as to protect consumers from any undesirable adverse effects.
- The Remuneration Policy and practices integrate sustainability risks by publishing information in this respect on the Group website.
- The Remuneration Policy and practices stimulate behaviour that is coherent with the Group's approach to risk in relation to climate and the environment, as well as the commitments made voluntarily by the Group. The Remuneration Policy and practices promote a long-term approach to the management of climate-related and environmental risks.
- The components of remuneration should contribute to driving action in environmental, social and governance (ESG) matters in order to make the business strategy sustainable and socially responsible.
- Banco Sabadell maintains its commitment to sustainability by contributing to promoting action in environmental, social and governance (ESG) matters.



The synthetic sustainability indicator (ISos) incorporates KPIs (Key Performance Indicators) for ESG matters and links them to the short-term variable compensation of executive directors and employees with variable remuneration; those KPIs form part of the group objectives with a weighting of 10%. Additionally, to reinforce the alignment of executive directors' remuneration with the Group's commitment to sustainability, a synthetic sustainability indicator is defined in the multi-year objectives set by the Group. That indicator is directly linked to long-term remuneration, with a weighting of 20%.

2 Ensuring a competitive, equitable remuneration system (external competitiveness and internal fairness), based on equal pay for male and female employees for the same job or for work of equal value

- Able to attract and retain the best talent.
- Rewarding professional track record and responsibility, regardless of the employee's gender.
- Aligned with market standards, while providing flexibility to adapt to changes in the situation and in the demands of the sector.

In terms of equal pay, the Remuneration Policy is gender-neutral and aligns with the principle of equal pay for the same work or for work of equal value. The Remuneration Policy also guides decision-making to avoid any gender pay gap and guarantees equal opportunities, a prerequisite for achieving gender-neutral remuneration in the long term.

3 Reward performance by aligning remuneration with results generated by the individual without encouraging risk-taking beyond the level tolerated by the Group, which entails:

- An appropriate balance between the various remuneration components.
- Consideration of current and future risks and results, without incentivizing the assumption of risks that exceed the level tolerated by the Group.
- A system that is simple, transparent and clear. The Remuneration Policy must be understandable and easy to communicate to the entire workforce.

The Remuneration Policy is gender neutral, in line with the principle of equal pay for equal work or work of equal value.



Principles applicable to the members of the Board of Directors

Principles of the Remuneration Policy applicable to Executive Directors

A reasonable balance between fixed and variable components (annual and multi-year) to favour appropriate risk-taking combined with the attainment of defined short- and long-term objectives.

- Consideration of multiple metrics linked to results, returns, risk management and control, solvency, capital, and strategic non-financial objectives linked to sustainability.
- Short-term remuneration, with an annual measurement period for the Group's objectives using financial indicators (profitability, results, revenue and efficiency) and non-financial metrics related to service quality, competitive position and sustainability.
- Long-term remuneration with a three-year objective measurement period linked to TSR, value creation, ROTE and sustainability objectives and subject to a risk-related correction factor that is a function of fulfilment of capital and liquidity indicators.
- Variable remuneration is not guaranteed.
- Prudential mechanisms for adjusting the attainment of objectives and other ex-ante adjustments.
- Deferral over five years of 60% of the annual variable remuneration for any variable remuneration element.
- Payment of more than 50% of the variable remuneration in shares (50% of the up-front part, and 55% of both the deferred part of annual variable remuneration and of the long-term remuneration).
- Share lock-up. Executive directors may not dispose of shares they receive until at least three years have elapsed since receipt unless they own shares worth twice their annual fixed remuneration; the shares must be held for at least one year in any event.
- Malus and clawback clauses, in accordance with the provisions of the regulations governing credit institutions.
- Regular external advice to the Board of Directors and the Remuneration Committee with regard to market practices.

Principles of the Remuneration Policy applicable to the Directors for their functions as members of the Board of Directors

The remuneration is commensurate with the responsibilities and functions assumed by each director without jeopardising their independence.

- They do not qualify for variable remuneration.
- They are not remunerated in the form of shares, options or rights relating to shares or instruments linked to the value of the share.
- They do not benefit from long-term savings systems such as pension plans, retirement schemes or other similar arrangements.

The policy also complies with the current European Directives and Regulations and other legislation, in particular Law 10/2014, of 26 June, on the regulation, supervision and solvency of credit institutions, Royal Decree 84/2015, of 13 February, implementing that Law, and Bank of Spain Circular 2/2016, of 2 February, to credit institutions, on supervision and capital adequacy, which completes the adaptation of Spanish law to Directive 2013/36/EU and Regulation (EU) 575/2013, as well as the EBA Guidelines on internal governance (EBA/GL/2021/05) of 2 July 2021, and EBA Guidelines EBA/GL/2021/04, of 2 July, on sound remuneration policies under Directive 2013/36/EU and Delegated Regulation (EU) 923/2021.



2. Application of the Director Remuneration Policy in 2025

The remuneration accrued in 2025 conformed to the terms of the Banco Sabadell Director Remuneration Policy for 2024, 2025 and 2026 approved by the General Meeting of Shareholders on 23 March 2023.

During 2025, Banco Sabadell's Board of Directors found itself dealing with exceptional circumstances, which required extraordinary dedication on the part of its members and led to numerous extraordinary Board meetings being held, as well as the preparation of special reports that current regulations do not allow to be delegated.

The Director Remuneration Policy, approved by the General Meeting of Shareholders, establishes that Board members receive attendance fees for a maximum of 11 ordinary meetings per year, with no provision for the payment of fees for extraordinary meetings. However, Article 7.4 of the Policy provides for the possibility of applying temporary exceptions in duly justified situations, provided that the circumstances so require and the established procedures are followed.

In this context, and at the proposal of the Remuneration Committee, the Board of Directors approved a temporary exception to the Remuneration Policy and authorised the payment of attendance fees for four of the extraordinary meetings held during 2025, linked to functions that cannot be delegated. The adoption of this exceptional measure is intended to recognise the additional dedication required of directors in a year marked by events of particular significance for the bank and its shareholders.

The Annual Report on Director Remuneration for 2024 was submitted to a consultative vote at the General Meeting of Shareholders on 20 March 2025:

The number of shares for which valid votes were cast was 3,786,534,408, distributed as follows:

Description	No. of votes	Shares represented	Shareholders	% votes cast
Votes in favour	3,078,187	3,079,223,323	91,427	81.320 %
Votes against	698,502	698,612,015	748	18.453 %
Abstentions	8,575	8,699,070	528	0.227 %

In recent years, Banco Sabadell shareholders have supported the remuneration proposals presented by the Board of Directors, at the initiative of the Remuneration Committee. At the General Meeting of Shareholders on 20 March 2025, the Annual Report on Director Remuneration for 2025 was approved by 81.32% of the votes cast.

2.1. Remuneration for Executive Directors

2.1.1. Details of the remuneration items

In addition to their remuneration for membership of the Board of Directors, executive directors are paid for performing executive functions, as provided in the Articles of Association of Banco Sabadell, under the same headings as members of Banco Sabadell Senior Management and the rest of the Identified Staff.

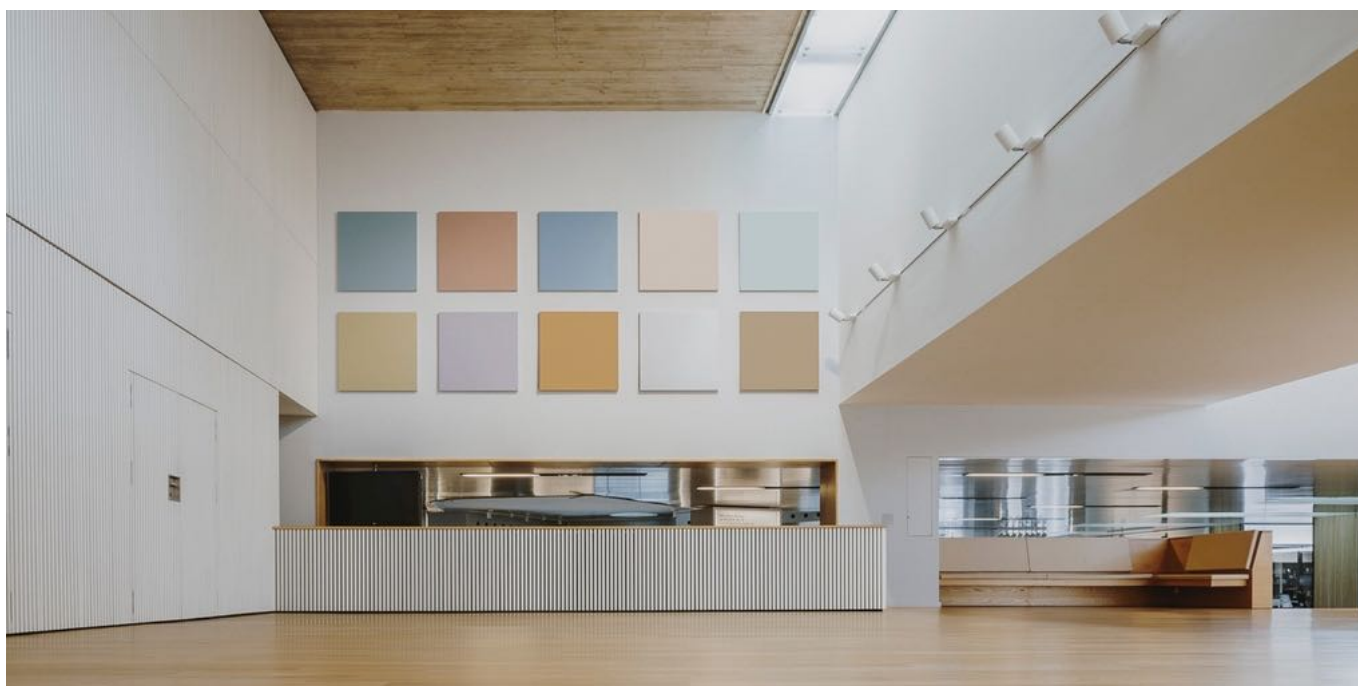
Executive director remuneration is set each year by the Board of Directors within the maximum overall amount established by the General Meeting of Shareholders by approving the Director Remuneration Policy for each remuneration item.

The Board of Directors will comply with the provisions of the applicable legal regulations, taking into account its special status as a financial institution and in accordance with the definitions, terms and conditions set out in the Director Remuneration Policy. The Remuneration Policy contemplates a vision of total remuneration, taking into account all elements of remuneration and the relationship between them, establishing an appropriate balance between fixed and variable remuneration, as well as between the distribution of short- and long-term remuneration, so as to safeguard the rights and interests of shareholders, investors and customers.

The CEO's remuneration mix (variable/fixed) was modified so that the variable proportion went from 91.6%, to 90.7%, (including discretionary pension benefits) and the proportion of remuneration at risk was set at 55%. The purpose of this ratio is to increase alignment of the CEO's remuneration with shareholders' interests, and with the values and long-term interests of the Banco Sabadell Group, while also linking his compensation more tightly to the risk and business strategy.

To determine the CEO's remuneration, a benchmarking analysis was carried out with the assistance of Willis Tower Watson, structured into two comparison groups: a peer group composed of 15 banks from Spain and other European countries (the international benchmark), and a peer group made up of 15 Spanish companies, most of them in the IBEX-35 (the domestic benchmark).

The CEO's total remuneration for 2025 is in the 71st percentile of the international peer group and the 75th percentile of the domestic peer group.



Companies used as benchmark

Banks in the international benchmark



Swedbank	Intesa San Paolo
Banco BPM	KBC Groep NV
Bankinter	Mediobanca
BBVA	Skandinaviska Enskilda Banken
BPER Banca	Standard Chartered Bank
Caixabank	Raiffeisen
Commerzbank AG	ABN Amro Group
Erste Group	

Companies in the domestic benchmark



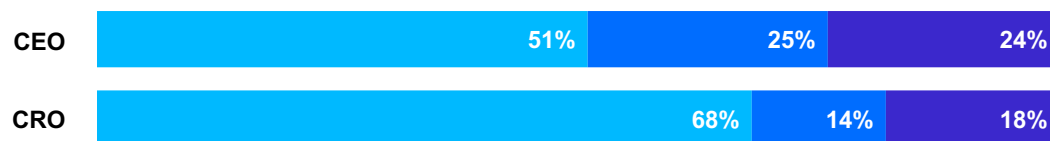
Abanca	Ferrovial
Acciona	Fluidra
Amadeus	Grifols
Bankinter	Mapfre
BBVA	Merlin Properties
Caixabank	Santander Spain
Enagás	Siemens Gamesa
Endesa	

Below is detailed the individual remuneration that made up the remuneration for 2025 for executive directors.

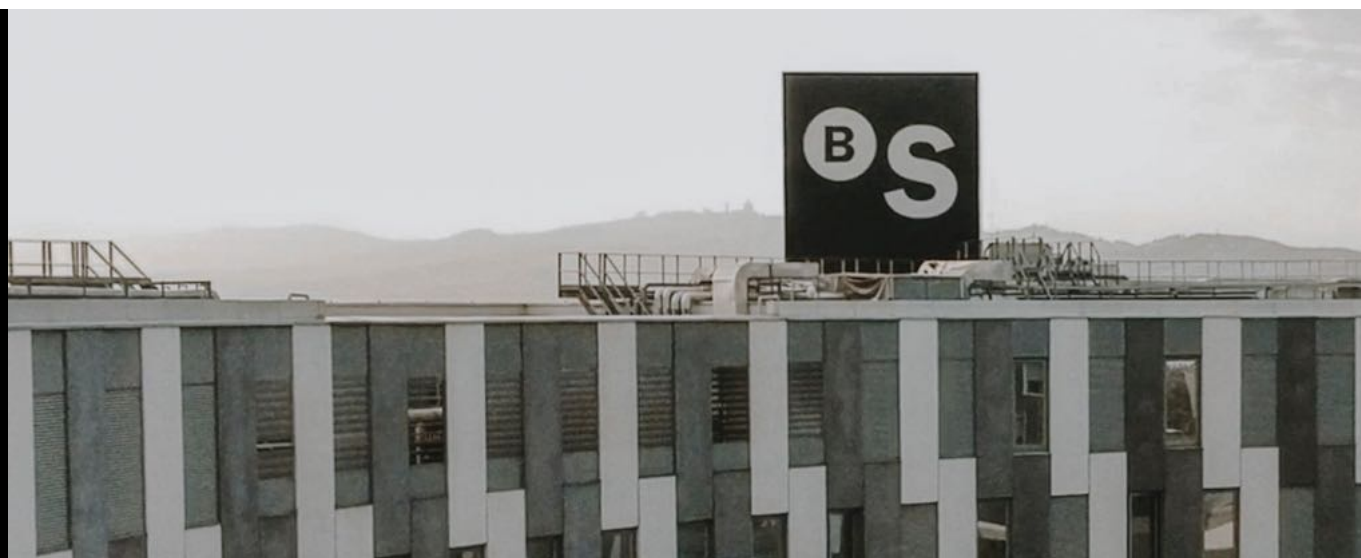
2025 remuneration (thousand euro)	CEO	CRO
Fixed salary	2,000	691
Benefits and remuneration in kind	36	36
Retirement and savings plans	301	132
Short-term variable remuneration	1,100	128
	✓ 109.98 %	✓ 121.75 %
Long-term remuneration	1,100	210
	✓ 109.98%	✓ 121.75%

✓ Percentage attainment of Group targets for 2025

Individual remuneration



- Fixed salary + benefits + pension benefits
- Short-term variable remuneration + discretionary pension benefits
- Long-term remuneration



A) Fixed remuneration

Fixed salary

- The fixed salary is intended to remunerate the executive director's functions and responsibilities and to recognize their contribution during their tenure.

Benefits and remuneration in kind

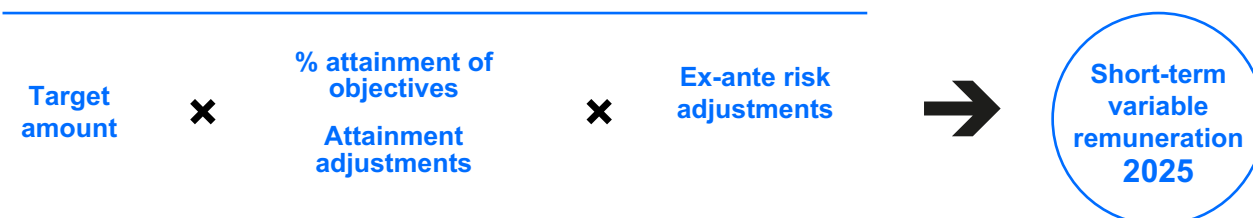
- Benefits and remuneration in kind: In 2025, the executive directors were beneficiaries of, inter alia, a group life insurance policy, school aid and Christmas hamper (as applicable to all the Bank's employees) and a medical insurance policy and risk coverage (also applicable to the Bank's management team), and they had the use of a vehicle on the same terms as the other members of Senior Management.

Contributions to retirement and savings plans

- The executive directors are beneficiaries of a defined contribution Group life insurance policy that pays out upon (i) the date of termination of the contract, in the case of the Chief Executive Officer, or on the date of effective retirement, in the case of the CRO, (ii) death or (iii) permanent and absolute disability.
- Of the amounts paid in their name, 85% is classified as fixed remuneration and the other 15% is classified as "discretionary pension benefits", which is treated as variable compensation in accordance with current regulations; it is linked to the percentage of attainment of the beneficiary's short-term objectives, and may not exceed 100% of the amount in any event.
- The reported amounts include contributions to other policies that cover the executive directors in the same way as the other employees. Specifically, the employer pension plan for Group B (defined contribution), which will pay out upon retirement as employees.

B) Short-term variable remuneration

The short-term variable remuneration in 2025 was as follows:

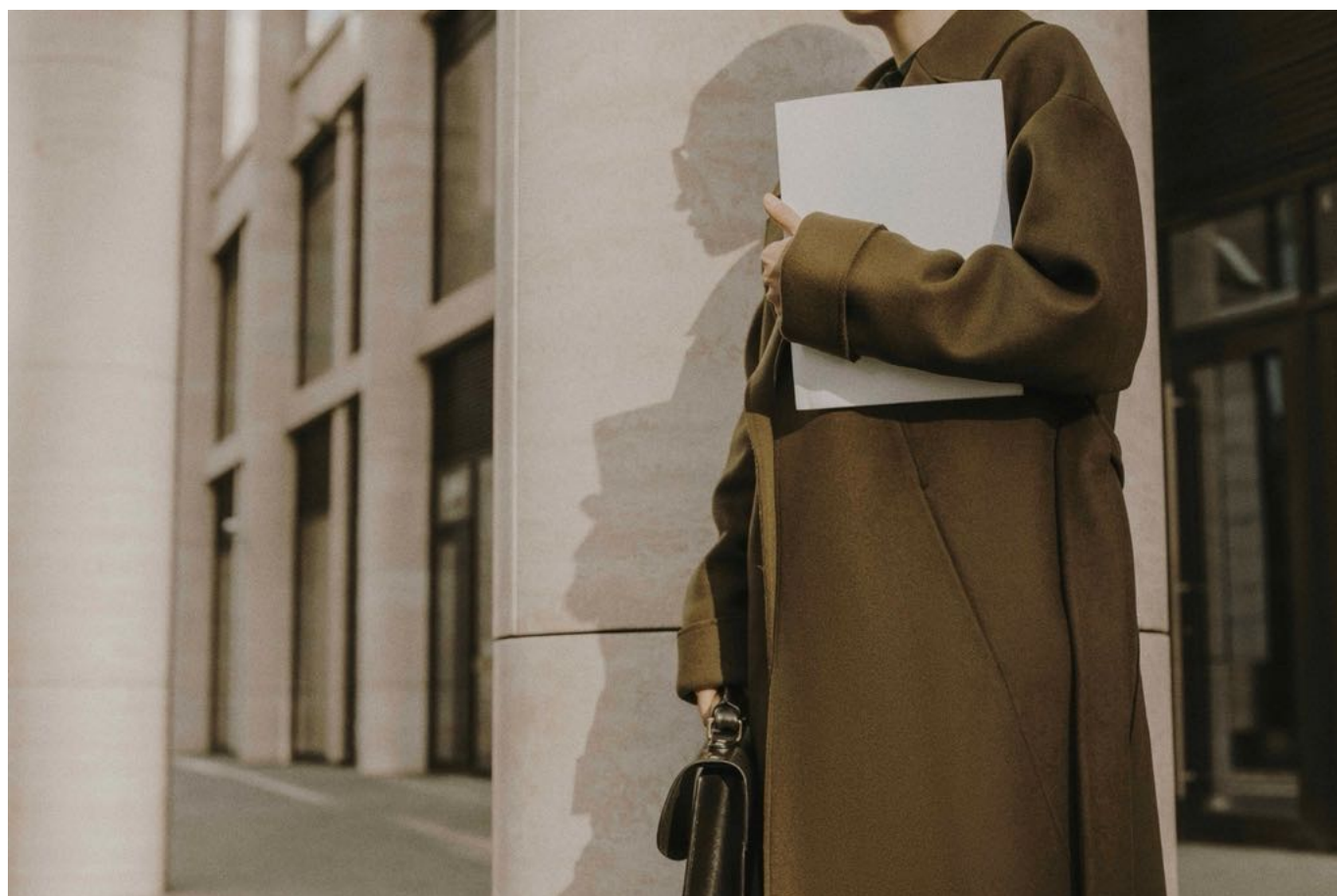


B.1.) Percentage attainment of Group targets for 2025

Assessment methods were established consisting of defining attainment parameters between 50% and 150% for each of the objectives, based on a non-linear scale of attainment established beforehand by the Remuneration Committee. Attainment of under 50% is considered as 0% for the purposes of counting general attainment. On 5 February 2026, the Board of Directors determined the degree of attainment of the Group objectives, applying the weightings established at the beginning of the year. The following tables summarise the Group's objectives for the 2025 financial year, the definition of these objectives and the levels of attainment.

Group objectives for 2025:

Metric	Weighting
Group net profit	10 %
ROTE	15 %
Net interest income plus net fees and commissions	15 %
Group expenses + Depreciation & amortization	10 %
Asset quality	15 %
Market share	10 %
Service quality	15 %
Sustainability	10 %



Definition of objectives:

Metric	Definition
Group net profit	Profit that is directly attributable to the parent company, calculated by deducting minority interests from profit for the year.
Return on Tangible Equity (ROTE)	Measures the return on the company's average tangible equity. Calculated by dividing profit attributable to the Group by average equity after deducting intangible assets and goodwill.
Net interest income + net fees and commissions	Reflects the revenues related most directly to the banking business, consisting of the Group's net interest income and net fees and commissions.
Group expenses + Depreciation & amortization	The sum of the Group's consolidated expenses, including personnel expenses, general expenses, depreciation and amortization and expenses derived from the real estate business that are not already included in the preceding categories.
Asset quality	Indicator composed of three metrics: the Cost of Risk, calculated as the sum of provisions for loan losses and other financial assets divided by the sum of gross loans and advances to customers, non-performing properties and guarantees, which provides information about losses per unit loan granted; the balance of Non-Performing Assets (NPAs), comprising the sum of Stage 3 assets and non-performing properties; and Total NPA Coverage, calculated as the ratio of provisions for non-performing assets to total non-performing assets.
Market share	A synthetic indicator focused on increasing profitability and business volume; it is composed of indicators of market share of loans and advances in Spain, market share of mortgages in the United Kingdom through subsidiary TSB, and market share of net fees and commissions with respect to credit institutions operating in Spain.
Service quality	A synthetic indicator that reflects the rating of quality of service by the Group's customers, distinguishing between commercial segments and relationship channels, weighted by the strategic focus of each segment (individuals, businesses, SMEs, private, corporate, branch, internet, mobile, etc.) and the employee satisfaction index.
Sustainability	A synthetic evaluation indicator made up of the following indicators: Green and sustainability-linked financing, diversity (% female executives), upgrades by the main rating agencies/ESG indices and Sustainable Finance Plan.

Attainment of 2025 objectives:

Metric	Threshold ⁽¹⁾	Maximum result ⁽²⁾	% Attainment
Group net profit	1.5 B€	2.0 B€	109.79 %
ROTE	11.8 %	15.6%	116.42 %
Net interest income + net fees and commissions	6.1 B€	6.6 B€	80.27 %
Group expenses + Depreciation & amortization	3.3 B€	3.2 B€	125.79 %
Asset quality	50.0 %	150.0 %	117.35 %
CoR	0.42 %	0.22 %	135.46 %
NPA volume	5.5 B€	5.1 B€	150.00 %
Total NPA coverage	59.2 %	63.2 %	66.58 %
Market share	50.0 %	150.0 %	59.00 %
Service quality	50.0 %	150.0 %	128.55 %
Sustainability	50.0 %	150.0 %	116.31 %
Total			107.48 %

(1) Threshold for attainment of the objective

(2) Maximum result, above which attainment is constant at 150%

The information used to calculate the financial indicators is derived from audited data in the financial statements using the definition that applied when they were first set.

The Banco Sabadell Group achieved €1,775 million in net profit in 2025 (-2.8% year-on-year). Excluding extraordinary items in 2024, net profit increased by 3.4% year-on-year, supported by improved asset quality and lower provisions, as well as strong growth in lending and funding volumes in Spain. As a result, the Group's RoTE rose to 14.3% and its fully loaded CET1 ratio rose to 13.65% (13.11% after considering the distribution of surplus capital), representing 196 basis points of organic growth during 2025.

The non-financial metrics are detailed below:

- **Market share: synthetic** indicator focused on increasing profitability and revenue, with a weighting of 10% in the Group's objectives, which groups the following parameters:

Definition	Weighting	Attainment
Lending to other resident sectors in Spain	50 %	65.0 %
Mortgages in the UK	20 %	50.0 %
Net fees and commissions in Spain	30 %	55.0 %
Total	100 %	59.0 %

- **Service quality:** a synthetic indicator that reflects the assessment of service quality, with a weighting of 15% in the Group's objectives, which groups the following variables:

Variable	Definition	Weighting	Attainment
Employee satisfaction	Outcome of annual employee satisfaction survey	33.3 %	150.00 %
	Sabadell Spain	46.7 %	118.70 %
	— NPS Individuals		
	— NPS Businesses		
	— NPS SMEs		
	— NPS Companies		
	— NPS Private Banking		
Customer satisfaction	TSB	13.3 %	99.00 %
	— Bank NPS		
	— Channel NPS (Mobile, Branch, Telephony, Internet banking and Conversational Banking)		
	— Banking complaint per thousand customers		
	Corporate & Investment Banking	6.7 %	150.00 %
	— NPS CIB EMEA		
Total		100 %	128.60 %

- **Sustainability indicator:** a synthetic indicator of sustainability that is weighted 10% in the Group's objectives and is composed of the following variables:

Variable	Definition	Weighting	Attainment
Rating agencies	Improve/maintain the score in the main ESG indices (MSCI, Sustainalytics, DJSI, ISS)	20 %	98.99 %
Sustainable Finance Plan	— Number of IRCA assessments performed — Accessibility project deployment — Fulfilment of the main indicators of Sabadell Sustainable Commitment — Fulfilment of established decarbonisation pathways	20 %	106.84 %
Diversity	% Female executives	20 %	85.75 %
Sustainable Business	— Sustainable finance — FvS finance	40 %	144.98 %
Total		100 %	116.31 %

This indicator is monitored periodically by the Sustainability Committee, and its metrics are updated as part of this review. Attainment of this metric in 2025 was 116.31%.



B.2.) Attainment of objectives by the CEO

Table of objectives		Attainment
80%	Group objective	107.48 %
20%	Valoración cualitativa individual	120.00 %
		Attainment in 2025
		109.98 %

The CEO had 80% of his objectives linked to the Group's objectives (detailed in [section B.1](#)) and the other 20% to an individual qualitative assessment adopted by the Remuneration Committee on the motion of the Chairman.

- The following were considered in his performance assessment:
- His leadership in executing management initiatives and priorities.
 - Representation of the Bank in other bodies and institutions.
 - Governance and stakeholder management.
- The CEO's performance was noteworthy due to achieving, once again, notable financial results and high returns:
- The bank continues to demonstrate its ability to generate profits and capital, and to offer attractive returns to shareholders on a sustainable basis. This was reflected in the share's appreciation by nearly 80% in 2025.
 - This financial performance is underpinned by strong commercial momentum, with significant revenue growth, rigorous cost management and an improved risk profile.
- The following were also considered in the performance assessment:
- The successful sale of TSB, the Group's UK subsidiary, to Banco Santander.
 - The design and launch of the Group's new Strategic Plan. The key strategic elements and financial targets for the period 2025–2027 were announced to the market at a Capital Markets Day.
 - Excellent management during the hostile takeover bid, which concluded in October after being rejected by a large majority of shareholders.

The individual qualitative assessment made by the Remuneration Committee, on a motion by the Chairman, was 120% — the highest possible level.



B.3.) Attainment of objectives by the CRO

Table of objectives		Attainment
25%	Group objective	107.48%
55%	Functional objectives	128.87%
20%	Individual qualitative assessment	120.00%
		Attainment in 2025
		121.75 %

(1) Objective measured through surveys completed by employees each year and by evaluating the change in the score compared to the previous year.

The CRO had 25% of his annual variable remuneration tied to Group objectives. The other 75% was indexed to individual objectives which, in turn, are composed of functional objectives and an individual qualitative assessment. These functional objectives are aligned with the oversight functions he performs, independent of the business and corporate areas, and are focused on the oversight and monitoring of transactions and of the risks that arise from such transactions, ensuring compliance with applicable laws, rules and regulations, and advising management on matters in his area of expertise.

The functional objectives set for the CRO for 2025 were assessed on the basis of the following parameters: Quantitative objectives included contributing to an improved SREP rating and management satisfaction. Qualitative objectives included the following: contribution to the proper operation of the Risk Committee; fulfilment of the second line of defence (2LoD) action plans, including the Risk Control, Validation and Compliance functions; deployment of the control framework for artificial intelligence models; the development and implementation of the annual regulatory model plan; and the proper delivery of the stress test exercise.

The individual qualitative assessment considered the following:

- His decisive contribution in a particularly demanding year, as well as his central role in the defence strategy, providing regulatory experience, judgement and credibility before authorities and supervisors.
- His ability to approach complex decisions calmly and balanced judgement, providing key advice at critical moments.
- The outstanding performance of his department, which maintained superior standards and whose leadership was recognised throughout the organisation.
- The added value provided by his presence on the Board as Chief Risk Officer, enhancing debates with a valuable technical and strategic vision.



The CRO attained 120% of his individual qualitative objectives for 2025. This indicator is capped at 120%.

The year-end evaluation of these objectives is the responsibility of the Risk Committee, which proposes the level of attainment and the degree of attainment achieved.

The percentage of attainment of objectives by both the CEO and the CRO were approved by the Board of Directors on 5 February 2026.

In order to qualify for variable remuneration, overall attainment of the objectives must exceed 60%. No variable remuneration is accrued under 60%, and no additional variable remuneration is accrued above 144%.



B.4.) Attainment adjustments

The Board of Directors did not consider it necessary to make any adjustments to the level of attainment of the objectives described above, since the Bank's capital (CET1 and MREL) and liquidity (Liquidity Coverage Ratio) fulfilled the limits established in the Risk Appetite Statement (RAS).

The Banco Sabadell Remuneration Committee analyzed the application of the Risk Correction Factor (RCF) to the Group's objectives at a meeting on 2 February 2026. In accordance with the capital and liquidity objectives, metrics, attainment scales and payment curves of the RCF approved by the Board of Directors on 28 January 2025, the Remuneration Committee determined that the thresholds required in the RAS to give entitlement to the entire variable remuneration that corresponds to the attainment of the Group's objectives in this regard had been attained.

In addition, there are prudential mechanisms for adjusting the CRO's individual attainment, based on exceedance of expected loss thresholds in terms of operational risk and/or internal control indicators. No factors arose such as to trigger an adjustment in the degree of attainment.

B.5.) Ex-ante risk adjustments

Based on information provided by the Internal Control Division, the Remuneration Committee decided not to propose any additional individual or collective ex-ante adjustment for 2025, insofar as:

- The Group and/or its subsidiary credit institutions attained the MDA (Maximum Distributable Amount) determined by current regulations.
- In accordance with the reports provided by the Compliance, Internal Audit, Finance and Internal Control Divisions, the short-term variable remuneration for 2025 is aligned with risk and control factors such as breaches of standards and regulations, exceedance of risk limits (e.g. RAS, solvency, liquidity, or breach of expected loss thresholds in terms of operational risk) and/or internal control indicators (e.g. results of internal audits) or similar items.



B.6.) Short-term variable remuneration accrued in 2025

Once the degree of attainment of the objectives at Group and individual level had been calculated, and it had been determined that no ex-ante adjustments were necessary, the variable remuneration to be assigned individually to each of the executive directors was determined. On the basis of each individual's assigned bonus target and attainment of individual objectives, the Board of Directors approved the variable remuneration for the executive directors, on a motion of the Remuneration Committee, at a meeting on 5 February 2026, as follows:

Director (thousand euro)	Initial target	% Attainment	Granted
CEO	1,000	✓ 109.98 %	1,100
CRO	105	✓ 121.75 %	128

✓ Percentage attainment of Group targets for 2025

Additionally, at a meeting on 29 October, the Board of Directors approved an extraordinary bonus consisting of delivering 300 shares to all employees in recognition of their hard work since May 2024 to successfully achieve the objective of maintaining the Bank's independence.

The shares were delivered on 19 November 2025 and form part of the short-term variable remuneration for the year. Consequently, they have been incorporated into the deferral schedule applicable to directors, in accordance with current regulations on remuneration.

In accordance with the applicable regulations, these amounts are paid as follows:

2025	2026	2027	2028	2029	2030	2031
Incentive target	40% Initial payment					
	50% €	12% Deferred payment	12% Deferred payment	12% Deferred payment	12% Deferred payment	12% Deferred payment
	50% ↗	45% €	45% €	45% €	45% €	45% €
		55% ↗	55% ↗	55% ↗	55% ↗	55% ↗
Earning period	Payment period					

€ Cash ↗ Shares

- 40% will be paid in 2026, 50% in cash and the remainder in Banco Sabadell shares (valued at the closing market price in the last trading session in the month in 2026 when the non-deferred portion is paid), the shares being subject to lock-up for at least three years from the date of delivery unless the holder owns an amount equivalent to twice their annual fixed remuneration; in any event the minimum lock-up period is one year.
- 60% will be deferred over a five-year period, with one-fifth being paid in each of the years 2027, 2028, 2029, 2029 and 2030, split 45% in

cash and 55% in Banco Sabadell shares (valued at the closing market price in the last trading session in the month when the non-deferred portion is paid), subject to the same lock-up obligation as the remuneration paid up-front in 2026.

- Since the shares will be delivered on the last trading day in February, the number of shares in this table was calculated using the weighted average price of the last 20 sessions in December 2025 (€3.334 per share). The number of shares will be updated using the closing price in the last session in February, once it is known.

Form of payment		Mr. César González-Bueno	Mr. David Vegara Figueras
Up-front	2026	€ 220	26
		↗ 66,034	7,727
Deferred	2027	€ 59	7
		↗ 21,791	2,550
	2028	€ 59	7
		↗ 21,791	2,550
	2029	€ 59	7
		↗ 21,791	2,550
	2030	€ 59	7
		↗ 21,791	2,550
	2031	€ 59	7
		↗ 21,791	2,550

€ Thousand euro ↗ Number of shares

The deferred amounts and shares are subject to malus and clawback clauses as described in section 3.1.2.B) of this Report.

In accordance with the provisions of CNMV Circular 4/2013, of 12 June, the non-deferred amount payable in cash in 2025 is set out in section C.1.a.i) of the Statistical Annex. Table C.1.a.ii) sets out both delivered shares (financial instruments that vested in 2025) and deferred shares (financial instruments at the end of 2025).

B.7.) Variable remuneration deferred from prior years that is payable in 2026

As supplementary information to tables C.1.a) i) and ii) of the Statistical Annex, it is hereby disclosed that the amount in cash and the shares for deferral for 5 years out of the short-term variable remuneration accrued in preceding years, and the severance payment for termination as executive director of María José García Beato in 2021, all in accordance with the Director Remuneration Policy, were delivered to the executive directors in 2026.

Below is a detail of the amounts of cash and shares in 2026 corresponding to deferred variable remuneration from prior years:

			Mr. César González-Bueno	Mr. David Vega Figueras	Mr. Josep Oliu Creus ¹	Ms. María José García Beato ¹
Variable remuneration	2021	€	30	5	19	—
		↗	47,513	8,490	30,278	—
	2022	€	38	5	—	—
		↗	37,305	5,427	—	—
	2023	€	53	6	—	—
		↗	54,222	6,380	—	—
	2024	€	59	7	—	—
		↗	27,217	3,298	—	—
	2020-2022	€	—	6	—	5
		↗	—	21,097	—	16,797
Long-term remuneration	2021-2023	€	50	10	13	—
		↗	104,524	21,014	26,146	—
	2022-2024	€	188	36	—	—
		↗	262,757	50,175	—	—
Termination indemnities		€	—	—	—	44
		↗	—	—	—	102,232

€ Thousand euro ↗ Number of shares

(1) Deferred amounts accrued in the period in which they were executive directors.

Note: For the 2024 variable remuneration in shares, the number of instruments was updated with the Bank's share price at the close of the last trading session in the month of settlement and payment of the immediate (not deferred) variable remuneration to match the actual accrued values. As a result, in table C.1.a.(ii) of the statistical annex on changes in share-based remuneration systems, the number of financial instruments for the 2024 variable remuneration at the beginning of 2025 does not match the amount that was reported in the 2024 Report on Director Remuneration for the end the year.

The Remuneration Committee assessed whether the conditions are met for the application of the clauses for the reduction or cancellation of the deferred variable remuneration (malus clauses) and the recovery of the amounts received (clawback clauses), based on the characteristics and circumstances of each particular case, and it concluded that none of the cases that would trigger such clauses arose in 2025.



C) Long-term remuneration

In the case of executive directors, long-term remuneration consists of the allocation to each beneficiary ("Incentive") of a certain amount in cash determined as a percentage of each beneficiary's fixed compensation (the "Target Incentive") approved by the Board of Directors. The incentive is paid 55% in shares of the Company and 45% in cash.

Payment of the Incentive is contingent upon attainment of the annual and multi-year objectives, performance of executive functions and non-termination of the employment or mercantile relationship with Banco Sabadell, S.A.

The structure of the long-term remuneration is shown below:

Scheme for payment of long-term variable remuneration

N	N+1	N+2	N+3	N+4	N+5	N+6
Incentive target	Adjusted target			60% Initial payment		
				45% €	20% Deferred payment	20% Deferred payment
				55% ↗	45% € 55% ↗	45% € 55% ↗
Earning period			Vesting period	Payment period		

€ Cash

↗ Shares

This section includes information on long-term remuneration schemes whose measurement periods include the year 2025. The calendars of the long-term incentives that are in force are shown by way of example.

Long-term remuneration	2023	2024	2025	2026	2027
2023-2025	Beginning of measurement period		End of measurement period		
2024-2026		Beginning of measurement period		End of measurement period	
2025-2027			Beginning of measurement period		End of measurement period

C.1.) Long-term remuneration 2023-2025

The long-term remuneration scheme for 2023-2025 is based on the attainment of annual and multi-year objectives (3 years), where a reference amount of long-term remuneration (amount to be received in the event of 100% attainment of both annual and multi-year objectives) was established at the beginning of the cycle.

Once 2023 had concluded, the reference amount was adjusted during the first quarter of 2024 based on the degree of attainment of the objectives for 2023 short-term variable remuneration. When determining the adjusted reference amount, the applicability of the ex-ante adjustments described above for the variable remuneration was also analysed (described in [section 2.1.1.B](#)), among other sections, of this Report).

Director (thousand euro)	Initial target	Adjusted target
CEO	751	983
CRO	138	160

In accordance with the Director Remuneration Policy, the adjusted reference amounts consisted of a cash amount (45%) and a number of shares (55%) determined using the weighted average price in the last 20 sessions in the month of December 2023, with the following result:

Director		
CEO	443 €	454,130 
CRO	72 €	73,896 

€ Thousand euro  Number of shares

Payment of the adjusted reference amount was subject to the following multi-year objectives established for the period 2023-2025:

Objective	Weighting	Outcome	% Attainment
Relative total shareholder return (TSR)	40 %	#3	135.0 %
ROTE	40 %	13.5 %	137.5 %
Sustainability	20 %	130.8 %	130.8 %
Total*	100 %	—	135.2 %

*In accordance with the regulations governing the 2023-2025 long-term remuneration, under no circumstances may the adjusted target be increased, meaning that the percentage of attainment is capped at 100%.

The Group objectives for 2023-2025 are detailed below:

Relative Total Shareholder Return (TSR)

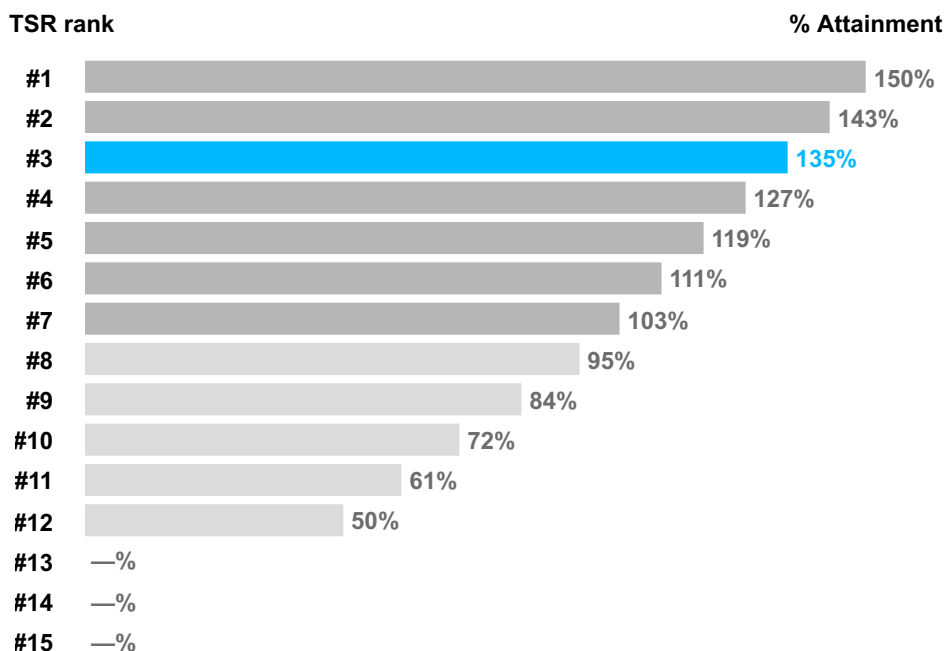
Metric that measures the total return on investment obtained by the shareholder. TSR is taken to be the sum of the dividends paid and the share price appreciation, taken as the difference between the arithmetic mean of the closing price of the share, rounded to the third decimal place, in the 20 sessions preceding the beginning date and the last 20 sessions of the years in which the end date falls. For these purposes, the beginning and end dates are as follows:

Long-term remuneration	2023-2025
Beginning date	1 January 2023
End date	31 December 2025

Banco Sabadell's TSR is compared with that of the following peer group:

Peer group		
ABN AMRO Group NV	Caixabank S.A.	Raiffeisen
Banco Bpm SpA	Erste Group	Skandinaviska Enskilda Banken AB
Bankinter S.A.	Intesa Sanpaolo SpA	Standard Chartered Bank
BBVA, S.A.	KBC Groep NV	Swedbank
BPER Banca	Mediobanca	

Attainment scale:



Percentage of attainment:

Since Banco Sabadell ranked #3 within the peer group, the percentage of attainment of this metric is 135%.

Return on Tangible Equity (ROTE)

Index that measures the return on minimum equity required to attain the CET1 early warning indicator (EWI). The numerator is the profit attributable to the group and the denominator is the minimum equity required to attain the CET1 early warning indicator (EWI).

Attainment of the objective in connection with the Return on Total Equity is measured on the basis of the ROTE at the end of the period between December 2022 and December 2025.

Attainment scale:

Value at end of period Dec. 2025	% attainment
< 8 %	0 %
> 8 %	50 %
10 % - 12 %	100 %
>12 % - <14 %	% attainment (straight-line basis)
> 14 %	150 %

Percentage of attainment:

Since the average ROTE in the period from December 2022 to December 2025 was 13.5%, 137.50% of the objective is deemed to have been achieved.

Sustainability

To reinforce the alignment of remuneration with the Group's commitment to sustainability, a synthetic sustainability indicator with a 20% weighting was added to the multi-year objectives set by the Group directly related to long-term remuneration. It is structured as a synthetic indicator linked to sustainable business (green finance, sustainability-linked finance, and other finance) and Diversity (% women in the management team).

An attainment scale is defined for the Sustainable Business indicator based on accumulated objectives for 2023-2025 and another scale is defined for the % of Women in the management team.

Scope	Metric	Weighting	Threshold	Maximum result	% Attainment
Sustainable Business	FAS financing	60 %	€29,000	€54,000	150.00 %
	Social finance				
	Finance linked to Sustainability				
	Other funding				
Diversity	% Female executives	40 %	33 %	37 %	102.08 %

Percentage of attainment:

Based on the foregoing levels of attainment, attainment of the Sustainability objective is found to be 130.80%.

Considering the percentages of attainment of the objectives and their weightings, the final percentage of attainment of the 2023-2025 long-term remuneration objectives was 100.0%. On 2 February 2026, the Remuneration Committee determined that no adjustment of any type is required to be made to this percentage, resulting in the following distribution:

Director		
CEO	443 €	454,130
CRO	72 €	73,896

€ Thousand euro Number of shares

The schedule for payment of this incentive, in accordance with the regulatory requirements, is as follows:

Director		2027 (60 %)	2028 (20 %)	2029 (20 %)
CEO	€	266	89	89
		272,478	90,826	90,826
CRO	€	43	14	14
		44,338	14,779	14,779

€ Thousand euro Number of shares

Notes:

- These amounts are subject to the malus and clawback clauses established in the Director Remuneration Policy.
- The shares that are delivered are subject to lock-up as described in [section 3.1.2.B](#)) on short-term variable remuneration.

C.2.) Long-term remuneration 2024-2026

Long-term remuneration for 2024 was approved in the same terms as for 2023, based on attainment of annual and multi-year objectives, establishing a reference amount of long-term remuneration (the amount to be received in the event of attaining 100% of the objectives).

Once 2024 had concluded, the reference amount was adjusted during the first quarter of 2025 based on the degree of attainment of the objectives for 2024 short-term variable remuneration.

Director	Initial target	Adjusted target	Cash (45 %)	No. of shares (55 %)
CEO		(856 x 128.05 %)		
	856 €	1,096 €	493 €	349,484
CRO		(145 x 126.51 %)		
	145 €	184 €	83 €	58,567

€ Thousand euro Number of shares

These amounts are linked to attainment of the long-term objectives defined for the long-term remuneration 2024-2026 and may not exceed the indicated amounts in any event.

C.3. Long-term remuneration 2025-2027

Long-term remuneration was approved for 2025 in the same terms as that approved for 2024, based on the fulfilment of annual and multi-year objectives.

Once 2025 had concluded, the reference amount was adjusted during the first quarter of 2026 based on the degree of attainment of the objectives for 2025 short-term variable remuneration; as indicated in this Report, the degree of attainment was 109.98% in the case of the CEO and 121.75% in the case of the CRO.

The Adjusted Target was calculated in February 2026 on the basis of the attainment of the 2025 Annual Variable Remuneration objectives, on a scale of 60%-150% of the initial target. The Adjusted Target is the sum of an amount in cash (45%) and an amount in Banco Sabadell shares (55%), calculated during the month of February 2026.

The multi-year targets will be measured at the beginning of 2028.

The adjusted target can be maintained or reduced, or even eliminated, depending on the degree of attainment of the Group's multi-year objectives.

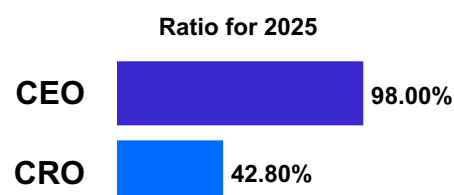
Director	Initial target	Adjusted target	Cash (45 %)	No. of shares (55 %)
CEO	1,000 €	1,100 €	495 €	131,481 ↗
CRO	173 €	210 €	95 €	34,706 ↗

€ Thousand euro ↗ Number of shares

These amounts are linked to attainment of the long-term objectives defined for the long-term remuneration 2025-2027 ([see section 3.1.2.D](#)) and may not, in any event, exceed the indicated amounts.

C.4. Ratio between fixed and variable components

The General Meeting of Shareholders on 20 March 2025 approved the maximum ratio between the executive directors' variable and fixed components at 200%. The proportion of variable to fixed remuneration items for each of the executive directors is shown below



2.1.2. Contractual conditions for executive directors, including termination indemnities

The executive directors' contractual conditions are described in [section 3.1.3](#).

No executive directors were removed in 2025, with the result that no termination indemnities accrued.

2.1.3. Malus and clawback clauses

As indicated in [section 2.1.1](#) in relation to short- and long-term variable remuneration, up to 100% of outstanding amounts are subject to the possibility of reduction or cancellation (malus clause) and the amounts already received may have to be repaid (clawback clauses).

The cases that would trigger such clauses are described in [section 3.1.2.B](#); none of them arose in 2025.



2.2 Directors' remuneration for their functions as members of the Board of Directors

Director remuneration is established on the basis of reports on director remuneration in Spain published by KPMG and Spencer Stuart (Spencer Stuart Board Index), which report on the remuneration for membership of the Boards and Committees of Spain's main financial institutions.

In accordance with the power granted to the Board of Directors by the Director Remuneration Policy, and based on the review of the remuneration model and market practices, the Board of Directors resolved on 29 January 2025 to apply the same annual amounts as for 2024, as follows:

	2025 remuneration	Attendance fees 2025 (per meeting)
(thousand euro)		
Members	100	2
Additionally:		
Chairman	1,500	
Deputy Chairman	107	
Lead Independent Director	22	

Non-executive directors also received the following amounts for membership of Board Committees:

Committee (thousand euro)	Position	Amount
Strategy and Sustainability Committee	Chairman	—
	Member	40
Credit Delegated Committee	Chairman	70
	Member	40
Audit and Control Committee	Chairman	70
	Member	40
Appointments and Corporate Governance Committee	Chairman	50
	Member	30
Remuneration Committee	Chairman	50
	Member	30
Risk Committee	Chairman	70
	Member	40

At a meeting on 25 November 2025, based on a the proposal by the Remuneration Committee, the Board of Directors approved the application of a temporary exception to the Remuneration Policy, allowing the payment of attendance fees to directors for four of the extraordinary meetings held during 2025 (€2,772 per director per meeting), linked to functions that cannot be delegated.

Based on the foregoing, the total amount actually collected by the members of the Board of Directors in 2025 is as follows (thousand euro):

Directors (thousand euro)	Director category	Board of Directors	Per diems*	Board of Directors Committees					
				RC	A&CGC	Rem C	A&CC	CrDC	S&SC
Josep Oliu Creus	Non-executive Chairman	1,600	34	0	0	0	0	0	0
Pedro Fontana García	Deputy Chairman Independent	207	34	0	50	0	0	70	40
César González-Bueno Mayer Wittgenstein	CEO	100	34	0	0	0	0	0	0
Ana Colonques García-Planas	Independent director	100	34	0	20	30	40	0	0
Aurora Catá Sala	Independent director	100	34	33	28	0	0	0	0
Luis Deulofeu Fuguet	Independent director	100	34	0	0	0	0	38	40
María José García Beato	Other external director	100	34	0	30	0	0	0	40
Mireya Giné Torrens	Independent director	100	34	0	10	50	0	23	0
Laura González Molero	Independent director	25	5	0	0	8	3	0	0
María Gloria Hernández García	Independent director	67	25	23	0	0	19	0	0
George Donald Johnston	Lead Independent Director	122	32	64	0	0	0	0	30
David Martínez Guzmán	Proprietary director	92	29	0	0	0	0	0	0
Alicia Reyes Revuelta	Independent director	25	5	7	0	0	0	6	0
Margarita Salvans Puigbo	Independent director	58	23	0	0	15	20	0	0
Manuel Valls Morató	Independent director	100	34	40	0	0	70	0	0
David Vegara Figueras	Executive director	100	34	0	0	0	0	0	0
Pedro Viñolas Serra	Independent director	100	34	0	20	0	18	37	0

RC	Risk Committee
A&CGC	Appointments and Corporate Governance Committee
RemC	Remuneration Committee
A&CC	Audit and Control Committee
CrDC	Credit Delegated Committee
S&SC	Strategy and Sustainability Committee

Mr. Luis Deulofeu Fuguet collected €30 thousand as an ordinary member of the Board of Directors of Sabadell Digital S.A.U.

Ms. Mireya Giné Torrens collected €30 thousand as an ordinary member of the Board of Directors of Sabadell Consumer Finance, S.A.

The Board of Directors met 19 times in 2025.

* Includes extraordinary attendance fees.

The amounts actually received depend on the date of appointment and on meeting attendance, and they are detailed in the Statistical annex to this Report.

The directors did not collect any other supplementary remuneration from the Institution or any other Group institution in 2025 as consideration for services rendered other than those inherent to their position, or any other remuneration items such as advances, loans or guarantees, or any remuneration by virtue of payments by the Bank to a third party, or any other remuneration not disclosed in this report.





3. Director Remuneration Policy applicable in 2026

Banco Sabadell regularly reflects on its current Director Remuneration Policy, considering the following:

The Bank's actual situation

- **Aligning** remuneration with the short- and long-term objectives set out in the Institution's strategy.
- **Commitment to sustainability:** this is an essential element of the Group's remuneration policy. The components of remuneration contribute to fostering action in environmental, social and governance (ESG) matters in order to make the business strategy sustainable and socially responsible.
- **Prudent risk management:** discouraging the taking of present and future risks that go beyond the level tolerated by the Group, while taking customers' interests into account.
- **Banco Sabadell's Remuneration Policy:** particularly the one applied to members of the Group's Identified Staff and Senior Management.

External factors

- **Regulations:** strict compliance with the regulatory requirements on remuneration.
- **Stakeholders:** recommendations received in the course of Banco Sabadell's regular engagement with investors, shareholders and proxy advisors.
- **Market practices:** credit institutions that may compete for business or talent.
- **Governance:** general corporate governance recommendations at a national and international level.

During the year, based on proposals by the Remuneration Committee, the Board of directors applies the measures it considers to be appropriate in the Director remuneration system within the limits established by the Policy. However, if the Board of Directors considers that the measures to be implemented require an amendment to the policy or a new Remuneration Policy, it may propose such a change or a new Remuneration Policy to the General Meeting of Shareholders.

As disclosed in a communication of Other Relevant Information dated 5 February 2026, the Board of Directors, at a meeting on 5 February 2026, approved, by mutual agreement with Mr. César González-Bueno, his replacement as Chief Executive Officer of Banco Sabadell and accepted his resignation as a director of the Bank, effective at the next General Meeting of Shareholders. The Board of Directors also approved the appointment of Mr. Marc Armengol Dulcet as an executive director with the status of chief executive officer to fill the vacancy left by the resignation of Mr. César González-Bueno. The resignation and appointment will take effect at the end of the bank's next Ordinary General Meeting of Shareholders, provided that the European Central Bank has issued a fit and proper assessment of Mr. Marc Armengol Dulcet by that date. If it is received after that meeting, the change will take effect on the date on which that fit and proper clearance is received.

Furthermore, at the aforementioned meeting on 5 February 2026, the Board of Directors approved the appointment of Mr. Carlos Ventura Santamans as an executive director, to take charge of the business in Spain, including Corporate Banking, Retail Banking, Private Banking and the branch network.

In 2026, it will be necessary to draw up and approve the remuneration policy for 2027, 2028 and 2029, establishing the characteristics derived from the changes in the corporate governance structure, for submission to the next Ordinary General Meeting of Shareholders of Banco de Sabadell.

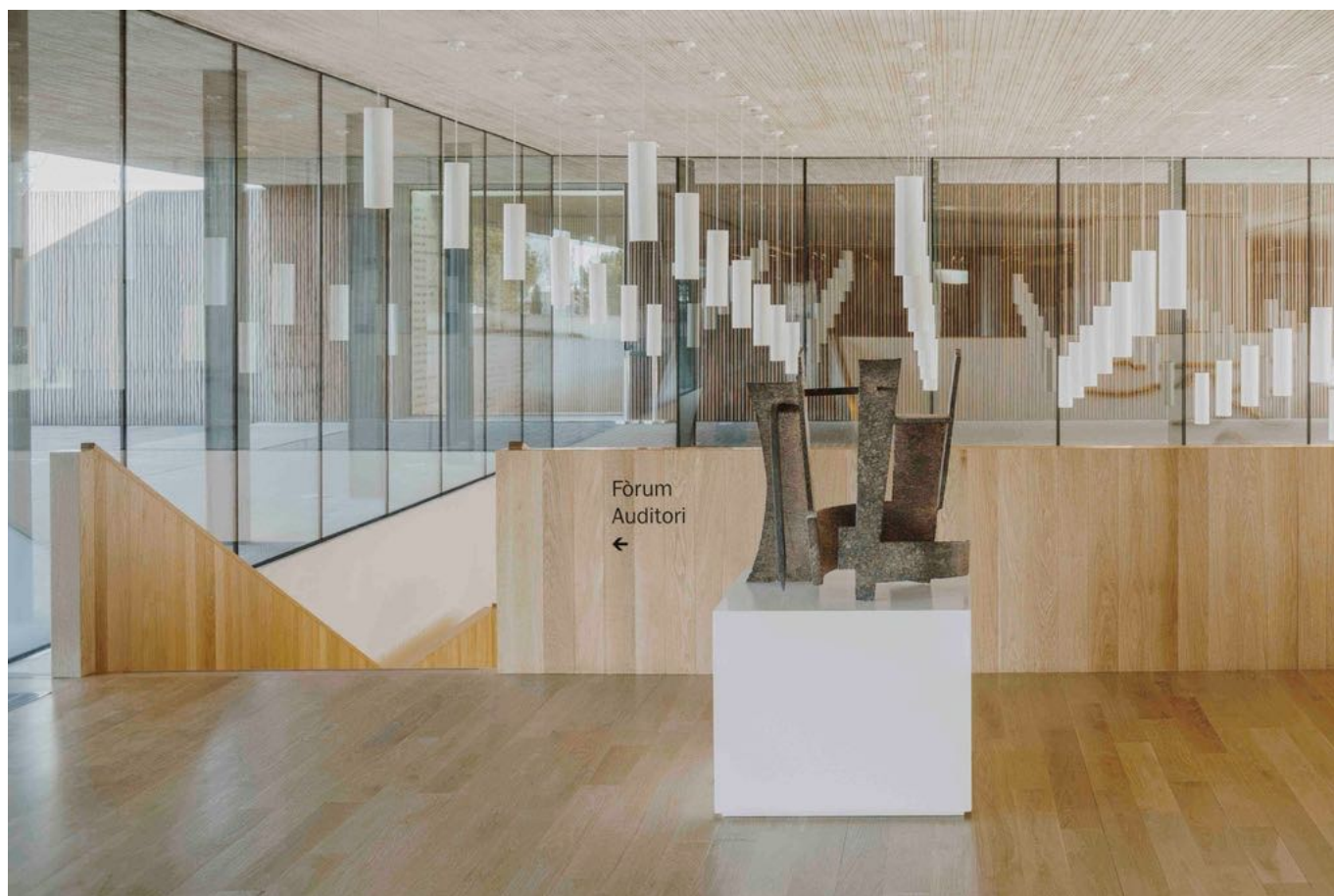


3.1. Remuneration for Executive Directors

3.1.1. Remuneration system

In addition to their remuneration for membership of the Board of Directors, executive directors are paid for performing executive functions, as provided in the Articles of Association of Banco Sabadell, under the same headings as members of Banco Sabadell Senior Management and the rest of the Identified Staff.

Executive director remuneration is set each year by the Board of Directors within the maximum overall amount established by the General Meeting of Shareholders by approving the Director Remuneration Policy for each remuneration item. The Board of Directors will comply with the applicable regulations, taking into account its specific status as a financial institution and in line with the items, terms and conditions established in the new Director Remuneration Policy, which takes a comprehensive view of total remuneration including all remuneration components and the relationship between them, striking an appropriate balance between fixed and variable remuneration, as well as between the distribution of short- and long-term payments, while safeguarding the rights and interests of shareholders, investors and customers.



The remuneration items for each executive director for 2026 are set out in this section 3.1. The Chief Executive Officer, Mr. César González-Bueno, will receive the proportional amount of remuneration until the 2026 Annual General Meeting of Shareholders, or until the date his resignation takes effect, if later. The remuneration envisaged for 2026 for Chief Executive Officer, Mr. Marc Armengol Dulcet, will be proportional to date on which his appointment to that position takes effect.

The effective date of both the resignation and the appointment of the Chief Executive Officer will be the date of the General Meeting of Shareholders or the date of receipt of the required clearance from the European Central Bank, if later.

2026 remuneration, annualized ⁽²⁾ (thousand euro)	CEO (Mr. César González-Bueno)	CEO (Mr. Marc Armengol Dulcet)
Fixed salary	2,070 ⁽¹⁾	1,375
Benefits and remuneration in kind	Similar amounts to 2025	**
Retirement and savings plans	301	301
Short-term variable remuneration	Target*: 1,035 Maximum: 1,490	Target*: 750 Maximum: 1,080
Long-term remuneration	Target*: 1,035 Maximum: 1,490	Target*: 750 Maximum: 1,080

(1) After personal income tax withholdings, the CEO, Mr. César González-Bueno, must systematically a net annual amount equivalent to €300 thousand gross of his fixed remuneration in shares of Banco Sabadell, S.A. Those shares will be under lock-up for a period of five years or until the date of abandoning the Institution, whichever is earlier.

The remuneration of the CRO and General Manager-Spain are detailed below:

2026 remuneration, annualized ⁽²⁾ (thousand euro)	CRO (Mr. David Vegara Figueras)	General Manager - Spain (Mr. Carlos Ventura Santamans)
Fixed salary	717	1,052
Benefits and remuneration in kind	Similar amounts to 2025	**
Retirement and savings plans	137	317
Short-term variable remuneration	Target*: 111 Maximum: 160	Target*: 591 Maximum: 851
Long-term remuneration	Target*: 179 Maximum: 258	Target*: 263 Maximum: 379

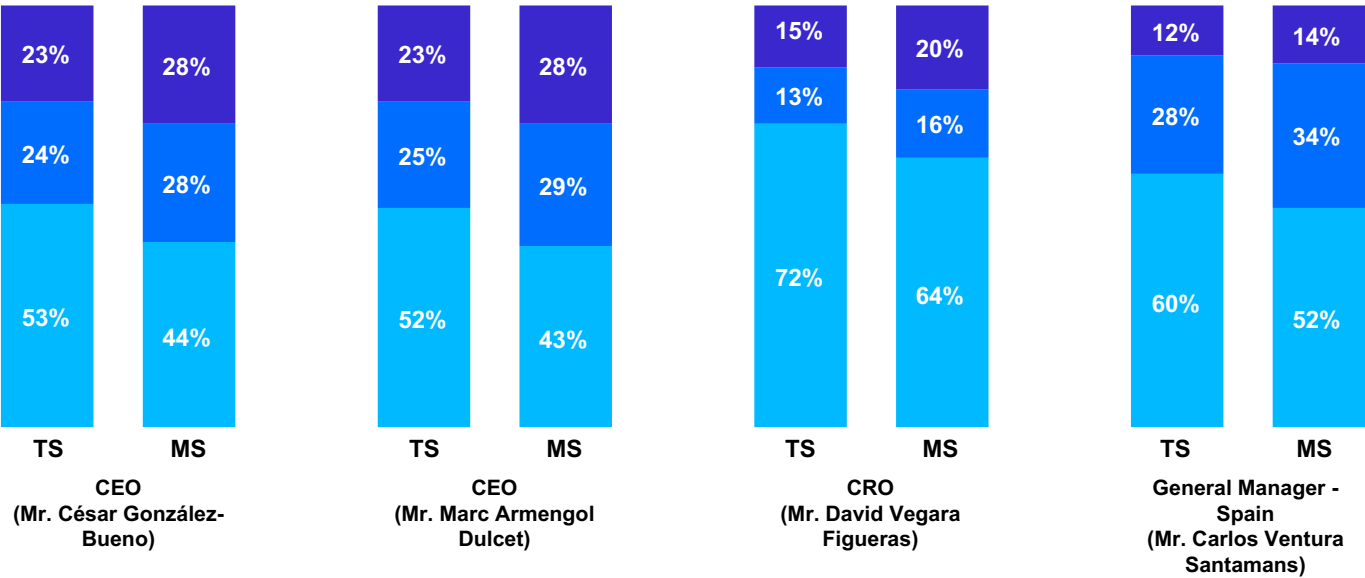
* Target: remuneration to be allocated in the event that 100% of the objectives are achieved.

Maximum: maximum amount of the variable remuneration to be allocated in the event of exceeding the objectives.

** With regard to benefits and remuneration in kind, it is envisaged that the new executive directors will receive, under the same conditions, the goods and services to which the rest of the Bank's staff are entitled for these purposes and those defined at any given time for senior management.

(2) These amounts are expressed in annualised terms, regardless of the effective date of appointment or termination; the actual amount paid is proportional to the time spent in office.

Accordingly, the proportion between an executive director's fixed and variable remuneration, assuming attainment of the objectives and a maximum attainment scenario, is as follows:



- Fixed salary + benefits + pension benefits
 - Short-term variable remuneration + discretionary pension benefits
 - Long-term remuneration
- TS** Target scenario
MS Maximum scenario



Scheme for payment of short-term variable remuneration

2026	2027	2028	2029	2030	2031	2032
Incentive target	40% Initial payment					
	50% €	12% Deferred payment	12% Deferred payment	12% Deferred payment	12% Deferred payment	12% Deferred payment
	50% ↗	45% €	45% €	45% €	45% €	45% €
		55% ↗	55% ↗	55% ↗	55% ↗	55% ↗
Earning period	Payment period					

€ Cash

↗ Shares

Scheme for payment of long-term variable remuneration

2026	2027	2028	2029	2030	2031	2032
Incentive target	Adjusted target			60% Initial payment		
				45% €	20% Deferred payment	20% Deferred payment
				55% ↗	45% €	45% €
					55% ↗	55% ↗
Earning period			Vesting period	Payment period		
The Adjusted Target will be calculated in February 2027 based on the attainment of the 2026 Annual Variable Remuneration objectives (60%-150% of the initial target). The Adjusted Target is the sum of an amount in cash (45%) and an amount in Banco Sabadell shares (55%), calculated during the month of February 2027.			Early 2029: Measurement of multi-year objectives			
The adjusted target can only be maintained or reduced, or even eliminated, depending on the degree of attainment of the Group's multi-year objectives.						

€ Cash

↗ Shares

3.1.2. Details of the remuneration items

In accordance with the Director Remuneration Policy, the Board of Directors is empowered, on the motion of the Remuneration Committee, to set the amounts of annual fixed and variable remuneration for each of the executive directors within the maximum established amounts.

A. Fixed remuneration

In accordance with the Director Remuneration Policy, the maximum combined amount of fixed remuneration for executive directors is €6 million per year: Within that limit, which includes fixed annual remuneration in cash and in shares as well as benefits and retirement and long-term savings plans as specified by contract, the Board of Directors sets the individual remuneration amounts based on a favourable report by the Remuneration Committee.

The amounts comprising the fixed remuneration of the executive directors under the applicable Policy are listed below:

Description	Additional information
Fixed salary	Paid monthly in cash. This remuneration is set by the Board of Directors on the motion of the Remuneration Committee.
Benefits and remuneration in kind	In 2025, the executive directors are beneficiaries of, inter alia, a group life insurance policy, school aid and Christmas hamper (as applicable to all the Bank's employees) and a medical insurance policy and risk coverage (also applicable to the Bank's management team), and they have the use of a vehicle on the same terms as the other members of Senior Management.
Pension plan	Like all other employees, the executive directors are members of the B Group defined contribution occupational pension plan, which pays out on retirement as an employee.
Retirement and savings plans*	The CEO is the beneficiary of a defined-contribution group savings insurance policy that pays out upon termination of the contract, death or absolute permanent disability, conditional upon diligent performance in his capacity as CEO. The CRO and the General Manager-Spain are the beneficiaries of a defined-contribution executive group insurance policy which will pay out in the event of effective retirement, death or permanent and absolute disability, except where, in the absence of express interest on the part of Banco Sabadell, the beneficiary continues to work at Banco Sabadell beyond the age defined by law for collecting retirement benefit, in which case all economic rights are forfeited. Both policies allow for the benefit to be received as a lump sum, an annuity or a combination of the two, in accordance with current legislation. The plans are compatible with termination indemnities.

(*) Discretionary pension benefits: from the entry into force of Bank of Spain Circular 2/2016, of 2 February, to credit institutions, on supervision and capital adequacy, which completes the adaptation of Spanish law to Directive 2013/36/EU and Regulation (EU) 575/2013, 15% of contributions are treated as discretionary pension benefits and, consequently, are linked to the percentage attainment of the beneficiary's short-term objectives, capped at 100% of the amount.

Consequently, 15% of the contributions to be made in 2026 in relation to the group executive insurance policy on behalf of the CEO and CRO will be adjusted on the basis of the degree of attainment of the short-term variable remuneration objectives.

Description (thousand euro)	CEO (Mr. César Gonzalez-Bueno)	CEO (Mr. Marc Armengol Dulcet)	CRO (Mr. David Vegara Figueras)	General Manager - Spain (Mr. Carlos Ventura Santamans)
Fixed salary	2,070 ⁽¹⁾	1,375	717	1,052
Benefits and remuneration in kind	Similar amounts to 2025 ⁽²⁾	*	Similar amounts to 2025 ⁽²⁾	*
Pension plan	1	1	1	1
Retirement and savings plans	300	300	136	316

(1) After personal income tax withholdings, the CEO, Mr. César González-Bueno, must systematically invest a net annual amount equivalent to €300 thousand gross of his fixed remuneration in shares of Banco Sabadell, S.A. Those shares will be under lock-up for a period of five years or until the date of abandoning the Institution, whichever is earlier.

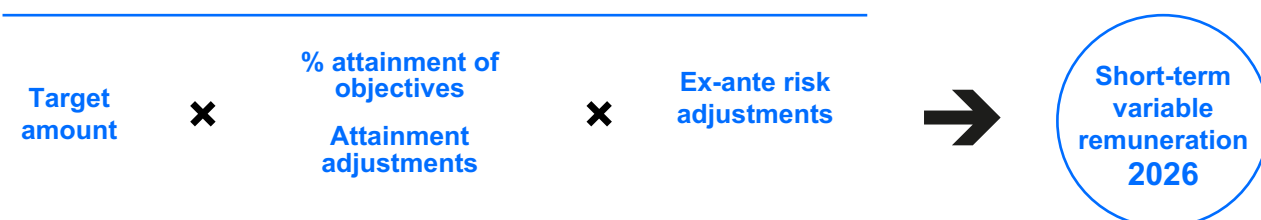
(2) The amounts in 2025 are detailed in [section 7](#). Statistical annex, table i).

* With regard to benefits and remuneration in kind, it is envisaged that the new executive directors will receive, under the same conditions, the goods and services to which the rest of the Bank's staff are entitled for these purposes and those defined at any given time for senior management.

The CRO's remuneration is predominantly fixed in order to reflect the nature of his work and so as not to compromise his independence vis-à-vis the business units that he oversees.

B. 2026 Short-term variable remuneration

The Director Remuneration Policy establishes that short-term variable remuneration is calculated as follows:



B.1. Target and maximum amounts

Description	Additional information
Short-term variable remuneration	Reflect performance in the year, measured through annual objectives aligned with the risk incurred. The executive directors are assigned Group objectives, which include risk control and management metrics, and capital metrics, and may also have strategic objectives, with a weighting assigned to each indicator, and a scale of attainment. The objectives assigned to each executive director for 2026 are set out in this section.

Description (thousand euro)	CEO (Mr. César Gonzalez-Bueno)	CEO (Mr. Marc Armengol Dulcet)	CRO (Mr. David Vegara Figueras)	General Manager - Spain (Mr. Carlos Ventura Santamans)
Short-term variable remuneration	Target: 1,035 Maximum: 1,490	Target: 750 Maximum: 1,080	Target: 111 Maximum: 160	Target: 591 Maximum: 851

B.2. Objectives and metrics

The breakdown of the objectives for 2026 is as follows:

Group objectives for 2026:

Metric	Weighting
Group net profit	10 %
ROTE	15 %
Capital generation	10 %
Net interest income plus net fees and commissions	10 %
Group expenses + Depreciation & amortization	10 %
Asset quality	15 %
Market share	10 %
Service quality	10 %
Sustainability	10 %

Definition of objectives:

Metric	Definition
Group net profit	Profit that is directly attributable to the parent company, calculated by deducting minority interests from profit for the year.
ROTE	<i>Return on tangible equity.</i>
Capital generation	Change in the year in the CET1 ratio plus dividends accrued in the year
Net interest income + Net fees and commissions	Banco Sabadell Group consolidated net interest income plus net fees and commissions in 2025.
Group expenses + Depreciation & amortization	Personnel expenses + General expenses + Depreciation + Amortisation + Recovery costs
Asset quality	Cost of Risk (5 %) + NPA volume (5 %) + Coverage ratio (5 %).
Market share	A synthetic indicator focused on increasing profitability and revenue. It is composed of indicators of market share of loans and advances in Spain, market share of net fees and commissions with respect to credit institutions operating in Spain, and market share of active customers in the private individuals segment.
Service quality	A synthetic indicator that reflects the rating of service quality by the Group's customers, distinguishing between commercial segments and relationship channels, and the employee satisfaction index.
Sustainability	A synthetic valuation indicator comprising metrics linked to sustainable business (green and sustainability-linked financing), diversity (% female executives), upgrades by the main rating agencies/ESG indices and Sustainable Finance Plan.

As part of the review of the Banco Sabadell Group's annual objectives for 2026, and in line with supervisory recommendations aimed at strengthening prudent risk management and capital adequacy, a new strategic indicator has been added: Capital Generation.

This objective, defined as the change in the CET1 ratio during the year plus dividends accrued in the same period, aims to reinforce the Bank's commitment to improving capital adequacy and creating sustainable value for shareholders. Adding this indicator also entails an increase in the weighting of control and risk objectives in the Group's

overall annual objectives, rising from 15% in 2025 (just one objective) to 25% in 2026 (two objectives).

With this measure, the Banco Sabadell Group is advancing in aligning its remuneration policy with good practices in corporate governance and with the expectations of supervisory bodies, ensuring that variable remuneration is linked to profitability, financial soundness and appropriate risk management.

Objectives of the CEO

In the case of the CEO, 80% of the objectives are linked to the Group's objectives and the other 20% depend on an individual qualitative assessment adopted by the Remuneration Committee on the motion of the Chairman.

Table of objectives

80%	Group objective
20%	Valoración cualitativa individual

Objectives of the CRO

The methods used to set the CRO's objectives and determine his variable remuneration must not compromise his objectivity or independence.

In the case of the CRO, 25% of the objectives are linked to the Group's objectives and the other 75% is indexed to individual objectives that, in turn, are composed of functional objectives (55%) and an individual qualitative assessment (20%). These functional objectives are aligned with the oversight functions he performs, independent of the business and corporate areas, and are focused on the oversight and monitoring of transactions and of the risks that arise from such transactions, ensuring compliance with applicable laws, rules and regulations, and advising management on matters in his area of expertise.

Table of objectives

25%	Group objective	
55%	Functional objectives	Contribution to improving the SREP results Management satisfaction and diversity Contribution to the proper functioning of the Risk Committee Fulfilment of 2LoD action plans Development and implementation of the annual regulatory model plan Stress test improvements and proper delivery of geopolitical stress test Increase external impact of Public Policy area
20%	Individual qualitative assessment	

In this regard, the functional objectives set for the CRO for 2026 revolve around the following parameters:

Quantitative objectives include contributing to improvements in the SREP result and Management Satisfaction and Diversity. The Satisfaction objective is measured through engagement surveys conducted among the entire workforce and evaluating the change in the score compared to the previous year. The diversity objective refers to the scope of the manager's responsibility.

Qualitative objectives: contributing to the proper functioning of the Risk Committee, fulfilment of the second line of defence (2LoD) action plans, development and implementation of the annual regulatory model plan, stress test improvements and proper delivery of the geopolitical stress test exercise, and increasing the external impact of the Public Policy area.

Of the CRO's functional objectives, 40% are quantitative while the other 60% relate to qualitative assessments made by the Risk Committee.

Objectives of the General Manager - Spain

In the case of the General Manager - Spain, 30% of the objectives are linked to the Group's objectives and the other 70% are indexed to individual objectives that, in turn, are composed of functional objectives (50%) and an individual qualitative assessment (20%). These functional objectives are aligned with his duties as head of the business in Spain, which includes Corporate Banking, Retail Banking, Private Banking and the branch network.

Since his appointment in charge of these areas is recent, the functional objectives will be set shortly by the Board of Directors, at the proposal of the Remuneration Committee, and will be disclosed in the pertinent public reports.

B.3. Attainment scale

	% attainment		
	<50%	50% - 150%	>150%
Group objectives	0%	50% - 150%	150%
Functional objectives	0%	50% - 150%	150%
Individual qualitative assessment		Max. 120%	

Regarding the Group objectives, which are applied as functional objectives for the CEO, attainment parameters have been set between 50% and 150% for each of the objectives, based on a non-linear scale of attainment established beforehand by the Remuneration Committee for each objective. Attainment of under 50% is considered as 0% for the purposes of counting overall attainment.

In the case of the CRO's functional objectives, the attainment parameters are set between 50% and 150%.

In the qualitative assessment, attainment is capped at 120%.

In order to qualify for variable remuneration, overall attainment of the objectives must exceed 60%. No variable remuneration is accrued under 60%, and no additional variable remuneration is accrued above 144%.

B.4. Prudential adjustments for attainment of objectives

The amount to be actually received will be determined by the degree of attainment of the established Group objectives, adjusted by a correction factor based on the relationship between the Institution's capital (CET1 and MREL) and liquidity (Liquidity Coverage Ratio) and the limits set in the Risk Appetite Statement (RAS). Failure to meet any of these indicators will result in a reduction in variable remuneration; failure to meet the RAS tolerance threshold for these indicators will result in zero attainment of the Group's 2026 objectives.

In addition, there are prudential mechanisms for adjusting the CRO's individual attainment, based on exceedance of expected loss thresholds in terms of operational risk and/or internal control indicators.

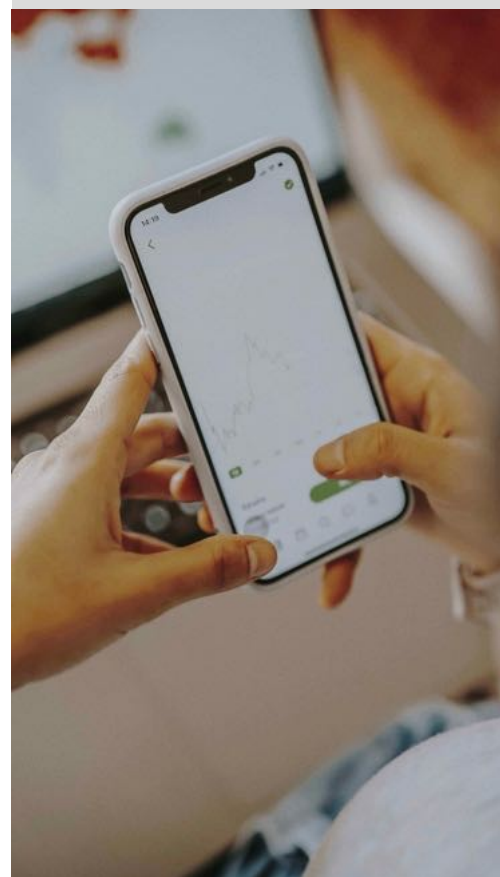
B.5. Ex-ante risk adjustments

The amount of any short-term remuneration item is subject to downward adjustment at the discretion of Board of Directors, on a motion by the Remuneration Committee, and may even be reduced to zero, depending on the following parameters:

- An adjustment to variable remuneration based on risk profile and earnings performance. The adjustment may be applied at Group, unit, country or even individual level, to reflect the various classes of risk. This variable remuneration adjustment, which can reduce the initial pool of available remuneration to zero, ensures that the variable remuneration is fully aligned with the risks assumed. The variable remuneration adjustment will cover all the cases or situations that might have an impact on the Group's risk profile and that were not fully factored into the assessment of the objectives set at the beginning of the year, and will be related to risk and control factors such as breaches of standards and regulations, exceedance of risk limits (e.g. RAS [capital, liquidity] or exceedance of expected loss thresholds in terms of operational risk) and/or internal control indicators (e.g. results of internal audits) or similar items.
- The possibility of reduction to zero if the Bank's capital is less than the Maximum Distributable Amount (MDA) determined by regulation at any given time.
- The executive directors' variable remuneration for 2026 incorporates an automatic adjustment mechanism. Under this mechanism, accrual of variable remuneration is contingent on attainment of thresholds for attributable net profit and the CET1 capital ratio, which will be defined each year by the Board of Directors.

If Net Profit and the CET1 ratio do not reach the thresholds, there will be no entitlement to annual variable remuneration. This mechanism ensures that variable remuneration is aligned with the Bank's financial strength and stability, ensuring that payments linked to its overall performance are only made when the established profitability and solvency requirements are met.

The purpose of this adjustment is to strengthen the link between variable remuneration and the ability to generate sustainable profits and maintain adequate capital, thereby contributing to prudent risk management and the long-term sustainability of the Banco Sabadell Group.



B.6. Malus and clawback clauses

Short-term variable remuneration and long-term remuneration that has not yet been collected (up to 100% of the amount) may be reduced or cancelled (malus clause) or clawed back in the event of poor financial performance by the Bank as a whole or by a specific division or area or by the exposures generated by the executive director in question. They will also apply in the event of actions or omissions by the executive director to whom they are applicable that are in breach of the applicable regulations or the internal rules of the Company or that are otherwise irregular. It is not necessary for there to be malice or negligence in order for these clauses to apply. For these purposes, the performance assessment will be compared with subsequent performance of the variables that contributed to achieving the objectives.

The following factors will be considered:

- Significant failures in risk management by the Institution or a business unit.
- An increase in capital requirements at the Institution or one of its business units not envisaged at the time that the exposure was generated.
- Regulatory penalties or legal convictions for events attributable to the unit or its managers. Failure to comply with the Institution's internal codes of conduct.
- Improper conduct, whether individual or collective. Particular consideration will be given to the negative effects deriving from marketing unsuitable products and the liability of the persons or bodies making such decisions.

Malus clauses may be triggered during the period in which variable remuneration is deferred. Clawback clauses may be triggered from the time the remuneration is paid up to conclusion of the corresponding lock-up period. Application of clawback clauses may be supplementary to the application of malus causes so that, in addition to forfeiting amounts not yet received, the executive director may be required to refund part or all of the amounts already received as short-term variable remuneration or long-term remuneration.

The Remuneration Committee must review the situation each year in order to make a proposal to the Board of Directors, if necessary, based on a report by the People and Sustainability Division, and after seeking the opinion of the Internal Control Division, the Finance Division and the Compliance Division as to whether circumstances have arisen to reduce or cancel the deferred remuneration or trigger clawback of variable remuneration already collected by an executive director, depending on the characteristics and circumstances of each particular case.

B.7. Payment procedure

This remuneration is deferred and paid in equity instruments, in accordance with the applicable regulations.

Accordingly, actual receipt of the executive directors' short-term variable remuneration for 2026 will be subject to the following scheme (see [section 3.1.1](#)):

- 40% of the variable remuneration for 2026 will be paid in 2027, split 50% in cash and 50% in Banco Sabadell shares (valued at the closing market price in the last trading session in the month in 2027 when it is paid), the shares being subject to a lock-up of at least one year.*
- 60% of the variable remuneration for 2026 will be deferred over a five-year period, with one-fifth being paid in each of the years 2028, 2029, 2030, 2031 and 2032, split 45% in cash and 55% in Banco Sabadell shares (the number being determined on the basis of the closing market price in the last trading session in the month in 2027 when they are delivered).

* Variable remuneration paid in shares is subject to lock-up of at least one year. In line with recommendation 62 of the Code of Good Governance, unless executive directors own shares amounting to the equivalent of twice their fixed annual remuneration, they may not dispose of the shares they receive until at least three years have elapsed from the time of delivery. The above condition will not apply to any shares that the director must dispose of to cover tax obligations related to their delivery.

The use of personal hedging strategies or any mechanism that guarantees receipt of part or all of the variable remuneration is not permitted.

C. Long-term remuneration 2026-2028

Executive directors receive long-term remuneration granted each year in overlapping cycles.

The long-term remuneration scheme for 2026-2028 is based on the attainment of annual and multi-year objectives (3 years), where a reference amount of long-term remuneration (amount to be received in the event of 100% attainment of both annual and multi-year objectives) is established at the beginning of the cycle.

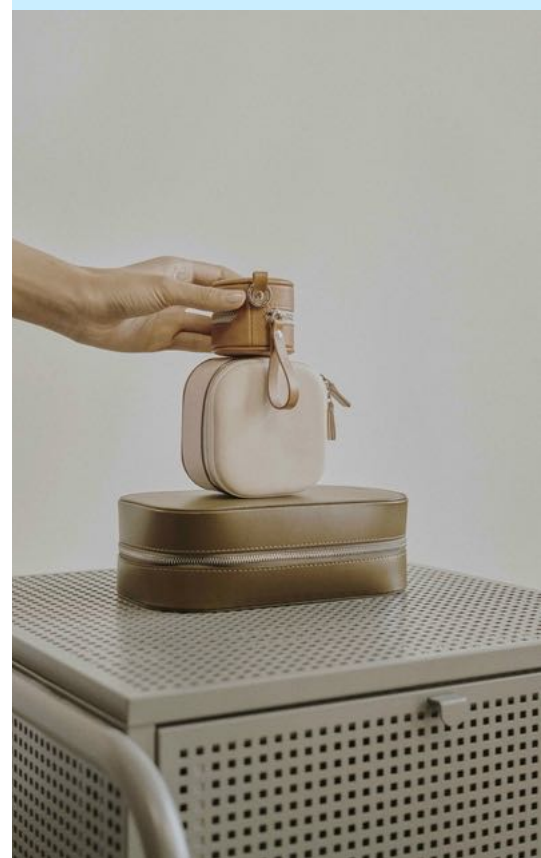
After the first year of the cycle has concluded, the reference amount is adjusted during the first quarter based on the following factors:

- Degree of attainment of the objectives for short-term variable remuneration in the first year of the cycle.
- Ex-ante adjustments, if any.

This adjustment may result in the reference amount being zero or, in the event of overachievement of annual objectives, at most 144% of the reference amount in the case of both directors.

Payment of the adjusted reference amount, determined as a cash amount (45%) and a number of shares (55%), will depend on the degree of attainment of the multi-year objectives (period of three years). The final amount to be paid may not exceed the adjusted reference amount (which may not be increased in any event).

Additionally, as in the case of annual objectives, a risk-related correction factor will be applied that includes indicators relating to capital (CET1 and MREL) and liquidity (Liquidity Coverage Ratio), and an attainment adjustment. Breach of the tolerance threshold in the RAS for liquidity or capital adequacy result in the long-term remuneration being reduced to zero.



C.1.) Target and maximum amounts

Description	Additional information
Long-term remuneration	Measure the Group's and the executive director's performance over a multi-year time-scale. The annual objectives determine the amount assigned, to the same extent as in the case of short-term variable remuneration. Based on that amount, the multi-year objectives determine the amount to be actually received, which may be less (but never more) than the amount assigned on the basis of annual objectives. The objectives assigned to each executive director for the various cycles that are current in 2026 are set out in section 3.1.2.C).

Description	CEO (Mr. César Gonzalez-Bueno)	CEO (Mr. Marc Armengol Dulcet)	CRO (Mr. David Vegara Figueras)	General Manager - Spain (Mr. Carlos Ventura Santamans)
(thousand euro)				
Long-term remuneration	Target: 1,035 Maximum: 1,490	Target: 750 Maximum: 1,080	Target: 179 Maximum: 258	Target: 263 Maximum: 379

C.2.) Objectives and metrics

The same objectives as for short-term variable remuneration are applicable to determine the adjusted reference amount.

The indicators for the multi-year objectives for the period 2026-2028 are detailed below.

Objective	2026-2028
Total Shareholder Return (TSR)	30%
Return on Tangible Equity (ROTE)	30%
Capital generation	20%
Sustainability	20%

The main features of each of those metrics are described below:

Relative Total Shareholder Return (Relative TSR)

Definition:

A metric of the shareholders' total return on investment. TSR is taken to be the sum of the dividends paid and the share price appreciation, taken as the difference between the arithmetic mean of the closing price of the share, rounded to the third decimal place, in the 20 sessions preceding the beginning date and the last 20 sessions of the year in which the end date falls. For these purposes, the beginning and end dates are as follows:

Long-term remuneration	2026-2028
Beginning date	1 January 2026
End date	31 December 2028

In order to apply market best practices and in line with the recommendations received in Banco Sabadell's regular engagement with investors, shareholders and proxy advisors, the improvements introduced in 2026 to calculate attainment of the TSR indicator have been maintained:

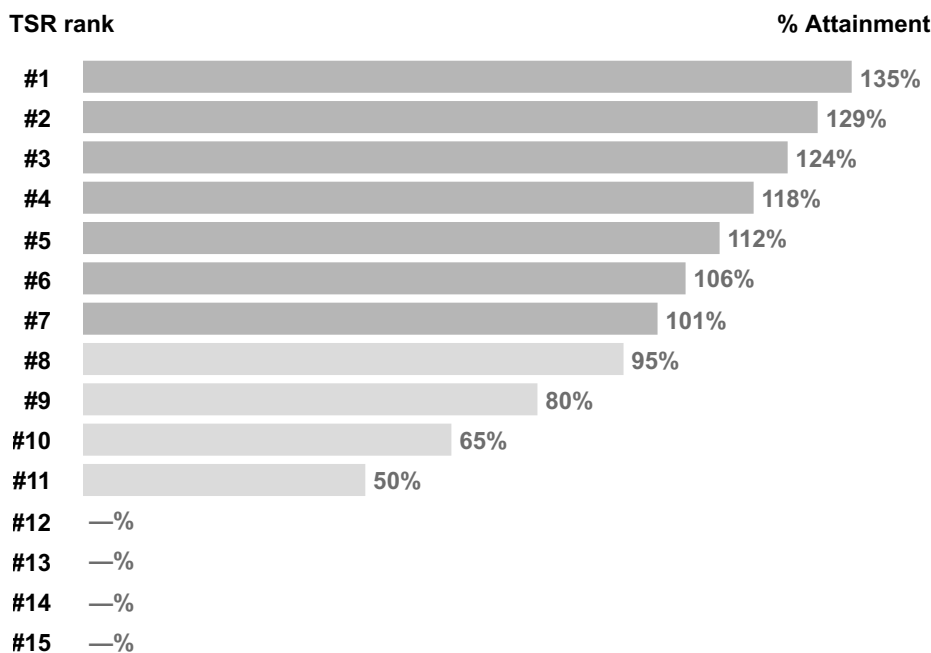
- The maximum level of attainment is 135%.
- Attainment of more than 100% requires that the TSR exceed the median.
- Any position in the last quartile entails 0% attainment.

Banco Sabadell's TSR will be compared with that of the following peer group:

<i>Peer group</i>		
ABN AMRO Group NV	Caixabank S.A.	Raiffeisen
Banco Bpm SpA	Commerzbank AG	Skandinaviska Enskilda Banken AB
Bankinter S.A.	Erste Group	Standard Chartered Bank
BBVA, S.A.	Intesa Sanpaolo SpA	Swedbank AB
BPER Banca, SpA	KBC Groep NV	

To ensure that the comparison is made on a like-for-like basis, the Board of Directors has the power, based on a proposal from the Remuneration Committee, to adapt, where appropriate, the composition of the sample of entities in the event of unforeseen circumstances affecting the aforementioned companies (e.g. mergers, spin-offs, delisting, etc.) and to adapt the TSR calculation for any transactions (e.g. rights issues) by those entities that affect the value of the shares.

Attainment scale:



Return on Tangible Equity (ROTE)

Definition:

Recurring ROTE is determined as the average of the values obtained in the months of December during the measurement period (2026-2028).

Attainment scale:

The following attainment scale is defined:

0%	50%	100%	150%
<14 %	>14 %	15 % - 16 %	>17 %

Attainment is increased on a straight-line basis for attainment between 50% and 100% and between 100% and 150%.

Capital generation

Capital generation (pb) is a financial indicator that assesses the Group's ability to increase common equity during the 2026-2028 period. The indicator combines:

- The change in the CET1 capital ratio between the beginning and end of the period, taking into account any shareholder remuneration, in relation to risk-weighted assets (RWA) at year-end.

Attainment scale:

The following attainment scale is defined:

50 %	100 %	150 %
130 %	170 %	210 %

- Additionally, this indicator will measure the percentage of attainment based on Banco Sabadell's ranking in the peer group according to this metric at the end of the measurement period, using the same attainment scale as for the Relative TSR target.

Sustainability

Definition:

A synthetic indicator that combines two of the bank's major ESG goals, one environmental and one social, thereby reinforcing Banco Sabadell's commitment to sustainability in the broadest sense. Specifically, it combines:

- Sustainable Business (environmental component): measures the volume of sustainable financing mobilised by the Group, including FAS financing (transactions aligned with the EU taxonomy for sustainable activities), sustainability-linked financing, social impact financing and other sustainable finance.
- Management Diversity (social component): reflects the percentage of women in management positions within the Group. A multi-year target has been set to increase female representation in senior management by 2028, in line with the bank's stated commitments on gender equality.

The Sustainability Indicator combines both components to obtain a single result. Currently, the internal methodology for calculating the indicator assigns greater weight to Sustainable Business (60%) than to Diversity (40%), thus ensuring that the environmental dimension

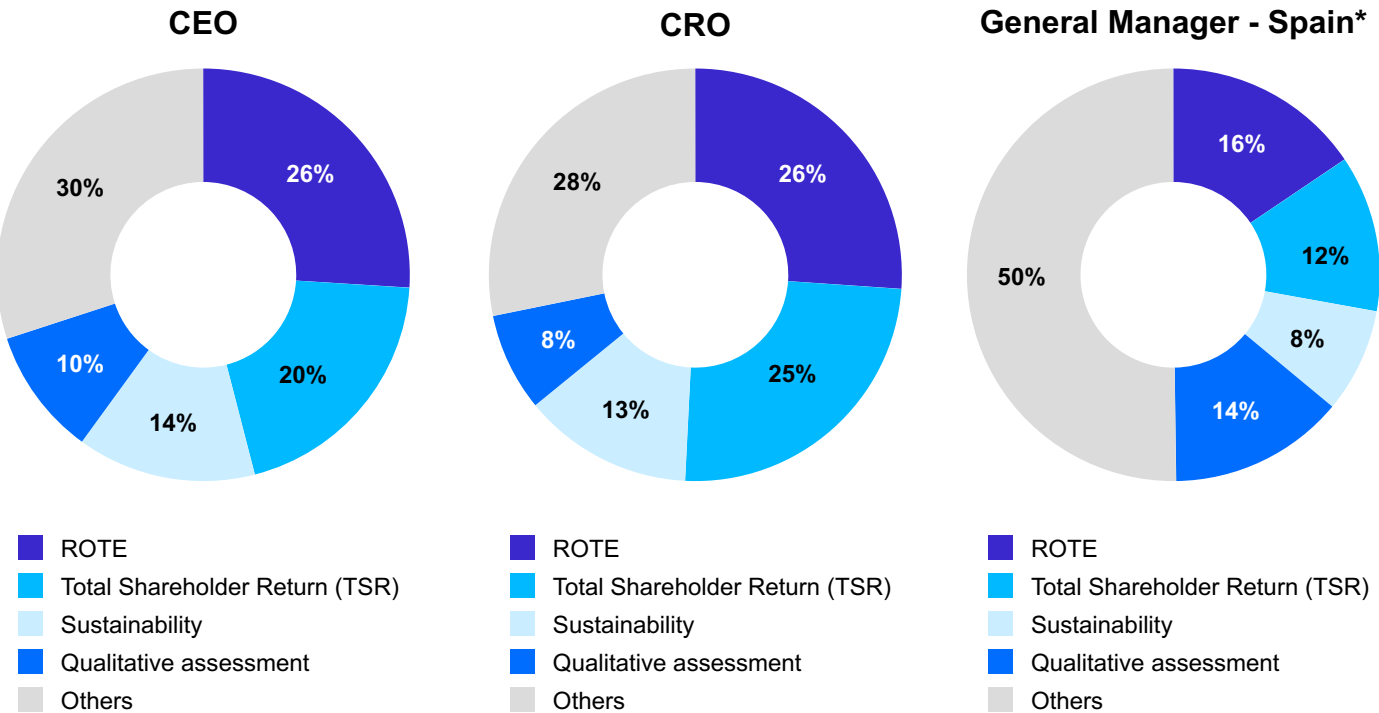
(sustainable financing) has a proportionally greater impact, while continuing to give importance to the social dimension (gender diversity).

In short, this multi-year sustainability indicator (ISos) links directors' long-term variable remuneration to specific targets in the environmental (growth in sustainable financing) and social (greater gender diversity in leadership) dimensions.

Attainment scale:

An attainment scale is defined for the Sustainable Business indicator based on accumulated objectives for 2026-2028 and another scale is defined for the percentage of Women in the management team.

C.3.) Proportion of total variable remuneration with respect to target metrics



* In the case of the General Manager - Spain, this proportion takes account only of the indicators already set in the Group's annual and multi-year objectives. This proportion may be updated once the final objectives have been approved, at which point the functional objectives (currently in the "Others" category) will be incorporated.

D) Long-term remuneration 2024-2026 and 2025-2027

The indicators of the long-term remuneration plans in force and covering the year 2026, which, like the one corresponding to the period 2026-2028, are based on the attainment of annual and multi-year (3 years) objectives, where a reference amount for the long-term remuneration (amount to be received in the event of 100% attainment of both annual and multi-year objectives) is established at the beginning of the cycle, are summarized below.

The amounts established for each of these two plans are detailed in [section 2.1.1.C](#)).

Objective	2024-2026	2025-2027
Total Shareholder Return (TSR)	40%	40%
Return on Tangible Equity (ROTE)	40%	40%
Sustainability	20%	20%

Relative Total Shareholder Return (Relative TSR)

Definition:

A metric of the shareholders' total return on investment. TSR is taken to be the sum of the dividends paid and the share price appreciation, taken as the difference between the arithmetic mean of the closing price of the share, rounded to the third decimal place, in the 20 sessions preceding the beginning date and the last 20 sessions of the year in which the end date falls. For these purposes, the beginning and end dates are as follows:

Long-term remuneration	2024-2026	2025-2027
Beginning date	1 January 2024	1 January 2025
End date	31 December 2026	31 December 2027

Banco Sabadell's TSR will be compared with that of the following peer group in the 2024-2026 plan:

Peer group 2024-2026

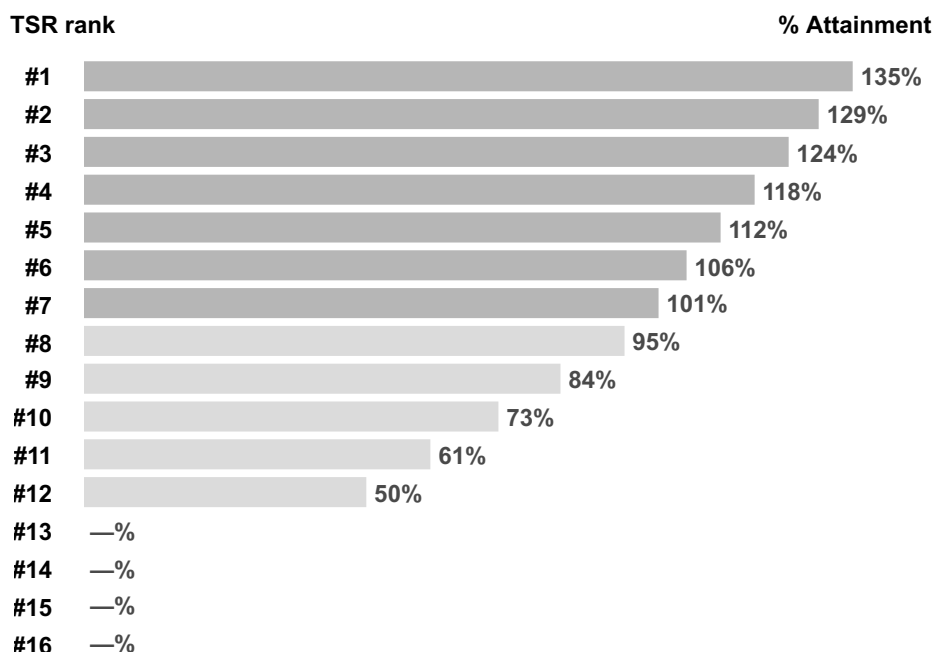
ABN AMRO Group NV	Caixabank S.A.	Raiffeisen
Banco Bpm SpA	Erste Group	Skandinaviska Enskilda Banken AB
Bankinter S.A.	Intesa Sanpaolo SpA	Standard Chartered Bank
BBVA, S.A.	KBC Groep NV	Swedbank AB
BPER Banca, SpA	Mediobanca	Virgin Money

For the 2025-202XXX plan, Banco Sabadell's TSR will be compared with that of the following companies (peer group):

Peer group 2025-2027

ABN AMRO Group NV	Caixabank S.A.	Raiffeisen
Banco Bpm SpA	Erste Group	Skandinaviska Enskilda Banken AB
Bankinter S.A.	Intesa Sanpaolo SpA	Standard Chartered Bank
BBVA, S.A.	KBC Groep NV	Swedbank AB
BPER Banca, SpA	Mediobanca	Commerzbank AG

Attainment scale



Return on Tangible Equity (ROTE) for both plans

Definition:

ROTE in each plan is determined as the average of the values obtained in the month of December during the measurement period (2024-2026 and 2025-2027).

Attainment scale:

The following attainment scale is defined:

2024-2026	0 %	50 %	100 %	150 %
	<11%	>11%	12% - 13%	>14%

2025-2027	0 %	50 %	100 %	150 %
	<13 %	>13 %	14 % - 15 %	>16 %

Attainment is increased on a straight-line basis for attainment between 50% and 100% and between 100% and 150%.

Sustainability (set for 2024-2026)

Definition:

A synthetic indicator related to sustainable business (green finance, sustainability-linked finance, and other finance) and Diversity (% women in the management team).

Attainment scale:

An attainment scale is defined for the Sustainable Finance indicator based on accumulated objectives for 2024-2026 and another scale is defined for the percentage of Women in the management team.

Sustainability (set for 2025-2027)

Definition:

A synthetic indicator related to sustainable business (green finance, sustainability-linked finance, and other finance) and Diversity (% women in the management team).

Attainment scale:

An attainment scale is defined for the Sustainable Business indicator based on accumulated objectives for 2025-2027 and another scale is defined for the % of Women in the management team.

D.1.) Prudential adjustments for attainment of objectives

A risk-related correction factor will be applied that includes indicators relating to capital (CET1 and MREL) and liquidity (Liquidity Coverage Ratio), and attainment adjustments. Breach of the tolerance threshold in the RAS for liquidity or capital adequacy result in the long-term remuneration being reduced to zero.

D.2.) Ex-ante risk adjustments

The ex-ante risk adjustments described in [section 3.1.2.B](#)) for short-term variable remuneration are also applicable to long-term remuneration.

D.3.) Payment procedure

This remuneration is deferred and paid in equity instruments, in accordance with the applicable regulations and the Remuneration Policy. The following table shows the calendar for payment of the long-term remuneration for 2023, 2024 and 2025:

Long-term remuneration	Annual measurement year	Multi-year measurement period	1st payment* (60%)	2nd payment* (20%)	3rd payment* (20%)
2024	2024	2024 2026	2028	2029	2030
2025	2025	2025 2027	2029	2030	2031
2026	2026	2026 2028	2030	2031	2032

* Since the adjusted reference amount is determined 45% in cash and the remaining 55% in Banco Sabadell shares, each payment of the long-term remuneration will be made in the same proportion. The shares that are delivered are subject to lock-up as described in [section 3.1.2.B](#)) on short-term variable remuneration.

3.1.3. Contractual conditions for executive directors, including termination indemnities

The executive directors' contracts are standard Senior Management contracts and meet the legal requirements for contracts of this type, with the following terms and conditions:

- **Duration:** the contracts are indefinite.
- **Fixed remuneration:** the contracts provide for the payment of fixed remuneration to executive directors under the terms and conditions detailed above.
- **Variable remuneration:** the contracts provide for the payment of variable remuneration to executive directors under the terms and conditions detailed above.
- **Retirement and savings plans:** the contracts provide for executive directors to participate in pension and saving schemes, under the terms and conditions detailed above.
- **Benefits:** the executive directors' contracts provide for them to enjoy the benefits and flexible remuneration schemes that the Bank has established for its other employees, in the same terms as the latter.
- **Confidentiality:** the contracts include a confidentiality clause that obliges directors not to disclose, either during the term of the contract or thereafter, any confidential data, procedures, methods, information, or commercial or industrial data referring to the Bank's business or finances.
- **Restitution and use of company assets:** all material goods, information media, files, documentation, manuals, etc. that the directors have in their possession must be returned to the Bank at the time of termination of the contract.
- **Clawback and Malus clauses:** the contracts contain clauses of both types that apply in the cases defined in the Director Remuneration Policy, as described in [section 3.1.2.B](#)).
- **Early termination and non-competition:**
The contract of the Chief Executive Officer (Mr. César González-Bueno) contains a post-contractual non-competition clause of two years' duration providing two years' fixed remuneration, including the portion of annual contributions to pension plans that are not classified as discretionary pension benefits, in the event of the Chief Executive Officer's termination due to (i) a decision by the Bank, without this being due to a breach of the Chief Executive Officer's duties, or (ii) a change of control; and a non-competition clause of one year's fixed remuneration and one year's duration for all other cases. The application of this non-competition clause is limited geographically to Spain, the United Kingdom and Mexico, where the Bank's main activity is concentrated.

In accordance with this clause, and following the replacement of Mr César González-Bueno as Chief Executive Officer of Banco Sabadell, at a meeting on 5 February 2026 the Board of Directors approved the application of the non-competition clause with effect from the date of his effective termination.

The CRO's contract contains a post-contractual non-competition clause with a duration of two years, applicable at most up to the first date of ordinary retirement, providing for two years' fixed remuneration.

The contract of the Chief Executive Officer (Mr. Marc Armengol Dulcet) contains a post-contractual non-competition clause of two years' duration providing two years' fixed remuneration in the event of the Chief Executive Officer's termination due to (i) a decision by the Bank, without this being due to a breach of the Chief Executive Officer's duties, or (ii) a change of control; and a non-competition clause of one year's fixed remuneration and one year's duration in the event of termination at the request of the Chief Executive Officer.



The application of that non-competition clause is limited geographically to Spain, the United Kingdom and Mexico, where the Bank's main activity is concentrated.

The General Manager - Spain's contract contains a clause entitling him, in the event of early termination of his contract (other than as a result of disciplinary dismissal, retirement, incapacity or voluntary resignation), to receive the mandatory compensation to which he would be entitled under labour regulations, plus an amount, calculated according to a predefined generic formula, of twice the amount of his annual fixed remuneration. He will also be entitled to receive that amount in the event of a change of control.

They do not contain any of the other clauses set out in article 249.4 in connection with article 529.1 *octodecies* of the Capital Companies Law.

3.2. Remuneration for Directors for their functions as members of the Board of Directors

3.2.1. Remuneration Policy

In accordance with the Director Remuneration Policy applicable in 2026, the overall maximum limit of remuneration for directors for their duties as members of the Board of Directors, pursuant to the provisions of the Articles of Association of Banco Sabadell, is €5 million per year. This maximum limit includes the additional remuneration for the Chairman for non-executive functions. The remuneration is set each year within this limit by the Board of Directors subject to a favourable report from the Remuneration Committee.

The directors' remuneration for 2026 was determined on the basis of the reports on director remuneration in Spain published by Spencer Stuart.

Directors' remuneration in 2026 for membership of the Board of Directors is broken down as follows:

- Fixed remuneration for belonging to the Board of Directors.
- Attendance fees, for at most 11 ordinary meetings, with the possibility of collecting attendance fees for at most two meetings that they miss for justified reasons provided that they grant proxy in those cases. No amounts are payable for attendance at extraordinary meetings of the Board of Directors.
- The Chairman receives additional fixed remuneration for performing his duties as Chairman of the Bank, of the Board of Directors and of the General Meeting of Shareholders, for acting as the Bank's highest representative, and for the special dedication involved in performing the duties of Chairman under the terms established in the Capital Companies Law, in the Articles of Association and by the Board of Directors in a group such as Banco Sabadell. Due to the organic or representative nature of these functions, they cannot be classified as executive functions but they require a considerable degree of dedication of a much greater intensity than that of the other non-executive members of the Board of Directors.
- Additional amounts for performing the functions of Deputy Chairman or Lead Independent Director, and for chairing or being a member of Board Committees.

Non-executive directors do not qualify for the remuneration or benefits that apply to Bank personnel, the Group's Identified Staff or

Senior Management, and they are not members of the retirement and savings or variable and long-term remuneration systems.

3.2.2. Projected remuneration

In accordance with the power granted to the Board of Directors by the Director Remuneration Policy, and based on the review of the remuneration model and the amounts for the Board and its Committees in relation to market practices, the remuneration specified in the following table was approved on 5 February 2026:

(thousand euro)	2026 remuneration	Attendance fees 2026 (per meeting)
Members	100	2
Additionally:		
Chairman	1,500	
Deputy Chairman	107	
Lead Independent Director	22	

Non-executive directors also receive remuneration for chairing or being members of Board Committees.

Committee (thousand euro)	Position	Amount
Strategy and Sustainability Committee	Chairman	—
	Member	40
Credit Delegated Committee	Chairman	70
	Member	40
Audit and Control Committee	Chairman	70
	Member	40
Appointments and Corporate Governance Committee	Chairman	50
	Member	30
Remuneration Committee	Chairman	50
	Member	30
Risk Committee	Chairman	70
	Member	40

Mr. Luis Deulofeu Fuguet will collect at most €30,000 as an ordinary member of the Board of Directors of Sabadell Digital S.A.U.

Ms. Mireya Giné Torrens will collect €30,000 as an ordinary member of the Board of Directors of Sabadell Consumer Finance, S.A.

It is not envisaged that the non-executive directors will collect any other supplementary remuneration from the Institution or any other Group institution in 2026 as consideration for services rendered other than those inherent to their position, or any other remuneration items such as advances, loans or guarantees, or any other additional remuneration not disclosed in this Annual Report on Director Remuneration.

Both Mr. Josep Oliu Creus, the Chairman, and Ms. María José García Beato, a director, will continue to receive the deferred amounts of short- and long-term variable remuneration accrued while they performed executive duties.

3.2.3. Contractual conditions

With the exception of the Chairman, non-executive directors are not under contract to the Bank by virtue of their status as members of the Board of Directors, and none of them are entitled to indemnities or have non-compete clauses for the event of termination of their position as director.

As established in the Articles of Association of Banco de Sabadell, S.A., the Chairman is the highest representative of the Bank and has the rights and obligations inherent to that position, including the power to sign on behalf of the company. In discharging his duties, the Chairman of the Board of Directors is the person with primary responsibility for the effectiveness of the Board of Directors and, as such, represents the Bank in any event, and signs on behalf of the company; he convenes and chairs meetings of the Board of Directors, setting the agenda, directing the debates and deliberations within the Board of Directors, and taking responsibility for executing the decisions adopted by the Board of Directors.

Due to the scope and special nature of his duties, the Chairman's contract as a non-executive director provides for fixed remuneration in addition to that corresponding to his membership of the Board.





4. Procedures and bodies involved in determining and approving the Remuneration Policy

4.1. General framework

The Articles of Association of Banco Sabadell set out the competencies of the Board of Directors and its Committees. The Board of Directors Regulation sets out the terms of reference for the Board of Directors and its Committees, establishing their powers and basic rules of functioning and organization, in line with the regulations applicable to listed companies and credit institutions, as implemented and complemented in the terms of reference of the Board Committees. The Articles of Association and the Regulation of the Board of Directors of Banco Sabadell and of its Committees are available on the Banco Sabadell corporate website.

In accordance with the provisions of the Capital Companies Law, the Board of Directors is vested with the non-delegable power to determine the company's general policies and strategies and to make decisions regarding the remuneration of the Directors, within the framework of the Articles of Association and of any Director Remuneration Policy.

The Remuneration Committee is entrusted with making proposals to the Board of Directors regarding the Director Remuneration Policy and the individual remuneration and other contractual conditions of the executive directors, and with overseeing compliance, in accordance with the Regulation of the Board of Directors and of the committee itself.

The Remuneration Committee also has at least the following basic responsibilities as set out in article 18 of the Regulation of the Board of Directors and elaborated upon in the Regulation of the Remuneration Committee:

- a) Proposing the Director Remuneration Policy to the Board of Directors.
- b) Proposing, to the Board of Directors, the Remuneration Policy for general managers and others performing Senior Management functions who report directly to the Board of Directors, the Delegated Committee or the CEOs, and the individual remuneration and other contractual conditions for executive directors, exercising oversight to ensure that they are complied with.
- c) Regularly reviewing Remuneration Policy.
- d) Advising on remuneration programmes based on shares and/or options.
- e) Periodically reviewing the general principles of remuneration and the remuneration programmes for all employees, and considering whether they conform to those principles.
- f) Ensuring transparency of remuneration.
- g) Ensuring that potential conflicts of interest do not impair the independence of external advice.
- h) Verifying the information on remuneration contained in the various corporate documents, including the Report on Director Remuneration.



The Remuneration Committee complies with the principles, good practices and criteria for its proper functioning established by Technical Guide 1/2019 on appointments and remuneration Committees, dated February 20, published by the Spanish National Securities Market Commission.

In accordance with the provisions of article 67 of the Articles of Association, at the end of 2025 Banco Sabadell's Remuneration Committee comprised four non-executive directors, all of whom are independent directors, as follows:

Name	Position
Ms. Mireya Giné Torrens	Chairman
Ms. Ana Colonques García-Planas	Member
Ms. Margarita Salvans Puigbò	Member
Mr. Gonzalo Baretino Coloma	Non-member secretary

In accordance with Article 19 of the Board Regulation and with its own terms of reference, the Risk Committee is responsible for informing the Remuneration Committee as to whether the employee remuneration programmes are coherent with the Group's risk, capital and liquidity.

In accordance with Article 16 of the Board Regulation and with its own terms of reference, the Audit and Control Committee supervises the process of drafting and presenting the regulated financial and non-financial information, including that related to remuneration, and checks compliance with the law and the proper application of accounting standards. In particular, an annual audit of the Remuneration Policy is performed whose conclusions are submitted to the Remuneration Committee.

Proposals by the Remuneration Committee are submitted to the Board of Directors for consideration and, where appropriate, approval.

In accordance with the Director Remuneration Policy in force and within the limits established therein, on 5 February 2026 the Board of Directors determined the amount of remuneration for directors for the current year. Specifically, it determined the remuneration corresponding to the Chairman during the year and that of the other directors in their capacity as members of the Board of Directors. It also determined the remuneration corresponding to the executive directors for performance of executive functions, as detailed in the related sections above.

Several divisions of the Bank participate in the application and oversight of the Remuneration Policy. They include the People and Sustainability Division, which produces an annual report on remuneration whose purpose is to provide the Remuneration Committee with basic information to enable it to perform the functions entrusted to it in connection with the review of the general principles of the Banco Sabadell Remuneration Policy and oversight of the remuneration for executive directors, senior management and the other persons who, because of their responsibility, risk-taking capacity and remuneration status, form part of the Group's Identified Staff, in accordance with the provisions of Law 10/2014 and Delegated Regulation 923/2021/EU.

4.2. Remuneration benchmarking and external advisers

In addition to obtaining assistance from the Bank's divisions, the Remuneration Committee consults with Willis Towers Watson, a specialized firm that assists the Committee in identifying market trends and regulatory developments in connection with remuneration; it also consults with EY People Advisory Services, a firm that is specialized in the implementation of integrated business strategies. Mercer Consulting S.L., a specialized consulting firm, issued an independent assessment on the implementation of the Remuneration Policy that is applicable to the members of the Identified Staff and on the Director Remuneration Policy; it concluded that the policies were being applied properly; that report was submitted to the Risk Committee and the Remuneration Committee in January 2026.

Additionally, with a view to establishing a remuneration policy that is consistent with comparable companies, each year Banco Sabadell uses the Spencer Stuart Board Index 2024 as well as advice from consulting firm Willis Towers Watson to perform a comparative analysis of the remuneration for the Board of Directors, members of senior management and other members of the Identified Staff with respect to the market.

The CEO's remuneration for 2026 was benchmarked against two groups of companies. As detailed in the following table, the first peer group is composed of 14 banks from Spain and other European countries (the international benchmark), while the second peer group is made up of 13 Spanish companies, most of them in the IBEX-35 (the domestic benchmark).

The CEO's total remuneration for 2026 is in the 74th percentile of the international peer group and the 50th percentile of the domestic peer group.

Companies used as benchmark

Banks in the international benchmark 		Companies in the domestic benchmark 	
Banco BPM	Intesa San Paolo	Abanca	Endesa
Bankinter	KBC Group	Amadeus	Ferrovial
BBVA	Skandinaviska Enskilda Banken	Bankinter	Fluidra
BPER Banca	Standard Chartered Bank	BBVA	Inmobiliaria Colonial
Caixabank	Raiffeisen	Caixabank	Mapfre
Commerzbank AG	Swedbank	Cellnex	Merlin Properties
Erste Group	ABN AMRO	Enagás	

The CRO's remuneration was established on the basis of information on comparable positions in the group of European and Spanish companies indicated above, and it is above the 58th percentile of the domestic peer group.



5. Measures to reduce exposure to excessive risks and contribute to sustainable performance

The Banco Sabadell Remuneration Policy is aligned with the shareholders' interests, the Banco Sabadell Group strategy and the creation of long-term value, while promoting appropriate risk management.

Without prejudice to the oversight exercised by the Bank's Board of Directors and its Committees and the Bank's divisions (described in [section 4](#) of this Report), the Director Remuneration Policy incorporates a number of elements that reduce exposure to excessive risk-taking, many of which were described above. Those elements also apply to professionals who have a material impact on the Bank's risk profile (the Identified Staff).

The main elements of the Remuneration Policy that reduce exposure to excessive risk-taking and align remuneration with the Bank's objectives, values and long-term interests are listed below.

Objectives established in variable remuneration

The Group's corporate objectives established with respect to short-term variable remuneration in 2025 and 2026 measure the Bank's prudential performance from both a financial and non-financial perspective. In 2025, 65% of the objectives are linked to financial metrics related to profitability (ROTE), results (net profit, net interest income plus fees and commissions), expense control (Group expenses), and asset quality (cost of risk, NPA volume, % coverage). The remaining 35% is linked to non-financial parameters that are fundamental to value creation by the Group, such as the availability of the Group's customer services and employee satisfaction (quality of service) and the improvement in its scores in the main ESG indexes, the sustainable finance plan, diversity and environment (sustainability), and the market share target.

In 2026, the weighting of financial objectives has been increased to 70%, while that of non-financial objectives has been reduced to 30%. The financial metrics include profitability (ROTE), results (net profit, net interest income plus fees and commissions), expense control (Group expenses), asset quality (cost of risk, NPA volume, % coverage) and, as a new feature, a Capital Generation indicator linked to the change in the CET1 ratio in the year plus the dividends accrued in the year. The non-financial metrics are unchanged: availability of the Group's customer services, employee satisfaction, improvement in the main ESG indexes, the sustainable finance plan, diversity and environment (Sustainability), and the market share target.

In addition, taking into account the functions performed by the CRO, in accordance with the regulations applicable to credit institutions, it has been established that the Group's objectives should be limited to 25% in his particular case, leaving the remaining 75% linked to individual objectives in 2026.

In long-term remuneration, it is necessary to meet not only the annual objectives established for short-term variable remuneration but also the multi-year objectives linked to the creation of shareholder value (relative TSR), profitability (ROTE), sustainability (synthetic ESG indicator) and the new capital generation indicator. The latter consists of the variation in the CET1 ratio in the period 2026-2028 plus accrued

dividends, as well as the percentage of CMP based on Banco Sabadell's position in this metric within the peer group at the end of the measurement period (2028).

Adjustments for attainment of objectives

As discussed above, both short-term and long-term remuneration are subject to a risk-related correction factor that includes indicators relating to capital (CET1 and MREL) and liquidity (Liquidity Coverage Ratio) in connection with the limits set by the RAS. Failure to attain any of these indicators will result in a reduction of the remuneration.

Moreover, no short-term variable remuneration or long-term remuneration is accrued if overall attainment of objectives (mix of Group and individual objectives) is less than 60%.

In addition, there are prudential mechanisms for adjusting the individual attainment, based on exceedance of expected loss thresholds in terms of operational risk and/or internal control indicators.

Ex-ante risk adjustments

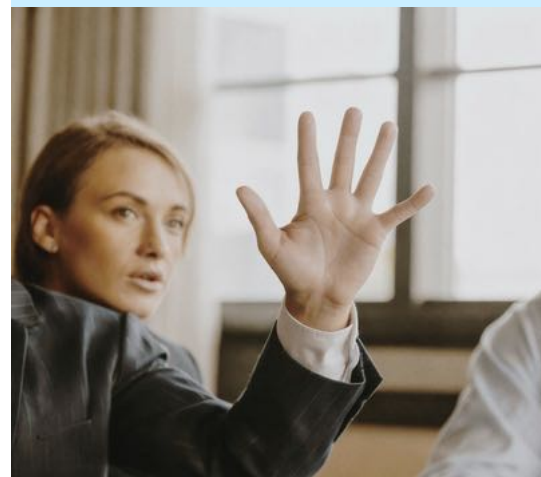
The total amount of any variable remuneration item is subject to downward adjustment at the discretion of the Board of Directors based on a recommendation by the Remuneration Committee, and may even be reduced to zero on the basis of the parameters described in [section 3.1.2.B](#)), which include:

- Risk and control factors such as breaches of standards and regulations, breach of risk limits e.g., RAS (capital adequacy, liquidity) or breach of expected loss thresholds in terms of operational risk, and/or internal control indicators (e.g. results of internal audits) and similar items.
- Maximum Distributable Amount (MDA) that is below the threshold required by regulation.
- The executive directors' variable remuneration for 2026 incorporates an automatic adjustment mechanism. Under this mechanism, accrual of variable remuneration is contingent on attainment of thresholds for attributable net profit and the CET1 capital ratio that will be defined each year by the Board of Directors.

If net profit and the CET1 ratio do not reach those thresholds, there will be no entitlement to annual variable remuneration. This mechanism ensures that variable remuneration is aligned with the Bank's financial strength and stability, ensuring that payments linked to its overall performance are only made when the established profitability and solvency requirements are met.

The purpose of this adjustment is to strengthen the link between variable remuneration and the ability to generate sustainable profits and maintain adequate capital, thereby contributing to prudent risk management and the long-term sustainability of the Banco Sabadell Group.

Taking the above into account, the final amount of the short-term variable remuneration accrued annually (subject to ex-post adjustments) will be determined by the Board of Directors, following a recommendation by the Remuneration Committee, based on the individual assigned short-term and/or long-term variable remuneration, evaluation of the degree of attainment of individual performance objectives assigned to the executive directors, and application of the variable remuneration adjustment.



Deferral and payment

Short-term variable remuneration is deferred as follows:

- Deferral over at least five years for executive directors and other members of Senior Management and at least four years for the rest of the Identified Staff.
- Deferral of at least 60% in the case of executive directors and of the members of the Identified Staff whose variable remuneration exceeds €1,500,000, and 40% for the other members of the Identified Staff.
- The deferred remuneration is paid 55% in the form of Banco Sabadell shares in the case of executive directors and other members of Senior Management, and at least 50% in the case of the rest of the Identified Staff.
- Variable remuneration paid in shares is subject to one-year lock-up. In line with recommendation 62 of the Code of Good Governance, unless executive directors own shares amounting to the equivalent of twice their fixed annual remuneration, they may not dispose of the shares they receive until at least three years have elapsed from the time of delivery. The above condition will not apply to any shares that the Director must dispose of to cover tax obligations related to their delivery.
- The use of personal hedging strategies or any mechanism that guarantees receipt of part or all of the variable remuneration is not permitted.

The specific payment schedule for the 2025 and 2026 short-term variable remuneration can be found in [sections 2.1.1.B](#)) and 3.1.2.B), respectively.

Deferred variable annual remuneration is also paid 55% in the form of shares in the case of executive directors, other members of senior management and the Identified Staff. The time horizon for measurement of the annual objectives that determine the adjusted reference amount up to the last payment date is 5 years, excluding the lock-up period applicable to any shares delivered. The payment schedules for long-term remuneration in force in 2025 and 2026 are shown in [sections 2.1.1.C](#)), [3.1.2.C](#)) and [D](#)).

Malus and clawback clauses

Short-term variable remuneration and long-term remuneration that has not yet been collected (up to 100% of the amount) may be reduced or cancelled (malus clauses) and amounts collected may have to be refunded (clawback clauses) in the event of poor financial performance by the Bank as a whole or by a specific division or area or by the exposures generated by the executive director to whom they are applicable. It is not necessary for there to be malice or negligence in order for these clauses to apply. For these purposes, the performance assessment will be compared with subsequent performance of the variables that contributed to achieving the objectives. The factors described in [section 3.1.2.B](#)) will be taken into account.

Oversight by governing bodies and divisions of the Institution

Without prejudice to the functions described above and those corresponding to the Institution's Remuneration Committee and Board of Directors, the functions of other governing and management bodies of the Institution entrusted with oversight over remuneration are listed below:

- The Risk Committee checks to ensure that employee remuneration programmes are coherent with the Bank's risk, capital and liquidity, and provides advice in this respect to the Remuneration Committee.
- The Audit and Control Committee supervises the process of drafting and presenting the regulated financial information, including that relating to remuneration, and reviews compliance with the regulatory requirements and proper application of accounting standards.
- The Internal Audit Division, within the framework of its functions, carries out an independent examination, at least once per year, of the definition and application of the Institution's Remuneration Policy and its effects on its risk profile, and the way in which these effects are managed. Additionally, the Prudential Review of Remuneration produced by specialized firm Mercer Consulting, S.L. for the Risk Committee and Remuneration Committee assesses and guarantees that the delimitation of the Institution's Identified Staff and the remuneration practices and policies conform to the requirements established in the regulations and guidelines of the EBA and the Bank of Spain.
- Each year, the CRO submits to the Remuneration Committee a proposal for the adjustment of the variable remuneration, which may be at Group, unit, country or even individual level, to be made at the end of the year, depending on the risk profile and earnings performance.

This Annual Report on Director Remuneration was approved by Banco Sabadell's Board of Directors at a meeting on:

19/02/2026

No Directors abstained or voted against the adoption of this Report.

The English versions of this report and its statistical annex are translations of the originals in Spanish and are provided for information purposes only. In the event of a discrepancy, the original versions in Spanish shall prevail.



6. Reconciliation with the CNMV Annual Report on Remuneration of Directors of Listed Companies

Below is a table of equivalences detailing the location, in this Report, of the content established in the official CNMV format of the Report on Remuneration of Directors of Listed Companies, approved by Circular 3/2021.

**Banco Sabadell Annual
Report on Director
Remuneration**

Content of the form per Circular 3/2021

A. Company's Remuneration Policy for the current financial year

A.1.1.

Describe the current Director Remuneration Policy applicable to the current year. To the extent relevant, include disclosures relating to the Remuneration Policy approved by the General Meeting of Shareholders, provided that these references are clear, specific and concrete.

Sections 1, 2 & 4

Describe the specific decisions by the Board that apply to this year, relating to both Directors' remuneration for their functions as such and for executive functions, as provided in the contracts signed with the executive directors, and to the general Remuneration Policy approved by the General Meeting of Shareholders.

In any event, the following should be disclosed:

- a)** Description of the company's procedures and the bodies involved in determining, approving and applying the Remuneration Policy and its terms and conditions.
- b)** Indicate whether the company's Remuneration Policy was benchmarked against other companies and, if so, give details.
- c)** Disclose whether any external advisors were involved in this process and, if so, identify them.
- d)** Procedures contemplated in the current Director Remuneration Policy for applying temporary exceptions to the policy, conditions under which such exceptions may be used, and components that may be subject to exception under the policy.

A.1.2.

Proportion between variable remuneration and fixed remuneration (remuneration mix) and the criteria and objectives used to determine and ensure an appropriate balance between the fixed and variable components of remuneration. In particular, state the actions adopted by the company in relation to the remuneration system to reduce exposure to excessive risks and adjust it to the company's long-term objectives, values and interests, including references to any measures to guarantee that the company's long-term results are taken into account in the Remuneration Policy, the measures adopted in relation to those categories of staff whose work has a material impact on the company's risk profile and any measures to avoid conflicts of interest. Also disclose if the company has established a period for the accrual or vesting of certain variable remuneration items, whether in cash, shares or other financial instruments, any period of deferral of the payment of amounts or the delivery of accrued or vested financial instruments, any clause that reduces the unvested deferred remuneration or that obliges the Director to refund remuneration already received, where such remuneration was based on figures that have been clearly shown to be inaccurate.

[Sections 2.1 & 5](#)

— Amount and nature of fixed components that are to be accrued by Directors during the year for membership of the Board of Directors per se.

[Section 3.2](#)

— Amount and nature of fixed components that are to be accrued during the year for the performance of Senior Management functions by executive directors.

[Section 3.1](#)

— Amount and nature of any component of remuneration in kind that will accrue during the year, including, but not limited to, insurance premiums paid in favour of the Director.

[Section 3.1](#)

— Amount and nature of variable components, differentiating between short and long term. Financial and non-financial parameters, including social, environmental and climate change, parameters selected to determine variable remuneration in the current year, describing the extent to which these parameters are related to performance, both of the Director and of the company, together with their risk profile, and the methodology, necessary period and the techniques established to determine the degree of compliance with the parameters used in the design of the variable remuneration at the end of the year, describing in detail the criteria and factors applied in terms of the time required and methods for verifying that the performance conditions or any other type of conditions to which the accrual and vesting of each component of variable remuneration was linked were actually fulfilled. State the range, in monetary terms, of the variable components according to the degree of attainment of the objectives and established parameters, and whether there is an absolute monetary cap.

[Sections 3.1 & 5](#)

— Main characteristics of long-term savings systems. Among other information, state the contingencies covered by the system, whether it is defined-contribution or defined-benefit, the annual contribution to be made to the defined-contribution system, the benefits Directors are entitled to under defined-benefit systems, the conditions under which economic rights vest for Directors and their compatibility with any other type of payment or severance pay as a result of the early termination or dismissal of the Director, or deriving from the termination of the contractual relation, in the terms provided, between the company and the Director.

[Section 3.1](#)

State if the accrual or vesting of any of the long-term savings plans is linked to achieving certain objectives or parameters related to the Director's short- or long-term performance.

— Any type of payment or termination indemnity for early termination or dismissal of the Director, or deriving from the termination of the contractual relationship between the company and the Director, in the terms provided, whether by voluntary resignation by the Director or dismissal of the Director by the company, as well as any type of agreement, such as exclusivity, post-contractual non-competition, permanence or loyalty, which entitle the Director to any type of remuneration.

[Section 3.1](#)

- Describe the conditions with which contracts with executive directors for performing Senior Management functions must comply. Among other aspects, give information on the term, limits to the amounts of indemnity, permanence clauses, notice periods and payments in lieu of notice, and any other clauses regarding hiring bonuses, as well as severance payments or golden handshakes for early cancellation or termination of the contractual relationship between the company and the executive director. Include, among others, any non-compete, exclusivity, permanence and loyalty, and post-contractual non-competition pacts or agreements, except where they have already been disclosed in the previous section. Section 3.1
- The nature and estimated amount of any other supplementary remuneration accrued by Directors in the year as consideration for services rendered other than those inherent to their position as Directors. Sections 3.1 & 3.2
- Other remuneration items, such as those arising from the company granting the Director advance payments, loans, guarantees or any other remuneration. Sections 2.1 & 3.1
- The nature and estimated amount of any other planned supplementary remuneration that is not disclosed in the preceding sections, whether paid by the institution or by another institution in the Group, which will be accrued by Directors during the current year. Sections 2.1 & 3.1

A.2.

Describe any material change in the Remuneration Policy applicable in the current year resulting from:

Sections 1 & 3

- A new policy or an amendment of the policy already approved by the General Meeting of Shareholders.
- Material changes in the specific determinations established by the Board for the current year regarding the Remuneration Policy in force, in comparison with those applied in the previous year.
- Proposals that the Board of Directors has resolved to submit to the General Meeting of Shareholders to which this annual report will be submitted and which are proposed to be applicable to the current year.

A.3.

Identify the direct link to the document where the current company Remuneration Policy is posted, which must be available on the company's website.

Introduction

A.4.

Considering the data provided in Section B.4, describe the outcome of the consultative vote at the General Meeting of Shareholders on the previous year's Annual Report on Remuneration.

Section 2

B. Overall summary of how the Remuneration Policy was applied during the reporting year.

B.1.

Describe the process used to apply the Remuneration Policy and to determine the individual remuneration set out in Section C of this report. This information must include the role played by the Remuneration Committee, the decisions taken by the Board of Directors and the identity and the role of any external advisers engaged for the process of applying the Remuneration Policy in the reporting year.

Section 2

B.1.2.

Describe any departure during the year from the procedure established for applying the Remuneration Policy.

Section 2

B.1.3.

Indicate whether any temporary exceptions were made to the Remuneration Policy and, if so, describe the exceptional circumstances that led to the application of these exceptions, the specific components of the Remuneration Policy that were affected and the reasons why the entity considers that those exceptions were necessary to serve the long-term interests and sustainability of the company as a whole or to ensure its viability. Also quantify the impact that the application of these exceptions had on the remuneration of each Director during the year.

Section 2

B.2.

Detail the actions taken by the company in relation to the remuneration system and how they contributed to reducing exposure to excessive risks and adapting it to the company's long-term objectives, values and interests, including a reference to any measures that have been adopted to ensure that the company's long-term results were taken into consideration in setting the remuneration actually accrued and that a suitable balance was attained between the fixed and variable components of remuneration, any measures adopted in relation to those categories of staff whose professional activities have a material repercussion on the company's risk profile and any measures that have been adopted to avoid conflicts of interest.

[Sections 2.1 & 5](#)

- The nature and estimated amount of any other planned supplementary remuneration that is not disclosed in the preceding sections, whether paid by the institution or by another institution in the Group, which will be accrued by Directors during the current year.

[Sections 2.1 & 3.1](#)

B.3.

Detail how the remuneration that accrued and vested in the year meets the provisions of the current Remuneration Policy and, in particular, how it contributes to the company's long-term sustainable performance. Also, disclose the relationship between the remuneration obtained by the Directors and the company's results or other performance metrics, detailing how any variations in the company's performance influenced changes in Director remuneration, including remuneration accrued but deferred, and how they contribute to the company's short- and long-term results.

[Sections 2.1 & 5](#)

B.4.

Describe the outcome of the consultative vote at the General Meeting of Shareholders on the Annual Report on Remuneration for the previous year, indicating the number of abstentions and votes cast against, blank votes and votes in favour: % of total Votes cast Number as % of votes cast Votes against Votes in favour Blank votes Abstentions Comments

[Section 2](#)

B.5.

Describe how the fixed components of remuneration that were accrued and vested during the year by the Directors in their capacity as such were determined, the proportion allocated to each Director and how they changed with respect to the previous year:

[Section 2.2](#)

B.6.

Describe how the salaries accrued and vested by each of the executive directors in the last year for performing executive functions were determined, and how they changed with respect to the previous year.

[Section 2.1](#)

Describe and give the main features of the variable components of the remuneration systems accrued and vested in the reporting year. In particular:

a) Identify each of the remuneration plans that determined the various types of variable remuneration accrued by each of the Directors in the reporting year, including information on their scope, approval date, implementation date, any vesting conditions, the periods of accrual and validity, the criteria used to assess performance and how this affected the establishment of the variable amount that accrued, as well as the measurement criteria that were applied and the period that must elapse in order to be in a position to suitably measure all the applicable conditions and criteria, and describe in detail the criteria and factors applied in terms of the time required and methods for verifying that the performance conditions or any other type of conditions to which the accrual and vesting of each component of variable remuneration was linked were actually fulfilled.

b) In the case of stock options and other financial instruments, the general characteristics of each plan must contain information on the conditions required both to achieve unconditional ownership (vesting) and to exercise such options or financial instruments, including the strike price and exercise period.

c) Name and category (Executive Director, Proprietary External Director, Independent External Director and Other External Director) of each of the Directors who are beneficiaries of remuneration systems or plans that include variable remuneration.

d) Disclose any accrual, vesting or deferral periods that were applied to the payment of vested amounts and/or any periods of lock-up/non-disposal for shares or other financial instruments.

Describe the short-term variable components of the remuneration systems.
Describe the components.

B.7.

Describe and give the main features of the variable components of the remuneration systems accrued and vested in the reporting year. In particular:

- Identify each of the remuneration plans that determined the various types of variable remuneration accrued by each of the Directors in the reporting year, including information on their scope, approval date, implementation date, any vesting conditions, the periods of accrual and validity, the criteria used to assess performance and how this affected the establishment of the variable amount that accrued, as well as the measurement criteria that were applied and the period that must elapse in order to be in a position to suitably measure all the applicable conditions and criteria, and describe in detail the criteria and factors applied in terms of the time required and methods for verifying that the performance conditions or any other type of conditions to which the accrual and vesting of each component of variable remuneration was linked were actually fulfilled.
- In the case of stock options and other financial instruments, the general characteristics of each plan must contain information on the conditions required both to achieve unconditional ownership (vesting) and to exercise such options or financial instruments, including the strike price and exercise period.
- Name and category (Executive Director, Proprietary External Director, Independent External Director and Other External Director) of each of the directors who are beneficiaries of remuneration systems or plans that include variable remuneration.
- Disclose any accrual, vesting or deferral periods that were applied to the payment of vested amounts and/or any periods of lock-up/non-disposal for shares or other financial instruments.

Sections 2.1 & 5

B.8.

Indicate whether any accrued variable components were reduced or clawed back after deferral of unvested amounts (in the former case) or vesting and payment (in the latter case) on the basis of data which were subsequently shown to be manifestly inaccurate. Describe the amounts reduced or clawed back through the application of the malus or clawback clauses, why they were implemented and the years to which they refer.

Section 2.1

B.9.

Describe the main characteristics of the long-term savings systems where the amount or equivalent annual cost appears in the tables in Section C, including retirement and any other survivorship benefits that are financed, totally or partially, by the company, whether through internal or external contributions, indicating the type of plan, whether it is defined-contribution or defined-benefit, the contingencies covered, the conditions for the economic rights to vest for Directors, and their compatibility with any type of severance pay for early termination or termination of the contractual relationship between the company and the Director.

Section 2.1

B.10.

Describe any termination indemnities or other payments arising from early dismissal or early resignation, or from the termination of the contract, in its own terms, that were accrued and/or received by Directors during the reporting year.

Section 2.1

B.11.

Indicate whether there were any significant changes in the contracts of persons performing Senior Management functions, such as executive directors, and, if so, describe them. Additionally, describe the main conditions of new contracts signed with executive directors during the year, unless already described in Section A.1.

Sections 2.1 & 3.1

B.12.

Describe any additional remuneration paid to Directors for services rendered other than those inherent to their Directorship.

Sections 2.1 & 2.2

B.13.

Describe any remuneration deriving from advance payments, loans or guarantees granted, indicating the interest rate, the main features and any amounts that were repaid, as well as any collateral obligations assumed on their behalf.

Sections 2.1 & 2.2

B.14.

Detail any remuneration in kind accrued by the Directors in the year, briefly indicating the nature of the various salary components.

Section 2.1

B.15.

Describe any remuneration accrued by Directors in the form of payments settled by the listed company with third parties where the Director renders services, where such payments are intended to compensate the Director's services to the company.

Sections 2.1 & 2.2**B.16.**

Describe and detail any items of remuneration accrued under any other remuneration heading not already disclosed above, regardless of their nature or the group company that made the payment, including any remuneration, in any form, that qualifies as a related-party transaction or, in particular, where it has a material impact on the true and fair view of the total remuneration accrued by the Director; it is necessary to describe the amount paid or pending payment, the nature of the consideration received, and any reasons why it was decided that it did not qualify as remuneration for the Director's position as such or as consideration for executive functions, and whether or not it was considered appropriate to report it under amounts accrued under the heading of "Other items" in section C.

Sections 2.1 & 2.2

C. Itemized individual remuneration of each Director

Statistical annex

Section 7

7. Statistical annex

ISSUER IDENTIFICATION DATA

Date of end of reference year: [31/12/2025]

Tax ID number: [A-08000143]

Company name:

[**BANCO DE SABADELL, S.A.**]

Business address:

[AV PZ. DE SANT ROC N.20, (SABADELL) BARCELONA]

B. OVERALL SUMMARY OF HOW THE REMUNERATION POLICY WAS APPLIED DURING THE REPORTING YEAR

B.4. Describe the outcome of the consultative vote at the general meeting on the Annual Remuneration Report for the previous year, indicating the number of votes cast for, against, and blank votes if any:

	Number	% of total
Votes cast	3,785,264	70.28

	Number	% of votes cast
Votes against	698,502	18.45
Votes in favour	3,078,187	81.32
Blank votes		0.00
Abstentions	8,575	0.23

C. ITEMISED INDIVIDUAL REMUNERATION OF EACH DIRECTOR

Name	Category	Accrual period in 2025
Mr. JOSEP OLIU CREUS	Chairman – Other External	From 01/01/2025 to 31/12/2025
Mr. PEDRO FONTANA GARCÍA	Deputy Chairman – Independent	From 01/01/2025 to 31/12/2025
Mr. CÉSAR GONZÁLEZ-BUENO MAYER WITTGENSTEIN	CEO	From 01/01/2025 to 31/12/2025
Ms. AURORA CATÁ SALA	Independent director	From 01/01/2025 to 31/12/2025
Ms. ANA COLONQUES GARCÍA-PLANAS	Independent director	From 01/01/2025 to 31/12/2025
Mr. LLUÍS DEULOFEU FUGUET	Independent director	From 01/01/2025 to 31/12/2025
Ms. MARÍA JOSÉ GARCÍA BEATO	Other external director	From 01/01/2025 to 31/12/2025
Ms. MIREYA GINÉ TORRENS	Independent director	From 01/01/2025 to 31/12/2025
Ms. LAURA GONZÁLEZ MOLERO	Independent director	From 01/01/2025 to 20/03/2025
Ms. MARÍA GLORIA HERNÁNDEZ GARCÍA	Independent director	From 15/05/2025 to 31/12/2025
Mr. GEORGE DONALD JOHNSTON III	Lead independent director	From 01/01/2025 to 31/12/2025
Mr. DAVID MARTÍNEZ GUZMÁN	Proprietary director	From 01/01/2025 to 24/11/2025
Ms. ALICIA REYES REVUELTA	Independent director	From 01/01/2025 to 20/03/2025
Ms. MARGARITA SALVANS PUIGBÒ	Independent director	From 03/06/2025 to 31/12/2025
Mr. MANUEL VALLS MORATÓ	Independent director	From 01/01/2025 to 31/12/2025
Mr. DAVID VEGARA FIGUERAS	Executive director	From 01/01/2025 to 31/12/2025
Mr. PEDRO VIÑOLAS SERRA	Independent director	From 22/06/2025 to 31/12/2025

ANNUAL REPORT ON THE REMUNERATION OF DIRECTORS OF LISTED PUBLIC COMPANIES

C.1. Complete the following tables on the individual remuneration accrued during the year by each of the directors (including remuneration for carrying out executive functions).

a) Remuneration from the reporting company:

i) Remuneration in cash (thousand euro)

Name	Fixed remuneration	Per diems	Remuneration for membership of Board of Directors committees	Wages	Short-term variable remuneration	Long-term variable remuneration	Indemnities	Other items	2025 total	2024 total
Mr. JOSEP OLIU CREUS	1,600	34			19	13			1,666	1,702
Mr. PEDRO FONTANA GARCÍA	207	34	160						401	390
Mr. CÉSAR GONZÁLEZ-BUENO MAYER WITTGENSTEIN	100	34		2,000	400	239		4	2,777	2,283
Ms. AURORA CATÁ SALA	100	34	61						195	190
Ms. ANA COLONQUES GARCÍA-PLANAS	100	34	90						224	123
Mr. LLUÍS DEULOFEU FUGUET	100	34	78						212	200
Ms. MARÍA JOSÉ GARCÍA BEATO	100	34	70			5	44		253	249
Ms. MIREYA GINÉ TORRENS	100	34	84						218	202
Ms. LAURA GONZÁLEZ MOLERO	25	5	10						40	195
Ms. MARÍA GLORIA HERNÁNDEZ GARCÍA	67	25	42						134	
Mr. GEORGE DONALD JOHNSTON III	122	32	94						248	244
Mr. DAVID MARTÍNEZ GUZMÁN	92	29							121	125
Ms. ALICIA REYES REVUELTA	25	5	12						42	200
Ms. MARGARITA SALVANS PUIGBÒ	58	23	35						116	
Mr. MANUEL VALLS MORATÓ	100	34	110						244	235
Mr. DAVID VEGARA FIGUERAS	100	34		691	50	52		2	929	793
Mr. PEDRO VIÑOLAS SERRA	100	34	75						209	205

ii) Table of changes in share-based remuneration schemes and gross profit from vested shares or financial instruments.

Name	Plan	Financial instruments at the beginning of 2025		Financial instruments granted during 2025		Financial instruments that vested in the year				Instruments vested but not exercised	Financial instruments at the end of 2025	
		No. of instruments	No. of equivalent shares	No. of instruments	No. of equivalent shares	No. of instruments	No. of equivalent/ vested shares	Price of vested shares	Gross profit on vested shares or financial instruments (€ '000)	No. of instruments	No. of instruments	No. of equivalent shares
Mr. JOSEP OLIU CREUS	RLP 2021-2023	52,293	52,293			26,146	26,146	3.33	87		26,146	26,146
Mr. JOSEP OLIU CREUS	RV 2021	60,556	60,556			30,278	30,278	3.33	101		30,278	30,278
Mr. CÉSAR GONZÁLEZ-BUENO MAYER WITTGENSTEIN	RLP 2021-2023	209,048	209,048			104,524	104,524	3.33	349		104,524	104,524
Mr. CÉSAR GONZÁLEZ-BUENO MAYER WITTGENSTEIN	RLP 2022-2024	437,928	437,928			262,757	262,757	3.33	876		175,171	75,171
Mr. CÉSAR GONZÁLEZ-BUENO MAYER WITTGENSTEIN	RLP 2023-2025	454,130	454,130					0.00			454,130	454,130
Mr. CÉSAR GONZÁLEZ-BUENO MAYER WITTGENSTEIN	RLP 2024-2026	349,484	349,484					0.00			349,484	349,484
Mr. CÉSAR GONZÁLEZ-BUENO MAYER WITTGENSTEIN	RLP 2025-2027			181,431	181,431			0.00			181,431	181,431
Mr. CÉSAR GONZÁLEZ-BUENO MAYER WITTGENSTEIN	RV 2021	95,026	95,026			47,513	47,513	3.33	158		47,513	47,513

ANNUAL REPORT ON THE REMUNERATION OF DIRECTORS OF LISTED PUBLIC COMPANIES

7	Plan	Financial instruments at the beginning of 2025		Financial instruments granted during 2025		Financial instruments that vested in the year				Instruments vested but not exercised	Financial instruments at the end of 2025	
		No. of instruments	No. of equivalent shares	No. of instruments	No. of equivalent shares	No. of instruments	No. of equivalent/ vested shares	Price of vested shares	Gross profit on vested shares or financial instruments (€ '000)	No. of instruments	No. of instruments	No. of equivalent shares
Mr. CÉSAR GONZÁLEZ-BUENO MAYER WITTGENSTEIN	RV 2022	111,915	111,915			37,305	37,305	3.33	124		74,610	74,610
Mr. CÉSAR GONZÁLEZ-BUENO MAYER WITTGENSTEIN	RV 2023	216,888	216,888			54,222	54,222	3.33	181		162,666	162,666
Mr. CÉSAR GONZÁLEZ-BUENO MAYER WITTGENSTEIN	RV 2024	136,085	136,085			27,217	27,217	3.33	91		108,868	108,868
Mr. CÉSAR GONZÁLEZ-BUENO MAYER WITTGENSTEIN	RV 2025			174,989	174,989	66,034	66,034	3.33	220		108,955	108,955
Ms. MARÍA JOSÉ GARCÍA BEATO	RLP 2020-2022	16,797	16,797			16,797	16,797	3.33	56			
Ms. MARÍA JOSÉ GARCÍA BEATO	INDEMNITY	204,464	204,464			102,232	102,232	3.33	341		102,232	102,232
Mr. DAVID VEGARA FIGUERAS	RLP 2020-2022	21,097	21,097			21,097	21,097	3.33	71			
Mr. DAVID VEGARA FIGUERAS	RLP 2021-2023	42,028	42,028			21,014	21,014	3.33	70		21,014	21,014
Mr. DAVID VEGARA FIGUERAS	RLP 2022-2024	83,625	83,625			50,175	50,175	3.33	167		33,450	33,450
Mr. DAVID VEGARA FIGUERAS	RLP 2023-2025	73,896	73,896					0.00			73,896	73,896

ANNUAL REPORT ON THE REMUNERATION OF DIRECTORS OF LISTED PUBLIC COMPANIES

Name	Plan	Financial instruments at the beginning of 2025		Financial instruments granted during 2025		Financial instruments that vested in the year				Instruments vested but not exercised	Financial instruments at the end of 2025	
		No. of instruments	No. of equivalent shares	No. of instruments	No. of equivalent shares	No. of instruments	No. of equivalent/ vested shares	Price of vested shares	Gross profit on vested shares or financial instruments (€ '000)	No. of instruments	No. of instruments	No. of equivalent shares
Mr. DAVID VEGARA FIGUERAS	RLP 2024-2026	58,567	58,567					0.00			58,567	58,567
Mr. DAVID VEGARA FIGUERAS	RLP 2025-2027			34,706	34,706			0.00			34,706	34,706
Mr. DAVID VEGARA FIGUERAS	RV2021	16,980	16,980			8,490	8,490	3.33	28		8,490	8,490
Mr. DAVID VEGARA FIGUERAS	RV2022	16,281	16,281			5,427	5,427	3.33	18		10,854	10,854
Mr. DAVID VEGARA FIGUERAS	RV2023	25,520	25,520			6,380	6,380	3.33	21		19,140	19,140
Mr. DAVID VEGARA FIGUERAS	RV2024	16,490	16,490			3,298	3,298	3.33	11		13,192	13,192
Mr. DAVID VEGARA FIGUERAS	RV2025			20,477	20,477	7,727	7,727	3.33	26		12,750	12,750

iii) Long-term savings systems.

Name	Remuneration from vesting of rights within savings systems
Mr. CÉSAR GONZÁLEZ- BUENO MAYER WITTGENSTEIN	1
Mr. DAVID VEGARA FIGUERAS	1

ANNUAL REPORT ON THE REMUNERATION OF DIRECTORS OF LISTED PUBLIC COMPANIES

Name	Company's contribution for the year (thousand euro)				Amount of accumulated funds (thousand euro)			
	Saving plans with vested economic rights		Saving plans with unvested economic rights		Saving plans with vested economic rights		Saving plans with unvested economic rights	
	2025	2024	2025	2024	2025	2024	2025	2024
Mr. JOSEP OLIU CREUS							1,661	1,587
Mr. CÉSAR GONZÁLEZ- BUENO MAYER WITTGENSTEIN	1	1	300	300	5	4	1,543	1,213
Ms. MARÍA JOSÉ GARCÍA BEATO					5,102	4,9543	5,133	2,638
Mr. DAVID VEGARA FIGUERAS	1	1	128	110	6	5	757	607

iv) Details of other items

Name	Description	Remuneration amount
Mr. JOSEP OLIU CREUS	REMUNERATION IN KIND	32
Mr. DAVID VEGARA FIGUERAS	REMUNERATION IN KIND	34

b) Remuneration of directors of the listed company for membership of governing bodies of its subsidiaries:

i) Remuneration in cash (thousand euro)

Name	Fixed remuneration	Per diems	Remuneration for membership of Board of Directors committees	Wages	Short-term variable remuneration	Long-term variable remuneration	Indemnities	Other items	2025 total	2024 total
Mr. LLUÍS DEULOFEU FUGUET	30								30	
Ms. MIREYA GINÉ TORRENS	30								30	

ii) Table of changes in share-based remuneration schemes and gross profit from vested shares or financial instruments.

Name	Plan	Financial instruments at the beginning of 2025		Financial instruments granted during 2025		Financial instruments that vested in the year				Instruments vested but not exercised	Financial instruments at the end of 2025	
		No. of instruments	No. of equivalent shares	No. of instruments	No. of equivalent shares	No. of instruments	No. of equivalent/ vested shares	Price of vested shares	Gross profit on vested shares or financial instruments (thousand euro)	No. of instruments	No. of instruments	No. of equivalent shares
Mr. JOSEP OLIU CREUS	Plan							0.00				
Mr. PEDRO FONTANA GARCIA	Plan							0.00				
Mr. CÉSAR GONZÁLEZ-BUENO MAYER WITTGENSTEIN	Plan							0.00				
Ms. AURORA CATÁ SALA	Plan							0.00				
Ms. ANA COLONQUES GARCÍA-PLANAS	Plan							0.00				
Mr. LLUIS DEULOFEU FUGUET	Plan							0.00				
Ms. MARÍA JOSÉ GARCÍA BEATO	Plan							0.00				
Ms. MIREYA GINÉ TORRENS	Plan							0.00				
Ms. LAURA GONZÁLEZ MOLERO	Plan							0.00				
Ms. MARÍA GLORIA HERNÁNDEZ GARCIA	Plan							0.00				
Mr. GEORGE DONALD JOHNSTON III	Plan							0.00				
Mr. DAVID MARTINEZ GUZMÁN	Plan							0.00				
Ms. ALICA REYES REVUELTA	Plan							0.00				
Ms. MARGARITA SALVANS PUIGBÓ	Plan							0.00				
Mr. MANUEL VALLS MORATO	Plan							0.00				
Mr. DAVID VEGARA FIGUERAS:	Plan							0.00				
Mr. PEDRO VIÑOLAS SERRA	Plan							0.00				

iii) Long-term savings systems.

Name	Remuneration from vesting of rights within savings systems
Mr. JOSEP OLIU CREUS	
Mr. PEDRO FONTANA GARCIA	
Mr. CÉSAR GONZÁLEZ-BUENO MAYER WITTGENSTEIN	
Ms. AURORA CATA SALA	
Ms. ANA COLONQUES GARCÍA-PLANAS	
Mr. LLUÍS DEULOFEU FUGUET	
Ms. MARÍA JOSÉ GARCIA BEATO	
Ms. MIREYA GINÉ TORRENS	
Ms. LAURA GONZÁLEZ MOLERO	
Ms. MARÍA GLORIA HERNÁNDEZ GARCÍA	
Mr. GEORGE DONALD JOHNSTON IIII	
Mr. DAVID MARTÍNEZ GUZMÁN	
Ms. ALICIA REYES REVUELTA	
Ms. MARGARITA SALVANS PUIGBÒ	
Mr. MANUEL VALLS MORATÓ	
Mr. DAVID VEGARA FIGUERAS	
Mr. PEDRO VIÑOLAS SERRA	

ANNUAL REPORT ON THE REMUNERATION OF DIRECTORS OF LISTED PUBLIC COMPANIES

Name	Company's contribution for the year (thousand euro)				Amount of accumulated funds (thousand euro)			
	Saving plans with vested economic rights		Saving plans with unvested economic rights		Saving plans with vested economic rights		Saving plans with unvested economic rights	
	2025	2024	2025	2024	2025	2024	2025	2024
Mr. JOSEP OLIU CREUS								
Mr. PEDRO FONTANA GARCÍA								
Mr. CÉSAR GONZÁLEZ-BUENO MAYER WITTGENSTEIN								
Ms. AURORA CATA SALA								
Ms. ANA COLONQUES GARCÍA- PLANAS								
Mr. LLUÍS DEULOFEU FUGUET								
Ms. MARÍA JOSÉ GARCIA BEATO								
Ms. MIREYA GINÉ TORRENS								
Ms. LAURA GONZÁLEZ MOLERO								
Ms. MARÍA GLORIA HERNÁNDEZ GARCÍA								
Mr. GEORGE DONALD JOHNSTON III								
Mr. DAVID MARTÍNEZ GUZMÁN								
Ms. ALICIA REYES REVUELTA								
Ms. MARGARITA SALVANS PUIGBÒ								
Mr. MANUEL VALLS MORATÓ								
Mr. DAVID VEGARA FIGUERAS								
Mr. PEDRO VIÑOLAS SERRA								

iv) Details of other items

Name	Description	Remuneration amount
Mr. JOSEP OLIU CREUS	Item	
Mr. PEDRO FONTANA GARCIA	Item	
Mr. CÉSAR GONZÁLEZ-BUENO MAYER WITTGENSTEIN	Item	
Ms. AURORA CATA SALA	Item	
Ms. ANA COLONQUES GARCÍA-PLANAS	Item	
Mr. LLUÍS DEULOFEU FUGUET	Item	
Ms. MARÍA JOSÉ GARCIA BEATO	Item	
Ms. MIREYA GINÉ TORRENS	Item	
Ms. LAURA GONZÁLEZ MOLERO	Item	
Ms. MARÍA GLORIA HERNÁNDEZ GARCÍA	Item	
Mr. GEORGE DONALD JOHNSTON IIII	Item	
Mr. DAVID MARTÍNEZ GUZMÁN	Item	
Ms. ALICIA REYES REVUELTA	Item	
Ms. MARGARITA SALVANS PUIGBÒ	Item	
Mr. MANUEL VALLS MORATÓ	Item	
Mr. DAVID VEGARA FIGUERAS	Item	
Mr. PEDRO VIÑOLAS SERRA	Item	

ANNUAL REPORT ON THE REMUNERATION OF DIRECTORS OF LISTED PUBLIC COMPANIES

c) Summary of remuneration (thousand euro):

Summarise the amounts corresponding to all the remuneration items included in this report that have accrued to the director, in thousand euro.

Name	Remuneration accrued in the company					Remuneration accrued in group companies					2023 total company + group
	Total cash remuneration	Gross profit on vested shares or financial instruments (thousand euro)	Remuneration under savings systems	Remuneration under other items	2025 total company	Total cash remuneration	Gross profit on vested shares or financial instruments (thousand euro)	Remuneration under savings systems	Remuneration under other items	2025 total group	
Mr. JOSEP OLIU CREUS	1,666	188			1,854						1,854
Mr. PEDRO FONTANA GARCIA	401				401						401
Mr. CÉSAR GONZÁLEZ-BUENO MAYER WITTGENSTEIN	2,777	1,999	1	32	4,809						4,809
Ms. AURORA CATA SALA	195				195						195
Ms. ANA COLONQUES GARCÍA- PLANAS	224				224						224
Mr. LLUÍS DEULOFEU FUGUET	212				212	30				30	242
Ms. MARÍA JOSÉ GARCIA BEATO	253	397			650						650
Ms. MIREYA GINÉ TORRENS	218				218	30				30	248
Ms. LAURA GONZÁLEZ MOLERO	40				40						40
Ms. MARÍA GLORIA HERNÁNDEZ GARCÍA	134				134						134
Mr. GEORGE DONALD JOHNSTON IIII	248				248						248
Mr. DAVID MARTÍNEZ GUZMÁN	121				121						121
Ms. ALICIA REYES REVUELTA	42				42						42
Ms. MARGARITA SALVANS PUIGBÒ	116				116						116
Mr. MANUEL VALLS MORATÓ	244				244						244
Mr. DAVID VEGARA FIGUERAS	929	412	1	34	1,376						1,376
Mr. PEDRO VIÑOLAS SERRA	209				209						209

ANNUAL REPORT ON THE REMUNERATION OF DIRECTORS OF LISTED PUBLIC COMPANIES

TOTAL	8,029	2,996	2	66	11,093	60				60	11,153

C.2. Indicate the changes over the last five years in the amount and percentage change in the remuneration accrued by each of the listed company's directors during the year, in the consolidated results of the company and in the average remuneration on a full-time equivalent basis of the employees of the company and its subsidiaries who are not directors of the listed company.

	Total amounts accrued and % change per annum								
	2025	% Change 2025/2024	2024	% Change 2024/2023	2023	% Change 2023/2022	2022	% Change 2022/2021	2021
Executive directors									
Mr. CÉSAR GONZÁLEZ-BUENO MAYER WITTGENSTEIN	4,809	45.33	3,309	84.14	1,797	-27.42	2,476	30.04	1,904
Mr. DAVID VEGARA FIGUERAS	1,376	31.05	1,050	20.55	871	15.36	755	12.02	674
External directors									
Mr. JOSEP OLIU CREUS	1,854	-3.89	1,929	13.27	1,703	-3.62	1,767	-5.46	1,869
Mr. PEDRO FONTANA GARCÍA	401	2.82	390	14.04	342	2.09	335	30.35	257
Ms. AURORA CATÁ SALA	195	2.63	190	9.83	173	-10.82	194	-4.43	203
Ms. ANA COLONQUES GARCÍA-PLANAS	224	82.11	123	–	0	–	0	–	0
Mr. LLUÍS DEULOFEU FUGUET	242	5.22	230	12.20	205	0.00	205	365.91	44
Ms. MARÍA JOSÉ GARCÍA BEATO	650	39.78	465	9.93	423	22.61	345	10.93	311
Ms. MIREYA GINÉ TORRENS	248	7.83	230	17.95	195	11.43	175	16.67	150
Ms. LAURA GONZÁLEZ MOLERO	40	-79.49	195	34.48	145	383.33	30	–	0
Ms. MARÍA GLORIA HERNÁNDEZ GARCÍA	134	–	0	–	0	–	0	–	0
Mr. GEORGE DONALD JOHNSTON III	248	1.64	244	18.45	206	15.73	178	-5.32	188
Mr. DAVID MARTÍNEZ GUZMÁN	121	-3.20	125	31.58	95	-5.00	100	0.00	100

ANNUAL REPORT ON THE REMUNERATION OF DIRECTORS OF LISTED PUBLIC COMPANIES

	Total amounts accrued and % change per annum								
	2025	% Change 2025/2024	2024	% Change 2024/2023	2023	% Change 2023/2022	2022	% Change 2022/2021	2021
Ms. ALICIA REYES REVUELTA	42	-79.00	200	17.65	170	0.59	169	-20.66	213
Ms. MARGARITA SALVANS PUIGBÒ	116	–	0	–	0	–	0	–	0
Mr. MANUEL VALLS MORATÓ	244	3.83	235	32.02	178	14.84	155	-8.82	170
Mr. PEDRO VIÑOLAS SERRA	209	1.95	205	127.78	90		0		0
Consolidated results of the company									
	2,079,501	-17.28	2,513,899	32.96	1,890,780	52.16	1,242,646	100.43	619,990
Average employee remuneration									
	69	1.47	68	4.62	65	3.17	63	6.78	59

D. OTHER INFORMATION OF INTEREST

This Annual Remuneration Report was approved by the company's Board of Directors at a meeting on:

[19/02/2026]

Indicate whether any board members voted against or abstained with respect to the approval of this report.

[] Yes

[☒] No