



ASN Bank

Pillar 3 Report 2025

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Pillar 3-report

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1. Introduction

1.1 Introduction to Pillar 3

ASN Bank's Pillar 3 report deals with capital adequacy and risk management and has been approved by the management body. It contains the bank's main financial ratios and provides insight into aspects such as our capital position, the size and composition of capital and how the capital is related to risks, as expressed in risk-weighted assets. These ratios can also be found in the Annual Report 2025.

The Pillar 3 report allows us to be transparent and comply with the reporting requirements from the European Capital Requirements Regulation (CRR). It provides information on all the topics mentioned in the Regulation to the extent that they apply to ASN Bank.

The Pillar 3 report is published separately to ASN Bank's Annual Report 2025, which also contains a detailed explanation of capital and risk management. The information included in the Annual Report and the information in this report are consistent and partially overlap.

To make this report more readable, rows and columns in the tables have been omitted where they are not populated because ASN Bank does not have any exposure related to these rows or columns respectively. In these cases the numbering of rows or columns has not been altered. The tables are simultaneously presented in an Excel file in their entirety on our [website](#).

The Pillar 3 report has been prepared in millions of euros (€) unless stated otherwise. The euro is the functional and reporting currency of ASN Bank. Small differences to figures in the Annual Report may occur due to rounding. Numbers presented throughout this document may not precisely add up to the totals due to rounding in some cases.

Where disclosures have been enhanced, we do not restate prior year comparatives, unless stated otherwise.

As of 1 January 2025, we report our regulatory capital metrics and risk exposures in line with Capital Requirements Regulation 3 (CRR 3) instead of CRR 2. The European Banking Authority (EBA) has introduced new and amended Pillar 3 disclosure requirements to align with CRR 3. As a result, some tables have been adjusted or removed and new tables have been introduced. Because these changes do not apply retrospectively, we do not restate prior year comparatives, unless stated otherwise. Where new line items have been introduced, no comparative figures are included. Furthermore, to improve readability and avoid misinterpretation of changes compared to prior year, we only include comparative figures in the templates where they are mandatory in this Pillar 3 report. An overview of the impact of CRR3 on the prior year figures has been included in [1.3 Impact CRR 3 on capitalisation](#).

The mandatory Pillar 3 information of ASN Bank is disclosed every six months, which is the regular disclosure scheme of ASN Bank. These disclosures also include the mandatory quarterly tables.

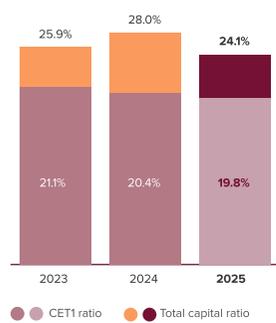
If it is deemed necessary, interim updates on key issues are provided in ASN Bank's press releases or on its website.

The Pillar 3 disclosures have been subject to ASN Bank's internal controls and validation mechanisms, to provide assurance over the information disclosed in this report as well as with regards to compliance with laws and regulations. The information in the Pillar 3 report has not been audited or reviewed by ASN Bank's external auditor.

1.2 Key figures and Management statement

Capital risk

Total capital ratio



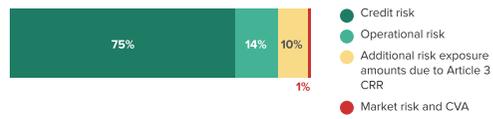
Leverage ratio



Common Equity Tier 1 ratio year-end 2025

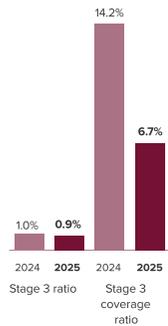
19.8%

Risk-weighted assets

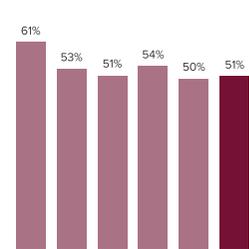


Credit risk

Total loans and advances to customers in stage 3



Average Loan-to-Value of residential mortgages



Loans and advances to customers¹

€ 59.3 billion:



93% Residential mortgages

4% Other corporate & government

3% SME loans

¹Consumer loans are less than 1% of total loans and advances to customers

Liquidity risk

Liquidity position year-end 2025

€12.5 billion

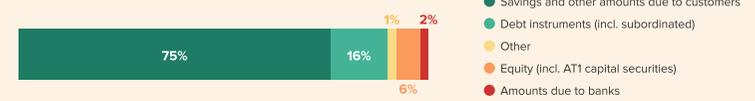
Liquidity Coverage Ratio (LCR) 12-month average 2025

155.9%

Net Stable Funding Ratio (NSFR) year-end 2025

142%

Funding mix



Market risk

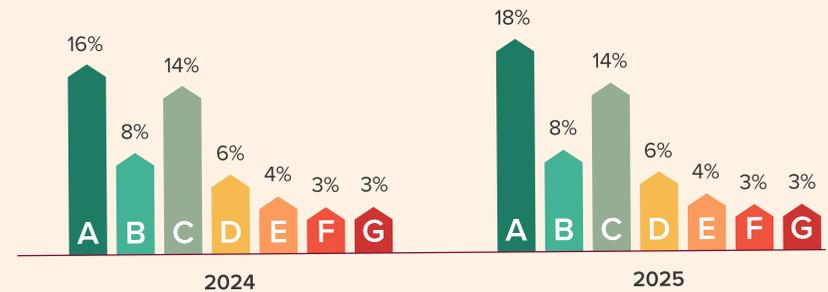
Volume of net interest income at risk year-end 2025

€44 million

Basis point value (in € thousands)



Sustainability risk



¹In 2025 44% of our residential mortgage portfolio did not have a definitive energy efficiency rating compared to 46% in 2024.

Risk management

ASN Bank is an accessible and forward-looking bank with an eye for people, society and the future. We sustainably contribute to financial solutions for our customers while addressing Dutch societal issues. We pay particular attention to sustainability, financial wellbeing and affordable accessible housing. Through this approach, ASN Bank occupies a distinctive position in the Dutch banking landscape. We now serve over three million customers, making us the fourth-largest retail bank in the Netherlands.

ASN Bank has a process in place to identify risks that are material. The risks are included in a comprehensive internal risk inventory. All risks that may have a material impact on our strategic objectives and viability are included in the bank's risk taxonomy, clustered into three categories:

- Strategic risks,
- Financial risks and
- Non-financial risks.

ASN Bank carries out regulated and supervised activities that may be impacted by developments. These developments and related risks may prevent us from achieving our strategic objectives.

ASN Bank annually carries out a Strategic Risk Assessment (SRA), which identifies and assesses the most important risks in relation to its strategy.

We assess the material risks and will adjust the risk taxonomy when necessary. If so, we will take measures to align our strategy and risk appetite to the potential impact of any such top risks. Please refer to the Section [3.1 Institution risk management approach](#) in this report for further details.

Strategic risks

ASN Bank distinguishes three strategic risks, i.e. business risk, reputational risk and sustainability risk.

We have established three strategic risk types because the risks differ in nature. They all have a material impact on the viability of our strategy. They potentially threaten the bank's ability to add long-term value if we fail to adequately identify, and respond to, internal and external changes and events. An exception to this is reputational risk, which always materialises through events caused by other risk types. In order to manage this dynamic interaction in an appropriate manner, reputational risk is classified and managed as a separate risk type.

In general, we have established indicators for all types of risk, ensuring that the development of risks is continuously monitored and that adjustments are made when necessary.

Sustainability risk

Sustainability risk is one of ASN Bank's strategic risks and is part of the bank's risk taxonomy as a stand-alone risk type. This categorisation supports the bank's aim of developing a holistic approach to the incorporation of ESG risk drivers into its overall business strategy, governance, risk management framework, organisational structure and reporting.

We define sustainability risk as the risk arising from Environmental, Social or Governance-related (ESG) factors over the short, medium or long-term that may have an (in)direct financial or reputational impact on ASN Bank - either directly or by acting as a driver for other risk types. In addition, the risk arising from the value chain of ASN Bank which may have an (in)direct negative impact on the environment or society.

We divide sustainability risk into three sub-risk types: environmental risk, social risk and governance risk.

ASN Bank has a low appetite for sustainability risk, our risk profile is mainly driven by the bank's business model and strategy. Being a retail bank with a high concentration of residential mortgage loans in the Netherlands, the risk profile is impacted as follows:

- Physical risk: The intensity and frequency of periods of increased rainfall and at the same time prolonged droughts are increasing and homes will consequently be impacted by the deterioration of foundations and soil. We closely monitor these developments.
- Transition risk: The exposure to transition risk largely depends on the transition to a more sustainable housing sector. We actively encourage and support customers to reduce their energy costs by making their homes more sustainable.

Non-financial risks

Non-financial risks include operational risk, compliance risk and model risk. These risks may have a substantial impact, ASN Bank therefore measures the results of process and system controls to mitigate risks and to further improve processes and systems.

The Executive Board (ExBo) is ultimately responsible for managing and controlling non-financial risks. The Supervisory Board (SB) supervises, advises, challenges and supports the ExBo in its management of non-financial risks, specifically via the Risk & Compliance Committee (R&CC). ASN Bank has a risk taxonomy and related controls in place to identify, closely monitor and report on the risks. The non-financial risk

committee (NFRC) reviews and assesses non-financial risks monthly, based on ASN Bank's risk appetite.

Credit risk

At ASN Bank, we define credit risk as the risk that the bank suffers a financial loss or a material decrease in solvency due to the fact that a borrower or counterparty does not meet the financial or other contractual obligations to the bank, or due to a significant deterioration of the creditworthiness of a specific borrower or counterparty.

ASN Bank is concentrated in residential mortgage loans in the Netherlands. The Dutch residential mortgage market is considered a low-risk segment. Other loan portfolios on the balance sheet, much smaller in size, are:

- Other retail loans: consumer loans including credit facilities and personal loans
- SME loans
- Other corporate and government loans, consisting of:
 - Sustainable finance loans
 - Private placement loans

Over the past years the credit risk of ASN Bank's portfolios decreased due to the strong economic situation of the Netherlands. The unemployment rate is low, salaries increased, house prices increased, and the customer interest rates are favourable. As a result the number of customers in arrears or in default remains low. Portfolio developments are in line with ASN Bank's strategy to increase market share and fit well within the risk appetite of the bank.

Also throughout 2025, interest-only mortgages had our continued attention. We explored additional de-risking measures for interest-only mortgages in the Netherlands. ASN Bank implemented processes to gather information on customers' intention to repay their interest-only mortgage and the affordability of the mortgage at maturity, aligning with ECB guidance. These measures may result in further scrutiny of the future loan volume development, impairment charges and capital.

For Other corporate and government loans, ASN Bank faced a deteriorated financial situation of multiple Sustainable Finance loans. Besides the windmill parks and solar energy parks, ASN Bank also invested in several innovative projects for which the business cases appeared to be less sound than initially projected at origination. ASN Bank placed selected loans on the watchlist and holds higher individually determined provisions for these loans. In 2025, a non-performing loan with a significant exposure was unwound. ASN Bank will continue to closely and actively manage this portfolio from a risk perspective. ASN Bank held appropriate credit provisions for the problem loans during 2025.

The risk profiles for SME loans, Other retail loans and Private placement loans did not significantly change throughout 2025. The portfolio volumes grew only slightly in 2025, the loan sizes are small, and these portfolios are both in absolute and relative terms less material on ASN Bank's balance sheet.

Market risk

Market risk in the banking book mainly comprises market interest rate risk and credit spread risk. Market interest rate risk is the risk that the bank's future interest income deteriorates when market rates change. This risk is inherent of a bank that provides mortgage and savings products. Liquid market instruments with direct or indirect reference to market prices may be affected by credit spread risk. Other risks that may be qualified as market risk are limited for ASN Bank. ASN Bank has a low risk appetite for currency risk. With equity holdings in other companies totalling € 15 million (2024: € 16 million), the equity (price) risk is small. Moreover, the banking book does not contain any exposure to commodities.

Credit spread risk in the banking book (CSRBB) refers to risk driven by changes of the market price for credit risk, for liquidity and for potentially other characteristics of credit related instruments, which is not captured by another existing prudential framework such as IRRBB or by expected credit/(jump-to-) default risk. The bank's CSRBB risk management framework is aligned with European Banking Authority (EBA) guidelines and incorporates European Banking Federation (EBF) interpretations. Risk metrics are based on economic value, net interest income measures, and market value changes. These metrics and associated limits are subject to monthly monitoring and reporting to the Asset and Liability Committee (ALCO).

ASN Bank does not consider the trading book as a core activity, but it has to classify certain activities to the trading book, as per the Capital Requirements Regulation (CRR). The trading book may contain exposure to interest rate risk, credit spread risk and currency risk. There is no mandate in the trading book for equity or commodity risk. The bank does not trade in credit default swaps. Market risk in the trading book is measured and monitored on a daily basis using Value at Risk (VaR), Expected Shortfall (ES) and dedicated stress-testing indicators. These metrics support internal risk oversight and are evaluated against formally established limits.

Liquidity management and funding strategy

Liquidity risk is the risk that ASN Bank, under normal circumstances as well as in times of stress, has insufficient liquid assets available in the short, medium or long-term to meet its financial obligations without incurring unacceptable costs or losses. Liquidity risk also includes the situation in which the balance sheet structure develops in such a way that ASN Bank suffers excessive exposure to a disruption of its funding sources.

Our liquidity management framework is designed to maintain an adequate liquidity and funding profile to support ASN Bank's strategy within our risk appetite.

ASN Bank has a strong liquidity position, enabling the bank to meet its financial obligations at all times. We manage our liquidity position such that we are able to absorb the consequences of bank-specific and market-wide stress factors, such as stress in the money and/or capital markets or a strong outflow of savings and current account balances.

To fund our liquidity needs, we seek to diversify our funding sources in accordance with our funding strategy.

Capital management

The primary objective of capital management is to ensure that the amount of ASN Bank's available capital is sufficient to support our corporate strategy. Our capital targets are determined on the basis of the bank's strategy, risk appetite and exposures, now and in the future. We take into account the supervisory authorities' requirements, rating agencies' expectations and customers' and investors' interests, while aiming to deliver an adequate return for the shareholder. We also steer to meet our internal targets that are in line with our strategy to be a stable bank with a moderate risk profile.

There are no intragroup transactions and/or transactions with related parties that have a material impact on the risk profile of the consolidated group.

Pillar 3 process and management statement

The Pillar 3 disclosures are predominantly based on information used in prudential, financial and management reporting. The data is obtained from several departments and aggregated within the Risk and Finance divisions in conjunction with information used in the management or annual reports. In addition, the Risk and Finance divisions check whether the information complies with the requirements noted in the CRR/CRD. The information has been presented to and approved by the Executive Board and the (respective committees of the) Supervisory Board. Together they form the Management Body of ASN Bank. The Executive Board ('ExBo') is ASN Bank's statutory managing board within the meaning of Section 2:129 Dutch Civil Code and is entrusted with the management of ASN Bank. The Management Body thereby verifies that the Pillar 3 report conveys the risk profile of ASN Bank comprehensively to market participants. In addition, the ExBo verifies that these Pillar 3 disclosures are made in accordance with the formal policies, and internal processes, systems and controls.

The Executive Board (ExBo) of ASN Bank N.V. is responsible for the set-up, presence, and operation of the (risk) management and control system. This system is designed to manage risks, to support ASN Bank in achieving its strategic, operational and financial

objectives, and to ensure that reporting on financial and sustainability performance indicators is reliable and that laws and regulations are complied with.

The Management Body of ASN Bank N.V. is not aware that our internal risk management and control systems do not provide sufficient comfort that the identified operational and compliance risks faced by the company over the year are effectively controlled or addressed in remediation programmes as disclosed in the Risk management section. 'Sufficient comfort' means comfort that takes into account our risk appetite, organisational complexity, system limitations, and related disclosures. However, it should be noted that the internal risk management system does not provide absolute assurance that it can prevent all inaccuracies, errors, fraud, or non-compliance with laws and regulations at all times.

Utrecht, 12 March 2026

EXECUTIVE BOARD

Roland Boekhout, Chief Executive Officer and Chairman
 André Haag, Chief Financial Officer
 Saskia Hoskens, Chief Risk Officer
 Isold Heemstra, Chief Operating Officer
 Gwendolyn van Tunen, Chief Financial Crime Officer

For further in-depth information see the Section [3 Risk management objectives and policies](#).

1.3 Impact CRR 3 on capitalisation

As of 1 January 2025, we report our regulatory capital metrics and risk exposures in line with Capital Requirements Regulation 3 (CRR 3) instead of CRR 2, with a first time adoption effect of + 0.2 percentage points on ASN Bank's Common Equity Tier 1 (CET1).

in € millions	31-12-2025	31-12-2024	31-12-2024
	CRR 3	CRR 3	CRR 2
Total equity	4,331	4,048	4,048
Non-eligible interim profits	-213	-139	-139
Additional Tier 1 capital	-298	-298	-298
Total regulatory and other adjustments to total equity	-206	-162	-169
CET1 capital	3,613	3,448	3,442
Additional Tier 1 capital	298	298	298
Tier 1 capital	3,911	3,746	3,740
Eligible Tier 2	494	997	997
Tier 2 capital	494	997	997
Total capital	4,405	4,743	4,736
Senior non-preferred (SNP) liabilities with remaining maturity >1 year	3,000	3,000	3,000
Total capital and eligible SNP liabilities (MREL)	7,405	7,743	7,736
Risk-weighted assets	18,259	16,931	17,059
Leverage ratio exposure (LRE)	76,810	73,112	73,383
Common Equity Tier 1 ratio¹	19.79%	20.37%	20.18%
Tier 1 capital ratio	21.42%	22.13%	21.92%
Total capital ratio	24.13%	28.01%	27.76%
MREL (Total capital and eligible SNP liabilities) (LRE)	9.64%	10.59%	10.54%
MREL (Total capital and eligible SNP liabilities) (RWA)	40.56%	45.73%	45.35%
Leverage ratio ²	5.09%	5.12%	5.10%

1. CET1 Capital / risk-weighted assets.

2. Tier 1 Capital / leverage ratio exposure (LRE)

The increase of the CET1 ratio of 0.2% mainly follows from a € 0.4 billion decrease in ASN Bank's Internal Ratings Based (IRB) risk-weighted assets (RWA), a € 0.1 billion decrease in RWA for credit risk calculated according to the Standardised Approach (SA) and a € 7 million increase in CET1 capital, largely offset by a € 0.4 billion increase in RWA for operational risk.

The downward impact of CRR 3 on IRB-based RWA is due to the removal of a 1.06 scaling factor to determine residential mortgage-related RWA and the adjustment of the credit conversion factor for off-balance sheet items under the revised IRB approach. These effects were to a large extent offset by applying a 18% floor for the calculated residential mortgage-related IRB-based risk weight to include additional conservatism in agreement with prudential requirements. The upside impact of CRR3 on RWA for operational risk is due to a changed methodology that also takes into account the administrative fines and provision for AFC remediation in 2024.

NHG substitution approach

Under CRR 3, ASN Bank applies the substitution approach for the credit risk calculation of NHG-guaranteed mortgages. At year-end 2025, the application of the substitution approach results in a € 21 million reduction of expected losses and a € 1.9 billion reduction of the reported IRB RWA for credit risk because NHG-guaranteed mortgages are effectively reported as 0% risk-weighted SA exposures to central government. Pending further refinements to be made in IRB modelling regarding non-NHG mortgages, currently the overall impact is neutralised by applying an Article 3 CRR CET1 capital deduction and an Article 3 CRR RWA add-on of equal size.

In this Pillar 3 report, comparative figures up to and including 31 December 2024 are reported under CRR 2.

1.4 Scope of application

Basis of disclosure

ASN Bank prepares the Pillar 3 disclosures in accordance with the Capital Requirements Regulation 2013/575/EU (CRR), the Capital Requirements Directive 2013/36/EU (CRD) and related legislation. The basis for preparation of the Pillar 3 disclosures are the consolidated financial statements in accordance with International Financial Reporting Standards (IFRS), as adopted within the European Union. The

information in this report relates to ASN Bank N.V. and all of its subsidiaries. The prudential scope of consolidation for the purpose of calculating regulatory capital is the same as the International Financial Reporting Standards scope of consolidation of ASN Bank.

For more information about the accounting principles and basis for consolidation, please refer to the Annual Report 2025.

EU LI1 – Differences between accounting and regulatory scopes of consolidation and the mapping of financial statement categories with regulatory risk categories 2025

in € millions	a/b	c	d	e	f	g
	Carrying values as reported in published financial statements and under scope of prudential consolidation	Subject to credit risk framework	Subject to counterparty credit risk framework ¹	Carrying values of items: Subject to the securitisation framework	Subject to the market risk framework	Not subject to own funds requirements or subject to deduction from own funds
Assets						
Cash and cash equivalents	1,178	1,178	-	-	-	-
Derivatives	1,789	-	1,789	-	185	-
Investments	6,809	6,529	-	269	10	-
Loans and advances to banks	7,323	7,056	267	-	-	-
Loans and advances to customers	59,172	59,172	-	-	-	-
Tangible and intangible assets	48	43	-	-	-	5
Tax assets	3	3	-	-	-	-
Other assets	342	342	-	-	-	-
Total assets	76,664	74,324	2,056	269	195	5
Liabilities						
Derivatives	509	-	509	-	182	-
Amounts due to banks	1,117	-	1,079	-	-	38
Amounts due to customers	57,811	-	272	-	-	57,539
Debt certificates	11,873	-	-	-	-	11,873
Subordinated debts	494	-	-	-	-	494
Provisions	263	-	-	-	-	263
Tax liabilities	2	-	-	-	-	2
Other liabilities	264	-	-	-	-	264
Total Liabilities	72,333	-	1,859	-	182	70,473
Share capital	381	-	-	-	-	381
Reserves	3,384	-	-	-	-	3,384
Net result for the period	268	-	-	-	-	268
AT1 capital securities	298	-	-	-	-	298
Total equity	4,331	-	-	-	-	4,331
Total equity and liabilities	76,664	-	1,859	-	182	74,804

1. This concerns repurchase agreements and derivatives, which are mainly part of an GMRA or ISDA master netting agreement.

Items subject to credit risk increased to € 74.3 billion (2024: € 71.0 billion), mainly due to an increase in loans and advances to customers. This was partly offset by a decrease in balances at central banks and investments. Items subject to counterparty credit risk decreased to € 3.9 billion (2024: € 4.8 billion). This was mainly due to a decrease in both derivative assets and liabilities.

EU LI2 – Main sources of differences between regulatory exposure amounts and carrying values in financial statements 2025

in € millions	a	b	c			d	e
	Total	Credit risk framework	Items subject to:			CCR framework ¹	Market risk framework
			Securitisation framework				
1 Assets carrying value amount under scope of prudential consolidation (as per template LI1)	76,660 ²	74,324	269		2,056		195
2 Liabilities carrying value amount under regulatory scope of prudential consolidation (as per template LI1)	1,859	-	-		1,859		182
3 Total net amount under the scope of prudential consolidation	74,801	74,324	269		197		13
4 Off-balance-sheet amounts	3,586	3,586 ³	-		-		
5 Differences in valuations	-3	-3	-		-		
6 Differences due to different netting rules, other than those already included in row 2	-	-	-		-		
7 Differences due to consideration of provisions	53	53	-		-		
8 Differences due to the use of credit risk mitigation techniques (CRMs)	-2	-2	-		-		
9 Differences due to credit conversion factors	-1,919	-1,919	-		-		
10 Differences due to Securitisation with risk transfer	-	-	-		-		
11 Other differences	2,170	1,541	-		629		
12 Exposure amounts considered for regulatory purposes	78,686	77,581	269		825		13

1. This concerns repurchase agreements and derivatives, which are mainly part of a GMRA or ISDA master netting agreement.

2. Excluding assets not subject to capital requirements or subject to deduction from capital as per template EU-LI1 column g.

3. After value adjustments and provisions.

Explanations of differences between accounting and regulatory exposure amounts

The main differences between the carrying value of assets in the financial statements and the exposure amounts considered for regulatory purposes per year-end 2025 can be explained by the following elements:

- inclusion of off-balance sheet liabilities and the effect of credit conversion factors (shown in row 4 and 9)
- loan loss provisions are not taken into account in the IRB exposure value of residential mortgages (shown in row 7)
- exclusion of fair value adjustments from hedge accounting (shown in row 11)
- different valuation of derivatives due to netting rules (shown in row 11)
- inclusion of an add-on for derivatives and a multiplier of 1,4 (shown in row 11)
- the exclusion of items that are capital deducted (shown in row 11)

For further information on the IRB exposure value of residential mortgages, please refer to the Section [7.4 Use of the AIRB approach to credit risk](#).

As the prudential scope of consolidation for the purpose of calculating regulatory capital is the same as the IFRS scope of consolidation of ASN Bank, template EU LI3 is not applicable and therefore not disclosed.

EU PV1: Prudent valuation adjustments (PVA) 2025

Category level AVA in € millions	a	b	c		d	e	EU e1		EU e2	f	g	h
	Equity	Interest Rates	Risk category Foreign exchange		Credit	Commodities	Category level AVA - Valuation uncertainty Unearned credit spreads AVA		Investment and funding costs AVA	Total category level post-diversi- fication	Of which: Total core approach in the Trading Book	Of which: Total core approach in the Banking Book
12 Total Additional Valuation Adjustments (AVAs)										3	-	-

ASN Bank uses the Simplified approach for calculating the prudent valuation adjustment for fair valued positions, hence only the additional valuation adjustments are reported in the tables above. The prudent valuation adjustment is in line with previous periods.

Other qualitative information on the scope of application

There is no current or foreseen material practical or legal impediment to the prompt transfer of own funds or repayment of liabilities between the ASN Bank and its subsidiaries.

All subsidiaries are included in the prudential scope of consolidation for the purpose of calculating regulatory capital. Therefore, the aggregate amount by which the actual own funds are less than the required minimum in subsidiaries not included in the consolidation scope is nil.

According to the CRR ASN Bank is required to comply with prudential and liquidity requirements on a consolidated and individual basis. In 2022, ASN Bank received a waiver for the prudential requirements on an individual basis in accordance with Article 7 CRR. ASN Bank does not make use of derogation referred to in Article 9 CRR.

1.5 Detailed index of Pillar 3 references

The Pillar 3 disclosure requirements are described in Part Eight of the CRR. The table below provides insight into these requirements and states where the reader can find this information in the Pillar 3 report and/or the Annual Report.

CRR 3 article	Pillar 3 disclosure requirements	Location in Pillar 3 report	Notes
435	Disclosure of risk management objectives and policies	Section 1.2 Key figures and Management Statement Section 3 Risk management objectives and policies Section 4 Own funds Section 5 Leverage Section 7.1.1 General qualitative information regarding credit risk Section 9.1 Qualitative disclosure requirements regarding CCR Section 11.2 Interest rate risk not included in the trading portfolio Section 12 Operational risk See also the Annual Report of ASN Bank	Section 'Risk, funding & capital' in the Annual Report addresses subjects of the risk committees and the governance provisions. Section 'Strategy and performance' in the Annual Report discusses our strategy and our strategic objectives.
436	Disclosure of the scope of application	Section 1.3 Scope of application	In the Section 1.3 Scope of application the basis for consolidation is included.
437	Disclosure of own funds	Section 4 Own funds	
437a	Disclosure of own funds and eligible liabilities	Section 4 Own funds	ASN Bank is not a Globally Systemically Important Institution (G-SII). MREL (and not TLAC) is applicable as ASN Bank is a Resolution Group under SRB's remit.
438	Disclosure of own funds requirements and risk weighted exposure amounts	Section 2.2 Overview of RWA Section 2.3 ICAAP information (including CRR/CRD IV requirements) Section 4.2 Own funds Section 4.3 Macro prudential supervisory measures	
439	Disclosure of exposures to counterparty credit risk	Section 9 Counterparty credit risk (CRR)	
440	Disclosure of countercyclical capital buffers	Section 4.3 Macroprudential supervisory measures	
441	Disclosure of indicators of global systemic importance	Not included	ASN Bank is not considered an institution of global systemic importance.
442	Disclosure of exposures to credit risk and dilution risk	Section 7.1.1 General qualitative information regarding credit risk Section 7.1.2 General quantitative information regarding credit risk	
443	Disclosure of encumbered and unencumbered assets	Section 6.3 Encumbered and unencumbered assets	
444	Disclosure of the use of the Standardised Approach	Section 7.3 Use of the Standardised Approach	
445	Disclosure of exposure to market risk	Section 11.1 Market risk qualitative disclosure	
445a	Disclosure of CVA risk	Section 8 Credit valuation adjustments (CVA) risk	
446	Disclosure of operational risk	Section 12 Operational risk	
447	Disclosure of key metrics	Section 2.1 Key metrics	
448	Disclosure of exposures to interest rate risk on positions not held in the Trading Book	Section 11.2 Interest rate risk not included in the Trading Book	
449	Disclosure of exposures to securitisation positions	Section 10 Securitisation	
449a	Disclosure of environmental, social and governance risks (ESG risks)	Section 14 Sustainability risk	
449b	Disclosure of aggregate exposure to shadow banking entities	Section 7.3.2 Quantitative information regarding the use of the Standardised Approach	
450	Disclosure of remuneration policy	Section 13 Remuneration policy	Section Remuneration Report in the Annual Report of ASN Bank also contains information about the remuneration report.
451	Disclosure of the leverage ratio	Section 5 Leverage ratio	
451a	Disclosure of liquidity requirements	Section 6.1 Liquidity risk management Section 6.2 Liquidity Coverage Ratio Section 6.4 Net Stable Funding Ratio	
451b	Disclosure of crypto-asset exposures and related activities	Not included	ASN Bank does not have any crypto-assets exposures.
452	Disclosure of the use of the IRB Approach to credit risk	Section 7.4 Use of the AIRB approach to credit risk	
453	Disclosure of the use of credit risk mitigation techniques	Section 7.2 Use of credit risk mitigation techniques	
454	Disclosure of the use of the Advanced Measurement Approaches to operational risk	Not included	ASN Bank does not use internal models to calculate capital requirements for operational risk.
455	Use of internal market risk models	Not included	ASN Bank does not use internal models to calculate capital requirements for market risk.

1.6 Tables that are out of scope for ASN Bank

The following tables are not applicable to ASN Bank and therefore not included in this report.

Table	Description	Reason for exclusion
EU INS1	Insurance participations	ASN Bank does not hold any own fund instruments in insurance or re-insurance undertakings or insurance holding company not deducted from own funds.
EU INS2	Financial conglomerates information on own funds and capital adequacy ratio	ASN Bank is not (part of) a financial conglomerate.
EU LI3	Outline of the differences in the scopes of consolidation (entity by entity)	The prudential scope of consolidation for the purpose of calculating regulatory capital is the same as the IFRS scope of consolidation of ASN Bank.
EU CQ7	Collateral obtained by taking possession and execution processes	ASN Bank does not have collateral obtained by taking possession and execution processes.
EU CR7	AIRB approach – Effect on the RWAs	ASN Bank does not use credit derivatives as a form of security or as an instrument to hedge credit risk.
EU CR9.1	IRB approach – Back-testing of PD per exposure class	ASN Bank does not apply CRR Article 180(1)(f).
EU CR10	Specialised lending and equity exposures under the simple risk weighted approach	ASN Bank does not use the Internal Ratings Based approach for specialised lending and equity exposures.
EU MR2-A	Market risk under the Internal Model Approach (IMA)	ASN Bank does not use the Internal Model Approach to calculate own funds requirements for market risk.
EU MR2-B	RWA flow statements of market risk exposures under the IMA	ASN Bank does not use the Internal Model Approach to calculate own funds requirements for market risk.
EU MR3	IMA values for trading portfolio	ASN Bank does not use the Internal Model Approach to calculate own funds requirements for market risk.
EU MR4	Comparison of VaR estimates with gains/losses	ASN Bank does not use the Internal Model Approach to calculate own funds requirements for market risk.
EU CCR4	IRB approach – CCR exposures by portfolio and PD scale	ASN Bank does not use the Internal Ratings Based approach for counterparty credit risk exposures
EU CCR6	Credit derivative exposures	ASN Bank does not use credit derivatives as a form of security or as an instrument to hedge credit risk
EU CCR7	RWEA flow statements of credit exposures under the IMM	ASN Bank does not use the Internal Ratings Based approach for counterparty credit risk exposures
EU CVA2	Credit valuation adjustment risk under the Full Basic Approach (F-BA)	ASN Bank does not use the Full Basic Approach to calculate Credit valuation adjustment risk
EU CVA3	Credit valuation adjustment risk under the Standardised Approach (SA)	ASN Bank does not use the Standardised Approach to calculate Credit valuation adjustment risk
EU CVA4	RWEA flow statements of credit valuation adjustment risk under the Standardised Approach (SA)	ASN Bank does not use the Standardised Approach to calculate Credit valuation adjustment risk
EU SEC2	Securitisation exposures in the Trading Book	ASN Bank does not have any Trading Book securitisation exposures.
EU SEC3	Securitisation exposures in the Non-Trading Book and associated regulatory capital requirements - institution acting as originator or as sponsor	Where ASN Bank is the originator institution of securitisation, own funds requirements are calculated on the securitised exposures instead of securitisation positions from the securitisations.
EU REM3	Deferred remuneration	ASN Bank does not grant deferred remuneration.
EU REM4	Remuneration of 1 million EUR or more per year	ASN Bank does not have staff that have been remunerated €1 million or more per financial year.
EU TLAC2	Creditor ranking - Entity that is not a resolution entity	ASN Bank is not a Globally Systemically Important Institution (G-SII), nor an entity that is not a resolution entity itself, pursuant to Article 92b CRR, and Articles 45 and 45f BRRD. Therefore, the internal MREL does not apply.
EU iLAC	Internal loss absorbing capacity: internal MREL and, where applicable, requirement for own funds and eligible liabilities for non-EU G-SIIs	ASN Bank is not a Globally Systemically Important Institution (G-SII), nor an entity that is not a resolution entity itself, pursuant to Article 92b CRR, and Articles 45 and 45f BRRD. Therefore, the internal MREL does not apply.
EU CAE1	Exposure to crypto-assets	ASN Bank does not have any crypto-assets exposures.
ESG Template 4	Banking Book - Indicators of potential climate change transition risk: Exposures to top 20 carbon-intensive firms	As a result of our sustainability policies we exclude almost all activities in the fossil fuel, mining, and iron, steel and coke production sector and therefore we have no exposure to the top 20 carbon-intensive firms.

The NPE ratio of ASN Bank is below the 5% threshold in accordance with Article 9 (2) of Regulation (EU) 2024/3172. Therefore the following tables are not included in this report.

Table	Description
EU CR2a	Changes in the stock of non-performing loans and advances and related accumulated recoveries
EU CQ2	Quality of forbearance
EU CQ6	Collateral valuation – loans and advances
EU CQ8	Collateral obtained by taking possession and execution processes – vintage breakdown

In line with the latest regulatory developments as a result of the Omnibus I package, template 6 to 10 are excluded.

Table	Description
ESG Template 6	Summary of key performance indicators (KPIs) on the Taxonomy-aligned exposures
ESG Template 7	Mitigating actions: Assets for the calculation of GAR
ESG Template 8	GAR (%)
ESG Template 9.1	Mitigating actions: Assets for the calculation of BTAR
ESG Template 9.2	BTAR %
ESG Template 9.3	Summary table - BTAR %
ESG Template 10	Banking book - Other climate change mitigating actions that are not covered in the EU Taxonomy

2. Key metrics and overview of RWA

2.1 Key metrics

EU KM1 - Key metrics

in € millions ¹		a	b	c	d	e
		31-12-2025	30-9-2025	30-6-2025	31-3-2025	31-12-2024
Available own funds (amounts)						
1	Common Equity Tier 1 (CET1) capital	3,613	3,626	3,586	3,587	3,442
2	Tier 1 capital	3,911	3,924	3,883	3,884	3,740
3	Total capital	4,405	4,436	4,898	4,887	4,736
Risk-weighted exposure amounts						
4	Total risk exposure amount	18,259	17,619	17,931	17,172	17,059
4a	Total risk exposure pre-floor	18,259	17,619	17,931	17,172	
Capital ratios (as a percentage of risk-weighted exposure amount)						
5	Common Equity Tier 1 ratio (%)	19.79%	20.58%	20.00%	20.89%	20.18%
5b	Common Equity Tier 1 ratio considering unfloored TREA (%)	19.79%	20.58%	20.00%	20.89%	
6	Tier 1 ratio (%)	21.42%	22.27%	21.66%	22.62%	21.92%
6b	Tier 1 ratio considering unfloored TREA (%)	21.42%	22.27%	21.66%	22.62%	
7	Total capital ratio (%)	24.13%	25.18%	27.32%	28.46%	27.76%
7b	Total capital ratio considering unfloored TREA (%)	24.13%	25.18%	27.32%	28.46%	
Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)						
EU-7d	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	3.50%	3.50%	3.50%	3.50%	3.00%
EU-7e	of which: to be made up of CET1 capital (percentage points)	1.97%	1.97%	1.97%	1.97%	1.69%
EU-7f	of which: to be made up of Tier 1 capital (percentage points)	2.63%	2.63%	2.63%	2.63%	2.25%
EU-7g	Total SREP own funds requirements (%)	11.50%	11.50%	11.50%	11.50%	11.00%
Combined buffer and overall capital requirement (as a percentage of risk-weighted exposure amount)						
8	Capital conservation buffer (%)	2.50%	2.50%	2.50%	2.50%	2.50%
EU-8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	0.00%	0.00%	0.00%	0.00%	0.00%
9	Institution specific countercyclical capital buffer (%)	1.91%	1.90%	1.89%	1.89%	1.91%
EU-9a	Systemic risk buffer (%)	0.00%	0.00%	0.00%	0.00%	0.00%
10	Global Systemically Important Institution buffer (%)	0.00%	0.00%	0.00%	0.00%	0.00%
EU-10a	Other Systemically Important Institution buffer (%)	0.25%	0.25%	0.25%	0.25%	0.25%
11	Combined buffer requirement (%)	4.66%	4.65%	4.64%	4.64%	4.66%
EU-11a	Overall capital requirements (%)	16.16%	16.15%	16.14%	16.15%	15.66%
12	CET1 available after meeting the total SREP own funds requirements (%)	12.63%	13.6%	13.03%	13.99%	13.67%
Leverage ratio						
13	Total exposure measure	76,810	74,610	75,394	73,234	73,383
14	Leverage ratio (%)	5.09%	5.26%	5.15%	5.30%	5.10%

in € millions ¹		a	b	c	d	e
		31-12-2025	30-9-2025	30-6-2025	31-3-2025	31-12-2024
Additional own funds requirements to address the risk of excessive leverage (as a percentage of total exposure measure)						
EU-14a	Additional own funds requirements to address the risk of excessive leverage (%)	0.00%	0.00%	0.00%	0.00%	0.00%
EU-14b	of which: to be made up of CET1 capital (percentage points)	0.00%	0.00%	0.00%	0.00%	0.00%
EU-14c	Total SREP leverage ratio requirements (%)	3.00%	3.00%	3.00%	3.00%	3.00%
Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)						
EU-14d	Leverage ratio buffer requirement (%)	0.00%	0.00%	0.00%	0.00%	0.00%
EU-14e	Overall leverage ratio requirement (%)	3.00%	3.00%	3.00%	3.00%	3.00%

1. Figures up until 31 December 2024 in accordance with CRR 2. Figures from 31 March 2025 onwards in accordance with CRR 3.

As of 1 January 2025, we report our regulatory capital metrics and risk exposures in line with Capital Requirements Regulation 3 (CRR 3) instead of CRR 2. Comparative year-end 2024 figures included in the table above have not been adjusted and therefore represent the CRR 2 capital metrics and risk exposures. The first-time adoption of CRR3 had an effect of +0.2% on ASN Bank's Common Equity Tier 1 (CET1) ratio as per year-end 2024 as a result of slightly decreasing risk-weighted assets (RWA).

In 2025, ASN Bank's CET1 ratio slightly decreased to 19.8% (year-end 2024: 20.2% CRR 3), well above our internal planning target of at least 17%. While our CET1 capital increased due to the addition of retained earnings for the year 2024 and interim profits for the year 2025, the amount of RWA increased relatively more in 2025 as the bank initiated additional asset growth, thus optimising our risk-return profile. The CET1 ratio target of at least 17% includes an ample management buffer above the current 11.5% CET1 Overall Capital Requirement (OCR), to withstand severe stress scenarios and to provide flexibility to absorb potentially higher capital requirements.

The leverage ratio stayed almost the same, 5.09% at the end of 2025, and 5.10% at year-end 2024, as the € 3.4 billion growth in leverage ratio exposure (LRE) to € 76.8 billion slightly outweighs the € 171 million increase in CET1 capital. The 5.09% leverage ratio is well above the regulatory requirement of 3.0%, and above our target of at least 4.5%.

EU KM1 - Key metrics liquidity

	a	b	c	d	e	
	31-12-2025	30-9-2025	30-6-2025	31-3-2025	31-12-2024	
Liquidity Coverage Ratio						
15	Total high-quality liquid assets (HQLA) (Weighted value -average)	6,772	7,373	7,765	8,077	8,620
EU-16a	Cash outflows - Total weighted value	6,746	6,540	6,442	6,330	6,190
EU-16b	Cash inflows - Total weighted value	2,332	1,880	1,633	1,543	1,411
16	Total net cash outflows (adjusted value)	4,414	4,659	4,809	4,787	4,779
17	Liquidity coverage ratio (%) ¹	155.94%	159.65%	162.85%	169.85%	180.87%
Net Stable Funding Ratio						
18	Total available stable funding	65,060	64,365	65,190	65,212	65,643
19	Total required stable funding	45,813	45,586	44,964	43,742	41,863
20	NSFR ratio (%) ²	142.01%	141.20%	144.98%	149.08%	156.80%

- The LCR figures in this template are calculated using the reported supervisory values and figures for each of the four calendar quarters (January-March, April-June, July-September, October-December) preceding the disclosure date. The values and figures in the template are calculated as the simple averages of month-end observations over the twelve months preceding the end of each quarter. Following this approach, the LCR cannot be calculated using the figures in the template.
- In 2025, ASN Bank has reclassified the negative macro fair value hedge adjustments from a residual maturity of over one year to a residual maturity of less than six months. Furthermore, ASN bank has included off-balance mortgages agreed but not yet drawn in items requiring stable funding. The figures from June 2025, March 2025 and December 2024 have been revised in this Pillar 3 report compared to our 2025 Interim Pillar 3 report and 2024 Pillar 3 report to include these changes.

The Liquidity Coverage Ratio (LCR) and the Net Stable Funding Ratio (NSFR) remained above the regulatory minimum of 100%. At year-end 2025, the LCR stood at 194% (2024: 191%) and the NSFR at 142% (2024: 157%). The Loan-to-Deposit (LtD) ratio increased to 104% at year-end 2025, from 99% at year-end 2024. This increase was driven by € 4.5 billion loan growth accompanied by a € 1.6 billion increase in deposits. While the LtD-increase lowered available liquidity, the downward impact on the LCR was offset by attracting more money market funding longer than 30 days and by the increased investment of available liquidity with several counterparties in the money market within the 30-day LCR window to manage our liquidity position. The reduction in the NSFR is mainly explained by an increase in required stable funding due to the implementation of CRR 3 and an increase in our residential mortgage portfolio.

EU KM2: Key metrics - MREL and, where applicable, G-SII requirement for own funds and eligible liabilities

	a	
	Minimum requirement for own funds and eligible liabilities (MREL)	
	31-12-2025	
Own funds and eligible liabilities, ratios and components		
1	Own funds and eligible liabilities	7,448
EU-1a	Of which own funds and subordinated liabilities	7,405
2	Total risk exposure amount of the resolution group (TREA)	18,259
3	Own funds and eligible liabilities as a percentage of TREA	40.79%
EU-3a	Of which own funds and subordinated liabilities	40.56%
4	Total exposure measure (TEM) of the resolution group	76,810
5	Own funds and eligible liabilities as percentage of the TEM	9.70%
EU-5a	Of which own funds or subordinated liabilities	9.64%
6a	Does the subordination exemption in Article 72b(4) of the CRR apply? (5% exemption)	
6b	Aggregate amount of permitted non-subordinated eligible liabilities instruments if the subordination discretion in accordance with Article 72b(3) of Regulation (EU) No 575/2013 is applied (max 3.5% exemption)	
6c	If a capped subordination exemption applies in accordance with Article 72b (3) of Regulation (EU) No 575/2013, the amount of funding issued that ranks pari passu with excluded liabilities and that is recognised under row 1, divided by funding issued that ranks pari passu with excluded liabilities and that would be recognised under row 1 if no cap was applied (%)	
Minimum requirement for own funds and eligible liabilities (MREL)		
EU-7	MREL expressed as a percentage of the TREA	26.22%
EU-8	Of which to be met with own funds or subordinated liabilities	21.56%
EU-9	MREL expressed as a percentage of the TEM	7.91%
EU-10	Of which to be met with own funds or subordinated liabilities	7.91%

On 18 December 2025, the National Resolution Authority (NRA) updated the Minimum Requirement for Own Funds and Eligible Liabilities (MREL) requirements for ASN Bank. The MREL requirement based on the leverage ratio exposure (LRE) amounts to 7.91% and the MREL requirement based on RWA to 21.56%, excluding the Combined Buffer Requirement. Both the LRE and RWA MREL requirements are to be fully met with subordinated instruments, i.e. Tier 1 capital, Tier 2 capital and senior non-preferred (SNP) notes with a residual contractual maturity of at least 1 year. The non-risk-weighted MREL requirements are more restrictive for ASN Bank than the risk-weighted MREL requirements.

As at 31 December 2025, ASN Bank operates well above the MREL requirements.

In 2025 total capital and eligible SNP liabilities decreased by € 0.3 billion to € 7.4 billion due to a decrease in eligible liabilities.

On 21 July 2025, ASN Bank announced to call the outstanding € 0.5 billion Tier 2 capital instrument that was issued on 22 July 2020. This had already been anticipated in 2024 with the issuance of € 0.5 billion in a green Tier 2 capital instrument. Furthermore, on 20 October 2025 ASN Bank successfully issued € 0.5 billion in green SNP debt with a 7-year maturity to strengthen its MREL position in anticipation of expected future redemptions.

As at 31 December 2025, the non-risk-weighted MREL ratio based on the LRE stood at 9.64% (year-end 2024 10.54%), including total capital and SNP liabilities eligible for MREL.

The risk-weighted MREL ratio, based on total capital and eligible SNP liabilities, stood at 40.56% (year-end 2024: 45.35%).

ASN Bank is not a Globally Systemically Important Institution (G-SII). Therefore, columns b to f of table EU KM2 are not applicable.

2.2 Overview of RWA

EU OV1 – Overview of RWA

in € millions ¹	Total risk exposure amounts (TREA)					Total own funds requirements			
	a				b	c			
	31-12-2025	30-9-2025	30-6-2025	31-3-2025	31-12-2024	31-12-2025	30-9-2025	30-6-2025	31-3-2025
1 Credit risk (excluding CCR)²	15,289	15,002	15,177	14,353	14,664	1,223	1,200	1,214	1,148
2 <i>Of which the standardised approach</i>	4,891	4,839	5,298	4,689	4,726	391	387	424	375
3 <i>Of which the Foundation IRB (F-IRB) approach</i>	-	-	-	-	-	-	-	-	-
4 <i>Of which slotting approach</i>	-	-	-	-	-	-	-	-	-
EU-4a <i>Of which equities under the simple riskweighted approach</i>	-	-	-	-	-	-	-	-	-
5 <i>Of which the advanced IRB (A-IRB) approach</i>	8,519	8,190	7,908	7,611	9,938	682	655	633	609
6 Counterparty credit risk - CCR	166	100	150	179	192	13	8	12	14
7 <i>Of which the standardised approach</i>	158	93	142	171	184	13	7	11	14
8 <i>Of which internal model method (IMM)</i>	-	-	-	-	-	-	-	-	-
EU-8a <i>Of which exposures to a CCP</i>	8	8	7	8	9	1	1	1	1
9 <i>Of which other CCR</i>	-0	-0	1	-0	-	-0	-0	0	-0
10 Credit valuation adjustments risk - CVA risk	77	44	71	84	54	6	4	6	7
EU-10a <i>Of which the standardised approach (SA)</i>	-	-	-	-	-	-	-	-	-
EU-10b <i>Of which the basic approach (F-BA and R-BA)</i>	77	44	71	84	-	6	4	6	7
EU-10c <i>Of which the simplified approach</i>	-	-	-	-	-	-	-	-	-
15 Settlement risk	-	-	-	-	-	-	-	-	-
16 Securitisation exposures in the Non-Trading Book (after the cap)	27	26	26	24	28	2	2	2	2
17 <i>Of which SEC-IRBA approach</i>	-	-	-	-	-	-	-	-	-
18 <i>Of which SEC-ERBA (including IAA)</i>	-	-	-	-	2	-	-	-	-
19 <i>Of which SEC-SA approach</i>	27	26	26	24	27	2	2	2	2
EU-19a <i>Of which 1250% / deduction</i>	-	-	-	-	-	-	-	-	-
20 Position, foreign exchange and commodities risks (Market risk)	192	106	166	192	159	15	8	13	15
21 <i>Of which the standardised approach³</i>	192	106	166	192	159	15	8	13	15
22 <i>Of which IMA</i>	-	-	-	-	-	-	-	-	-
EU-22a Large exposures	-	-	-	-	-	-	-	-	-
23 Reclassifications between trading and non-trading books	-	-	-	-	-	-	-	-	-
24 Operational risk	2,507	2,340	2,340	2,340	1,961	201	187	187	187
EU-24a Exposures to crypto-assets	-	-	-	-	-	-	-	-	-
25 Amounts below the thresholds for deduction (subject to 250% risk weight)	-	-	-	-	-	-	-	-	-
26 Output floor applied (%)	50%	50%	50%	50%	-	-	-	-	-
27 Floor adjustment (before application of transitional cap)	-	-	-	-	-	-	-	-	-
28 Floor adjustment (after application of transitional cap)	-	-	-	-	-	-	-	-	-
29 Total	18,259	17,619	17,931	17,172	17,059	1,461	1,410	1,434	1,374

1. Figures up until 31 December 2024 in accordance with CRR 2. Figures from 31 March 2025 onwards in accordance with CRR 3.

2. This includes an Article 3 CRR add-on of € 1,879 million pending further refinements to be made in IRB modelling regarding non-NHG mortgages.

3. Due to the delay of the application date of the Fundamental Review of the Trading Book (FRTB) rules, market risk capital requirements under CRR 3 are still calculated based on the Standardised Approach as applicable under CRR 2.

In 2025, total RWA rose by € 1.2 billion to € 18.3 billion, including the € 0.1 billion downward impact of CRR 3 (see the Section [1.3 Impact CRR 3 on capitalisation](#)). The € 1.3 billion RWA increase during 2025 was mainly caused by a € 0.9 billion increase resulting from residential mortgage volume growth, a € 0.2 billion for operational risk and a € 0.2 billion increase for credit risk calculated according to the SA, primarily caused by increased exposures to institutions.

The RWA for credit risk based on the IRB approach mainly decreased due to the impact of the substitution approach for the credit risk calculation of NHG-guaranteed mortgages, neutralised by applying an Article 3 CRR RWA add-on of equal size.

The RWA for market risk increased by € 33 million. The RWA for the Credit Valuation Adjustment and securitisation notes increased slightly by € 22 million in total.

For all quarters as shown in Table EU OV1, the total net position in foreign currency is lower than the CRR threshold of 2% of total capital. Therefore no capital is required for foreign exchange risk.

2.3 Comparison of modelled and standardised RWA

EU CMS1 - Comparison of modelled and standardised risk weighted exposure amounts at risk level 31-12-2025

in € millions		a	b	c	d	EU d
		Risk weighted exposure amounts (RWEAs)				
		RWEAs for modelled approaches that banks have supervisory approval to use	RWEAs for portfolios where standardised approaches are used	Total actual RWEAs (a + b)	RWEAs calculated using full standardised approach	RWEAs that is the base of the output floor
1	Credit risk (excluding counterparty credit risk)	8,519	4,891	13,410	18,206	18,206
2	Counterparty credit risk	-	166	166	166	166
3	Credit valuation adjustment		77	77	77	77
4	Securitisation exposures in the banking book	-	27	27	27	27
5	Market risk	-	192	192	139	139
6	Operational risk		2,507	2,507	2,507	2,507
7	Other risk weighted exposure amounts		1,879	1,879	-	-
8	Total	8,519	9,739	18,259	21,122	21,122

The total RWA would increase by € 2.8 billion if the standardised approach were used on all exposures including the IRB exposures. Our total RWA exceeds the minimum capital requirement set by the output floor. Therefore, no adjustment is applicable from the application of the output floor.

EU CMS1 - Comparison of modelled and standardised risk weighted exposure amounts at risk level 30-9-2025

in € millions		a	b	c	d	EU d
		Risk weighted exposure amounts (RWEAs)				
		RWEAs for modelled approaches that banks have supervisory approval to use	RWEAs for portfolios where standardised approaches are used	Total actual RWEAs (a + b)	RWEAs calculated using full standardised approach	RWEAs that is the base of the output floor
1	Credit risk (excluding counterparty credit risk)	8,190	4,839	13,029	17,855	17,855
2	Counterparty credit risk	-	100	100	100	100
3	Credit valuation adjustment		44	44	44	44
4	Securitisation exposures in the banking book	-	26	26	26	26
5	Market risk	-	106	106	100	100
6	Operational risk		2,340	2,340	2,340	2,340
7	Other risk weighted exposure amounts		1,973	1,973	-	-
8	Total	8,190	9,428	17,619	20,466	20,466

EU CMS2 - Comparison of modelled and standardised risk weighted exposure amounts for credit risk at asset class level 31-12-2025

in € millions		a	b	Risk weighted exposure amounts (RWEAs)		EU d
		RWEAs for modelled approaches that institutions have supervisory approval to use	RWEAs for column (a) if re-computed using the standardised approach	Total actual RWEAs	RWEAs calculated using full standardised approach	RWEAs that is the base of the output floor
1	Central governments and central banks	-	-	-	-	-
EU 1a	Regional governments or local authorities	-	-	64	64	64
EU 1b	Public sector entities	-	-	36	36	36
EU 1c	Categorised as Multilateral Development Banks in SA	-	-	-	-	-
EU 1d	Categorised as International organisations in SA	-	-	-	-	-
2	Institutions	-	-	1,681	1,681	1,681
3	Equity	-	-	38	38	38
5	Corporates	-	-	1,644	1,644	1,644
5.1	Of which: F-IRB is applied	-	-	-	-	-
5.2	Of which: A-IRB is applied	-	-	-	-	-
EU 5a	Of which: Corporates - General	-	-	868	868	868
EU 5b	Of which: Corporates - Specialised lending	-	-	776	776	776
EU 5c	Of which: Corporates - Purchased receivables	-	-	-	-	-
6	Retail	8,519	-	8,671	151	151
6.1	Of which: Retail - Qualifying revolving	-	-	-	-	-
EU 6.1a	Of which: Retail - Purchased receivables	-	-	-	-	-
EU 6.1b	Of which: Retail - Other	-	-	151	151	151
6.2	Of which: Retail - Secured by residential real estate	8,519	-	8,519	-	-
EU 7a	Of which: Retail - Categorised as secured by mortgages on immovable properties and ADC exposures in SA	-	12,888	784	13,672	13,672
EU 7b	Collective investment undertakings (CIU)	-	-	-	-	-
EU 7c	Categorised as exposures in default in SA	-	427	85	512	512
EU 7d	Categorised as subordinated debt exposures in SA	-	-	-	-	-
EU 7e	Categorised as covered bonds in SA	-	-	111	111	111
EU 7f	Categorised as claims on institutions and corporates with a short-term credit assessment in SA	-	-	-	-	-
8	Others	-	-	295	295	295
9	Total	8,519	13,315	13,410	18,206	18,206

The total RWA for credit risk would increase by € 4.8 billion before applying the output floor if the standardised approached were used on all exposures including the IRB exposures.

EU CMS2 - Comparison of modelled and standardised risk weighted exposure amounts for credit risk at asset class level 30-9-2025

		a	b	c		d	EU d
		Risk weighted exposure amounts (RWEAs)					
in € millions		RWEAs for modelled approaches that institutions have supervisory approval to use	RWEAs for column (a) if re-computed using the standardised approach	Total actual RWEAs	RWEAs calculated using full standardised approach	RWEAs that is the base of the output floor	
1	Central governments and central banks	-	-	-	-	-	-
EU 1a	Regional governments or local authorities	-	-	21	21	21	21
EU 1b	Public sector entities	-	-	34	34	34	34
EU 1c	Categorised as Multilateral Development Banks in SA	-	-	-	-	-	-
EU 1d	Categorised as International organisations in SA	-	-	-	-	-	-
2	Institutions	-	-	1,569	1,569	1,569	1,569
3	Equity	-	-	38	38	38	38
5	Corporates	-	-	1,639	1,639	1,639	1,639
5.1	Of which: F-IRB is applied	-	-	-	-	-	-
5.2	Of which: A-IRB is applied	-	-	-	-	-	-
EU 5a	Of which: Corporates - General	-	-	838	838	838	838
EU 5b	Of which: Corporates - Specialised lending	-	-	801	801	801	801
EU 5c	Of which: Corporates - Purchased receivables	-	-	-	-	-	-
6	Retail	8,190	-	8,342	151	151	151
6.1	Of which: Retail - Qualifying revolving	-	-	-	-	-	-
EU 6.1a	Of which: Retail - Purchased receivables	-	-	-	-	-	-
EU 6.1b	Of which: Retail - Other	-	-	151	151	151	151
6.2	Of which: Retail - Secured by residential real estate	8,190	-	8,190	-	-	-
EU 7a	Of which: Retail - Categorised as secured by mortgages on immovable properties and ADC exposures in SA	-	12,603	773	13,375	13,375	13,375
EU 7b	Collective investment undertakings (CIU)	-	-	-	-	-	-
EU 7c	Categorised as exposures in default in SA	-	413	93	506	506	506
EU 7d	Categorised as subordinated debt exposures in SA	-	-	-	-	-	-
EU 7e	Categorised as covered bonds in SA	-	-	110	110	110	110
EU 7f	Categorised as claims on institutions and corporates with a short-term credit assessment in SA	-	-	-	-	-	-
8	Others	-	-	410	410	410	410
9	Total	8,190	13,016	13,029	17,855	17,855	17,855

2.4 ICAAP information

Capital adequacy lifecycle

The risk management lifecycle applies to capital management by:

1. Identifying risks within the scope of capital adequacy: we continuously aim to identify that all potential, material and emerging risks are within the scope of capital adequacy. For example, we perform an independent risk review of all relevant capital adequacy-related proposals.
2. Assessing the risk profile against the risk thresholds by comparing the risk exposure to the available capital from own funds and MREL eligible liabilities: as part of the ICAAP, we continuously assess the adequacy and effectiveness of the risk

management framework as far as capital adequacy and its compliance with internal policies and the risk appetite framework are concerned. ICAAP provides input for the ECB's SREP. We present the outcome of the assessment in the annual ICAAP Capital Adequacy Statement (CAS) report. The assessment of (expected future) capital exposure and developments also comprises the:

- recalibration of the capital management strategy;
- definition of actions in the capital and liquidity plan that we draw up at least once a year, giving substance to the anticipated capital needs ensuing from the Financial Plan & Budget (FP&B). As the FP&B has a multi-year horizon, we make forecasts of relevant risk indicators and compare these with the internal

thresholds. We work out various scenarios, taking into account the anticipated effects of future regulations when applicable;

- update of forecasts in the capital part of the monthly Balance Sheet Management (BSM) Asset and Liability Committee (ALCO) report. The BSM ALCO report is reviewed by the second line with specific attention to the current risk profile versus the risk thresholds and a forward-looking assessment;
 - regular stress tests to provide insight into the key vulnerabilities and to assess the resilience of the capital position to severe but plausible adverse (economic) conditions. The results are used to set the risk appetite thresholds.
3. Defining the risk response to capital adequacy: every year, we determine the RAS for capital adequacy in conjunction with the bank's general risk appetite and strategic objectives. To monitor capital adequacy, we use specific risk indicators and determine the level above which we feel comfortable based on the risk appetite for capital adequacy.
 4. Monitoring capital adequacy: the Treasury Committee monitors early warning indicators defined in the RAS for capital adequacy on a regular basis. The ALCO monitors the actual and forecasted development of the RAS indicators in the BSM ALCO report on a monthly basis.
 5. Identifying residual risk: not all risks to capital adequacy are identified or fully managed at all times, because of expected or unexpected balance sheet or regulatory developments. By following the capital adequacy lifecycle, we intend to identify these risks and formulate a risk response.
 6. Reporting capital adequacy indicators: we prepare regulatory and internal reports to measure, monitor and manage the bank's capital adequacy on an ongoing basis.

CRR/CRD requirements

With effect from 1 January 2025, ASN Bank is required to meet a minimum total Overall Capital Requirement (OCR) of 16.2%, of which at least 11.1% has to be composed of Common Equity Tier 1 (CET1) capital. This obligation stems from the Supervisory Review and Evaluation Process (SREP) performed by the ECB in 2025.

The OCR includes the 8.0% Pillar 1 capital requirement and the 3.5% Pillar 2 capital requirement – together forming the Total SREP Capital Requirement (TSCR) – and the Combined Buffer Requirement (CBR). The Pillar 2 capital requirement is unchanged relative to the previous SREP decision.

CRR/CRD requirements as from 1 January 2025

	Total capital	of which Tier 1 capital	of which CET1 capital
Pillar 1 requirement	8.00%	6.00%	4.50%
Pillar 2 requirement	3.50%	2.63%	1.97%
Total SREP Capital Requirement (TSCR)	11.50%	8.63%	6.47%
Capital conservation buffer	2.50%	2.50%	2.50%
O-SII buffer	0.25%	0.25%	0.25%
Countercyclical capital buffer	1.91%	1.91%	1.91%
Combined Buffer Requirement (CBR)	4.66%	4.66%	4.66%
Overall Capital Requirement (OCR)	16.16%	13.29%	11.13%

The CBR, to be held in the form of CET1 capital, consists of a capital conservation buffer, a capital buffer for Other Systemically Important Institutions (O-SII buffer) and a countercyclical capital buffer. As at 1 January 2026, ASN Bank's capital conservation buffer equalled 2.50% and the O-SII buffer 0.25%. The countercyclical capital buffer for exposures to counterparties is currently 1.91%. This buffer is intended to protect banks against cyclical risks arising from excessive credit growth.

Based on the current capital requirements and the capital position at year-end 2025, the Maximum Distributable Amount (MDA) trigger level amounted to 11.8% of CET1 capital, including a 0.5% Additional Tier 1 (AT1) shortfall and 0.2% Tier 2 (T2) shortfall. In case of a breach of the MDA trigger level, the maximum amount available for dividend payments and/or AT1 coupon distributions would be restricted in accordance with the Capital Requirements Directive (CRD).

ASN Bank is not classified as G-SII (global systemically important institutions).

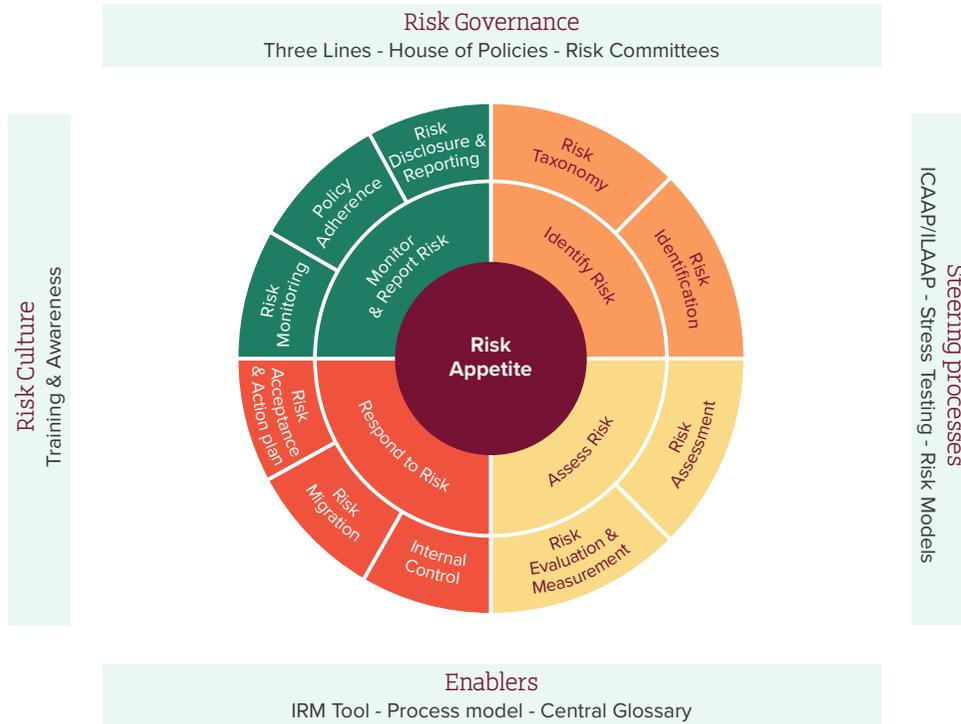
3. Risk management objectives and policies

3.1 Institution risk management approach

Risk management structure

ASN Bank is an accessible and forward-looking bank with an eye for people, society and the future. We contribute to financial solutions for our customers. We pay particular attention to sustainability, financial well-being and good and affordable housing.

Risk management framework



elements, and serves as a generic tool for both the first line and second line. The RMF ensures consistent terminology and provides a compatible methodology for the identification, assessment, measurement, monitoring, management and reporting of key risks.

In 2025, ASN Bank undertook several important steps to further strengthening its RMF, updating the bank's policy management approach (House of Policies), enhancing the risk management cycle (RMC) and refining its issue management processes.

The risk management cycle is designed to support evaluation of the effectiveness of the design and operation of the internal risk management and control system.

Internal risk management and control system

The RMC, as the central part of the RMF, provides a methodology for a sound internal risk management and control system, describing the necessary instruments, and using consistent terminology. It is designed to support the evaluation of the design and effectiveness of the internal risk management and control system.

The ExBo has assessed the effectiveness of the internal risk management and internal control system in relation to operational, compliance and reporting risks during the past financial year. The basis for this assessment is the overall risk mitigation for strategic risks, financial risks and non-financial risks. With respect to internal control over for financial reporting, the bank relies on the outcome of the evaluation of high rated issues, operational incidents, and identified deviations from the proper functioning of the internal control system. These evaluations have resulted in defined areas of attention for 2025 including mitigating measures.

The bank used different approaches for risk mitigation during 2025:

- For the mitigation of strategic risks, a Strategic Risk Assessment was performed to identify strategic and emerging risks and to define actions to mitigate these risks at both strategic and operational organisation levels. The top risks were assessed and aligned with the risk taxonomy and aligned with the risk appetite to the potential impact of any such top risks.
- For the mitigation of financial risks, the bank used additional processes and instruments to mitigate, such as the Financial Risk Assessment and regular monitoring and comparison with RAS limits. Consistent with their mandates, responsible risk committees (Credit Committee, ALCO and ExBo) can decide on measures to steer the risk position towards risk appetite when necessary.
- For the mitigation of non-financial risks, significant effort was put into the improvement of several key processes and instruments, such as the issue

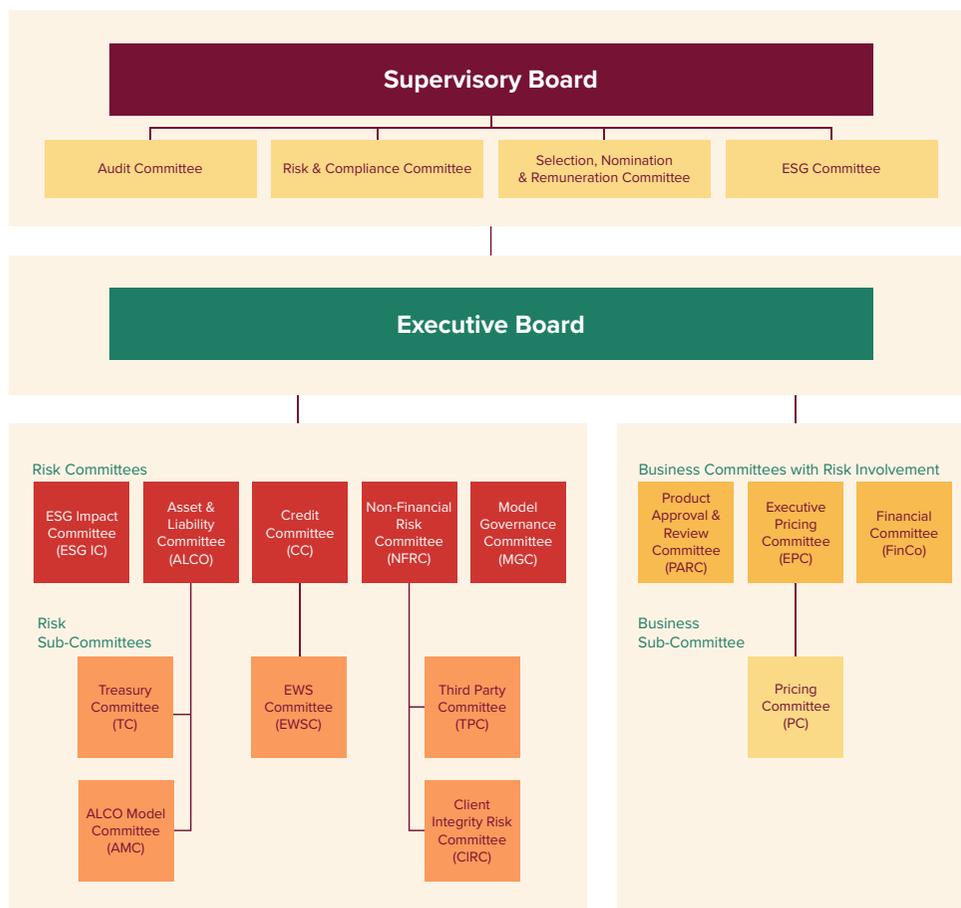
ASN Bank applies the COSO¹ Enterprise Risk Management (ERM) Framework. The Risk Management Framework (RMF) enables ASN Bank to properly apply all COSO ERM

¹ The Committee of Sponsoring Organizations of the Treadway Commission, www.coso.org

management process, the financial and IT key control frameworks, the risk assessment approach and the control testing standard. We will continue with the improvements in 2026.

Risk governance

Risk committee structure



The bank’s risk governance is based on the three lines model. In this model, the first line, i.e. the business, is responsible for setting up and executing its own processes and for the identification and assessment of the risks involved. The business units measure the risks against the defined risk appetite and report on relevant risks. The second line, consisting of the risk management and the compliance function, supports the first line, sets the frameworks, gives advice and monitors if the business units take their responsibility. More specifically, the compliance function monitors how ASN Bank complies with laws and regulations and internal policies on integrity. The third line, the audit function, independently assesses the effectiveness of the first and second line.

The ExBo is ultimately responsible for risk management within the organisation. Various risk committees support the ExBo in fulfilling this task.

The Supervisory Board is charged with the supervision of the ExBo and in that role is advised by the Audit Committee, the Risk & Compliance Committee, the Selection, Nomination & Remuneration Committee and the ESG Committee, for more information on risk committees, see Section [Leadership and governance](#) in the Annual Report 2025.

The bank’s risk management function is an integral, but independent, part of the organisation. On the one hand, the risk management function informs, challenges, takes positions and gives solicited and unsolicited advice, and on the other hand it is essential that they listen to and liaise with stakeholders. They take into consideration all stakeholders and try to find solutions that do justice to the various stakeholder interests and contribute to the realisation of the strategy.

The compliance function oversees ethical employee conduct within the organisation. The Ethics Committee enables such oversight.

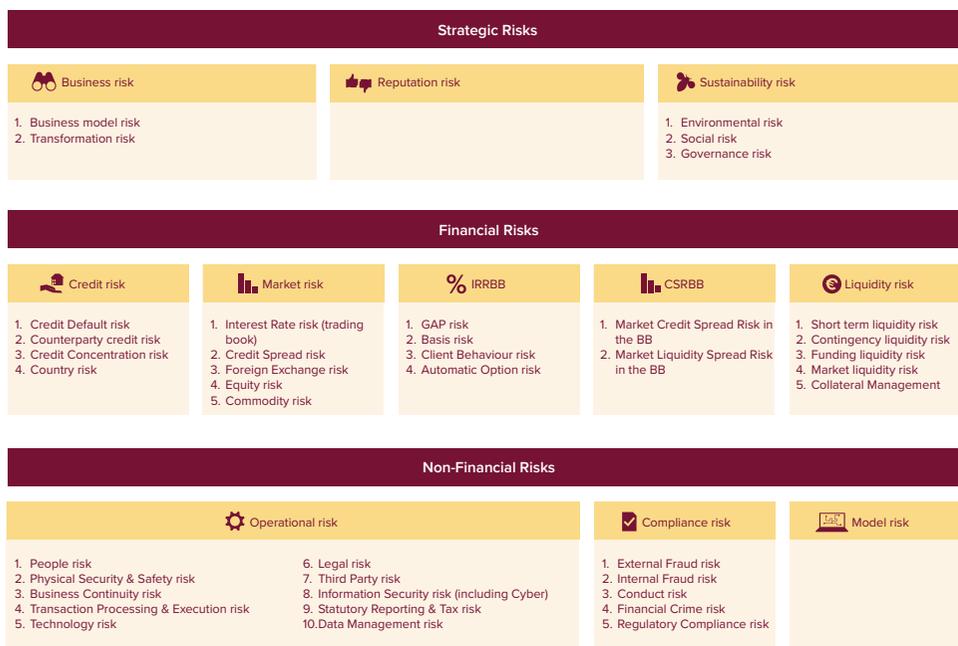
The compliance function develops and executes an integrity awareness plan for all employees on an annual basis. This plan includes ongoing training and communication initiatives such as workshops, e-learning courses, intranet publications and dilemma-management.

The bank has five risk committees and three business committees. Each risk committee is chaired by an ExBo member and is responsible for the monitoring and steering of exposures in one or more risk type of the risk taxonomy. Business committees address questions that involve aspects of various risk types and are chaired by an ExBo member. The third line has a standing invitation for all risk and business committee meetings but has no voting rights. Both types of committees are made up of officers who represent the business and manage the risks, and officers from

the risk management function and/or compliance function, who monitor risks and the risk-related response.

Decision-making related to, or with impact on, risk management follows the lines of risk governance and is assessed against risk guidelines. If risk limits are exceeded, or if the risk appetite is not otherwise observed, risk committees will discuss the issue and take subsequent remedial actions. A risk committee may escalate and present a point of discussion to the ExBo. The risk management function regularly facilitates a complete self-assessment for all risk committees and business committees, defining areas for improvement where necessary.

Risk Taxonomy



ASN Bank has a process in place to identify risks that are material. The risks are included in a comprehensive internal risk inventory. All risks that may have a material impact on our strategic objectives and viability are included in the bank’s risk taxonomy, clustered into three categories:

- Strategic risks,
- Financial risks and
- Non-financial risks.

ASN Bank carries out regulated and supervised activities that may be impacted by developments. These developments and related risks may prevent us from achieving our strategic objectives. For more details on our strategic objectives, see the Section [Our strategy](#) in the Annual Report 2025.

ASN Bank annually carries out a Strategic Risk Assessment (SRA), which identifies and assesses the most important risks in relation to its strategy. Refer to the Section [Strategic risks](#) for an overview.

We assess the material risks and will adjust the risk taxonomy when necessary. If so, we will take measures to align our strategy and risk appetite to the potential impact of any such top risks.

Risk Appetite Framework

The Risk Appetite Framework (RAF) is an integral part of ASN Bank’s Risk Management Framework and the structured approach the bank uses to define, communicate and manage the amount of risk it is willing to take in pursuit of its strategic objectives. It defines Risk Appetite governance and presents the approach and methodology by which the risk appetite is identified, measured, determined, allocated, supervised, communicated and reported. The Risk Appetite Framework outlines the bank’s appetite for all key risks.

The Supervisory Board, supported by its relevant committees, is responsible for setting and overseeing the bank’s risk appetite, ensuring an effective internal control environment is operated by the ExBo.

Key elements of the ASN Bank’s Risk Appetite Framework are:

- **Risk Appetite Statement:** expresses the amount and type of risk which the organisation is generally willing to accept in order to meet its strategic and financial objectives. It reflects the bank’s mission, vision and values.
- **Risk Limit Framework:** is imposed to express the banks risk appetite and to facilitate prudent allocation of such risk appetite to individual risk takers or group of risk takers. The Risk Limit Framework consists of measurable metrics (key risk indicators) to monitor the Risk Profile and to communicate the boundaries to senior management.
- **Risk Appetite setting and calibration:** Risk Appetite is set at an aggregated bank-wide level across the different risk categories. The Risk Appetite Framework

provides the principles for cascading this risk appetite down into the organisation. The strategic risk assessment and materiality assessment acts as the starting point for the yearly review, setting and calibration of the Risk Appetite.

- **Risk Appetite monitoring and reporting:** To validate that the bank remains within the set risk appetite of the defined risk categories it reports the risk profile of ASN Bank monthly via the KRIs and accompanying limits to the applicable Risk Committees. On a monthly basis the Level 1 Risk Appetite Statement KRIs are submitted to the Executive Board via the Integrated Risk Report reflecting the exposure of the bank to the set risk appetite. Risk Appetite escalation and breach management aligns with escalation for economic capital and recovery & resolution planning.

Areas of attention

During 2025, ASN Bank implemented multiple improvements in the RMF, as a deliverable of the Risk & Compliance Transformation programme. A new House of Policies was designed, the RAS process updated, and a new risk reporting cycle was in place.

The bank has updated its methodology enhancing requirements for risk appetite setting and calibration and clarifying roles and responsibilities in relation with risk appetite. Additionally, the bank improved the governance cycle including risk appetite review and approval in (Risk) committees and the ExBo.

Also, the bank aligned its risk committee structure to the new ASN Bank organisation as described in the paragraph Risk Committee Structure.

At the end of every year, the bank executes an internal review of all identified deviations to a proper functioning of the internal control system. These deviations are translated into areas of attention, which are ultimately reviewed by the ExBo for their overall impact and required actions.

Below is an overview of the areas of attention, resulting from our internal risk assessments, including mitigating measures.

Risk management and risk culture

The bank is continuously improving the risk culture by establishing and translating a healthy and mature risk culture into effective behaviour throughout the entire organisation in an integrated and comprehensible manner.

During 2025, many improvements in the renewed Risk Management Framework were implemented as part of the Risk & Compliance Transformation programme.

A new House of Policies was designed, the Risk Appetite Statement process updated, Regulatory Change process (including installation of a Regulatory Change Board) and a new risk report and cycle is set in place. The risk management organisation has also been strengthened by focusing on additional knowledge and experience, where necessary from outside the organisation. Further mitigating measures focused on strengthening risk awareness and behavioural alignment, including bank wide masterclasses on the business model, regulatory environment and key risks, complemented by interactive, values-based discussions to support risk informed decision making.

For 2026, we will further strengthen the culture, further interventions have been planned as part of our company wide corporate culture. In addition, we will continue to operationalise and improve the risk and compliance management processes within the first and second line following the roll-out of the defined road maps. We will also focus on the improvement of Control testing, Risk reporting, implementation of the Model Risk Management Framework, setting up the Independent Validation Unit, and regulatory monitoring.

The evolution towards a risk mature organisation will require ongoing management attention and perseverance.

Data management

The control framework for Data risks is being improved. While the necessary data capabilities are defined, further strengthening awareness, knowledge, and skills related to data throughout the organisation requires continued attention.

To address the identified need to further strengthen data awareness, knowledge and skills across the organisation, the Data Management Risk policy was updated and is translated to underlying standards and controls. Implementation of this policy is supported by a newly developed data Target Operating Model which clarifies data related roles, responsibilities and accountabilities across business units and data domains. This operating model serves as a foundation for embedding data governance requirements into daily activities and supports targeted training and capability development.

For 2026, the bank is fully focused on realising being in control for BCBS 239 for financial and non-financial reporting, in line with the roadmap planning.

Models

The bank is continuing to strengthen its alignment with regulatory requirements and supervisory expectations, with particular focus on credit risk models. Initiatives are

underway to further enhance model quality, data and methodological foundations, and governance across the relevant domains.

These improvements are expected to reinforce the accuracy and robustness of parameters used for RWA and provisioning, support a more risk sensitive capital framework, and enhance the quality and depth of insight into the bank's underlying risk profile.

The execution of the Path to Green (P2G) for model risk focuses on implementing structural enhancements in the Data & IT processes and addressing findings. The execution is monitored in the Model Governance Committee (MGC). The Model Risk Management House of Policies is approved in accordance with internal governance. The implementation will further strengthen the model risk management framework and enhance the governance and effectiveness of the model life cycle.

Laws & Regulations, and Supervisory expectations

Ensuring alignment with applicable laws and regulations remains a key priority for the bank. Ongoing initiatives focus on the implementation and embedding of regulatory requirements across areas such as AML, data protection (GDPR), climate risk, data management, and risk and provisioning models, including IFRS 9.

Regulatory risks are mitigated through an operational Regulatory Change Management process, including active engagement initiatives such as roadshows. Legal is closely involved in all supervisory files, ensuring timely interpretation and application of regulatory requirements.

In addition, first line compliance and activity reporting is aligned and subject to review by the second line, with further refinement of this process ongoing.

Anti-financial crime

In the area of Wwft and Sanctions Act compliance, the bank is continuing to strengthen the effectiveness of customer due diligence and ongoing monitoring processes. At the reporting date, these processes are operational, but their execution requires further enhancement to fully meet our obligations and supervisory expectations.

AFC risks are mitigated through strengthened governance and oversight. During 2025, the Chief Financial Crime Officer (CFCO) role was established and embedded in the Executive Board, reinforcing senior management accountability for AFC matters. In addition, the AFC budget has been structurally integrated into the standard investment and operational planning (IP/OP) process.

Planned AFC remediation actions for 2025 have been realised. The remediation plan has been evaluated and translated into an operational roadmap for 2026. Compliance is further embedding its second line role through the Quality Management Framework, enhancing ongoing oversight and challenge.

Privacy

The bank is developing further insight into its privacy-related risks. Data cleansing and data retention remain an ongoing area of attention into 2026, alongside continued focus on the security of personal data exchanges.

Privacy risks are mitigated through a structured roadmap that is actively being implemented. Further embedding and alignment with the ISO privacy framework is planned for 2026, supporting continued strengthening of privacy controls.

Safety, continuity and cyber

In the current reality we are aware of the continuous threat of a possible cyber-attack. Also, we face the risk that our IT systems are unable to keep up with market and supervisory developments, which could lead to unrealised strategic priorities.

These risks are mitigated through continuous strengthening and transformation of the IT landscape, focusing on resilience, security and flexibility. Modernisation of the IT environment remains a strategic priority for 2026, further enhancing the bank's ability to deliver high quality services and respond to regulatory and market developments.

Supervisory actions

At the end of January 2025, De Nederlandsche Bank (DNB) imposed a fine of € 5 million for shortcomings in the bank's organisation and operations to comply with the Anti-Money Laundering and Anti-Terrorist Financing Act (*Wet ter voorkoming van witwassen en financieren van terrorisme - Wwft*). At the same time, DNB also imposed a fine of € 15 million for shortcomings in risk management as a result of not complying with the sound business operations-related requirements under the Financial Supervision Act (*Wet op het financieel toezicht - Wft*).

The bank is currently in the process of strengthening its risk management and ensuring sound business operations, to comply with *Wwft* and *Wft* requirements. This means that:

- A risk transformation programme was initiated to improve our risk management processes. As from July, required remediations have been incorporated in the improvement planning of the restructured risk management organisation. The risk management organisation has also been strengthened by focusing on additional knowledge and experience, where necessary from outside the organisation.

We are fully committed, and have set to work, to sustainably and adequately address the identified deficiencies in risk management to comply with laws and regulations. The bank is prioritising improved monitoring, reporting and tightened escalation mechanisms.

- With effect from 1 February 2025, a renewed AFC organisation has been implemented. The bank introduced a simplified organisational structure across all three lines with clear mandates and responsibilities to manage and mitigate the AFC risks that the bank is potentially exposed to. We are committed to a healthy risk culture and managing our customer portfolio within the boundaries of our risk appetite.
- During 2025 ASN Bank has made substantial progress in reducing AFC risks by:
 - Advanced in-depth insights in AFC risks as part of our SIRA 2024 and the necessary requirements to further mitigate these risks.
 - Reduction in operational backlogs for transaction monitoring and customer due diligence.
 - Further improvements in sanctions screening processes and systems.
 - Start of large-scale customer data remediation and customer risk reassessment.
 - Development of AFC standards and risk frameworks in line with market practices.

For more detailed information on the Anti-financial crime (AFC) remediation, see Section [Anti-financial crime](#) in the Sustainability statements in the Annual Report 2025.

Overall, we have made good progress in strengthening our remediation efforts in anti-money laundering and risk management. We maintain a continuous dialogue with our supervisory authorities on the progress of all ongoing improvements.

Risk culture and awareness

A strong risk culture identifies, manages and controls relevant risks in line with the bank's vision, risk appetite and customer needs, all within the applicable legal frameworks. It shapes management and employees' day-to-day decisions and fosters an atmosphere of open communication and constructive challenge which is a prerequisite for effective risk management and risk awareness. We aim for the envisaged risk culture to be endorsed by the entire organisation. This starts by using the bank's RMF policy that describes our overall risk management governance.

In 2025, a new vision on risk culture was developed and rolled out, intended to strengthen the risk culture within ASN Bank. Multiple initiatives were rolled out to raise risk awareness and provide guidance towards desired behaviour like 'whole system in the room' workshops to strengthen cooperation between first and second line and dilemma management. Additionally, all employees are expected to include a goal regarding risk awareness in their performance cycle.

In January 2025, we measured the perceived integrity and risk culture within ASN Bank with an employee survey. This survey included the main elements from ASN Bank risk culture model and EBA requirements. The results showed that employees experience an improvement in certain areas of the risk culture, mainly in leading by example (2025: 74.8%; 2023: 73.6%) and feasibility (2025: 78.3%; 2023: 77.6%). Commitment (94%), discussability (80%) and accountability (77%) remained at the same level whereas transparency (2025: 65.2%; 2023: 66.9%) and enforcement (2025: 80.3%; 2023: 83%) showed a small decline.

Risk awareness is the ability to spot risks that could impact the organisation. We raise risk awareness among our employees by helping them identify, assess and respond better and more consciously to (potential) risks. We do this by providing training courses, workshops and e-learning programmes as well as by sharing risk awareness-related success stories and lessons learned with our employees. This risk awareness framework is carefully maintained and continuously improved, and new rules and regulations are embedded into the different policies that are accessible to employees in the policy framework. We encourage a critical consideration of the risk-return ratio by focusing on the interests of our customers, society, our employees and the shareholder.

Internal code of conduct

We expect our employees to show good corporate behaviour. They are guided in this by our Code of Conduct: 'Common Sense, Clear Conscience', which focuses on moral dilemmas and how to deal with them. A well-spread network of confidential counsellors offers staff the opportunity to raise concerns about malpractices.

Remuneration policy

ASN Bank pursues a remuneration policy based on the strategy of building strong customer relationships and increasing its social impact. We do not grant any variable remuneration to discourage employees from taking undesirable risks that may give priority to short-term individual interests over long-term collective objectives. For more detailed information on our remuneration policy, see Section [Remuneration report](#) in the Annual Report 2025.

Stress testing

In addition to monitoring our risk indicator-based risk appetite, we use stress tests to gain insight into the sensitivity to changes in the underlying causes and the interrelationship of risks. Several times a year, we calculate a severe yet plausible macroeconomic scenario to determine its effects on aspects such as our profitability, capital and liquidity position. In 2025, we also performed a climate stress test to gain insight in the impact of climate change resulting from both physical and

transitional climate-risk drivers. We carry out different types of stress tests to reveal potential vulnerabilities.

For the use of stress tests in relation to credit risk, market risk, liquidity risk and capital adequacy, see the related sections in the Annual Report 2025. For more information on the continued development of climate stress testing, see Section [Sustainability risk - Areas of focus and activities](#).

Strategic risks

ASN Bank distinguishes three strategic risks, i.e. business risk, reputational risk and sustainability risk.

This section provides an overview of these risk types and their developments in 2025. At the end of this section the ESG Risk Assessment of strategic risks are summarised.

Business risk

Business risk is defined as the risk that the ASN Bank's profitability deviates from limits that may negatively impact the viability of the bank's business model and sustainability of the bank's strategy. Business risk-sub types are:

- Business model risk and
- Transformation risk

Business model risk

Business model risk is defined as the risk that the profitability of ASN Bank deviates from limits that may have a negative impact on the viability of the bank's business model and sustainability of the bank's strategy.

Developments in 2025

Net interest income in 2025 decreased, driven by lower net interest income on cash management activities, due to less volume year-on-year and the decline in the ECB deposit facility rate.

In 2025, both the mortgage and savings market grew. Despite a competitive domestic market, the commercial interest income on residential mortgages increased, driven by portfolio growth in combination with a stable portfolio margin in basis points (bps). Commercial interest income on savings remained virtually stable.

In these markets, we managed to reduce ASN Bank's excess liquidity as loan growth outpaced the increase in retail deposits. As a result, our loan-to-deposit ratio improved, which makes us less sensitive to future changes in short-term interest rates. In the coming year, we will continue our efforts to optimise our balance sheet.

Total operating expenses, adjusted for incidental items, in 2025 consisting of restructuring charges for our transformation programme and, in 2024 also for a provision related to our anti-financial crime (AFC) remediation programme, increased due to higher consultancy costs. These costs mainly related to our transformation programme and addressing deficiencies in risk management, and to higher IT costs. In addition, expenses in 2024 included a non-recurring gain related to an adjustment

in recoverable VAT in previous years. These elements were partly offset by lower regulatory levies and lower staff costs.

Staff costs decreased, despite pressure from (wage) inflation and an increase in temporary FTEs covering remediation work, focusing on anti-financial crime and risk management-related topics. The decrease in staff costs was driven by structural cost savings from our transformation programme. Transformation-related cost savings of around € 35 million were realised, this equates to the € 70 million cost savings on an annualised basis, as announced at the end of 2024.

The next phase of the transformation will lead to an expected FTE reduction of 850–950 throughout 2026. This additional FTE reduction is anticipated to result in an additional annual structural cost saving of approximately € 80 million as of 2027.

ASN Bank has drawn up a Financial Plan & Budget for the 2026-2030 period. This plan sets mission-driven objectives for growth and improvement and includes efficient capital management. At the same time, it carves out a path with actions to achieve our financial objectives.

For more information on ongoing and future actions refer to Section [Strategy and performance](#) in the Annual Report 2025.

Transformation risk

Transformation risk is defined as the incapability to (rapidly) transform the business in response to changes in the market such as the entry of new competitors, the development of new industry-changing technologies, regulatory requirements or shifts in overall market conditions that may negatively impact the viability and sustainability of the bank's business model.

Developments in 2025

We achieved significant progress on our transformation, including the successful brand merge, which led to cost savings of € 70 million on an annualised basis through migrating 2.3 million customers, streamlining the branch network, and reducing the number of FTE.

Two primary transformation risks are: 1) the ability to sustain the pace of execution and 2) the possible transformation delays. The first risk is driven by the magnitude and scope of simultaneous changes across multiple domains and organisational complexity. The second risk is due to increased interdependencies between changes across systems, processes, and organisational structures in 2026.

To mitigate these risks, ASN Bank established a Transformation Office, which has proven effective in delivering risk mitigation through strengthened governance structures.

The transformation is a centrally orchestrated process and continuously manages activities, sequences the various transformation initiatives, and flags bottlenecks to ensure optimal delivery. Risk management is embedded as a core practice, to assure strong daily customer service and prevents transformation to interfere with the ongoing remediation efforts.

Reputational risk

Reputational risk is the risk that ASN Bank becomes subject to negative public opinion due to internal or external events that may negatively impact the bank's ability to attract and retain (the support of) customers, employees, society, counterparties, shareholders and supervisory authorities. This may be caused by internal and/or external events and/or developments, which may subsequently result in the loss of stakeholder support and motivation and a direct or indirect financial loss.

Reputational risks may be related to our own conduct in events that are subject to the public's attention, but also to policy decisions, our day-to-day actions and issues regarding products, or the actions of individual employees. External developments may also affect reputational risk as they may change stakeholder expectations of ASN Bank. The Corporate Communications department actively manages issues at sector and bank level by monitoring and mitigating current and upcoming internal and external events that may result in reputational damage for the bank and its brands. In addition, ASN Bank's Crisis Communication Plan (CCP) includes (press) policies, communication strategies and key messages for various crisis communication scenarios. The CCP is tested and updated annually. ASN Bank measures reputation scores on a quarterly basis. They are conducted by RepTrak, the leading global reputation research company. Since the transition to one brand on 1 July, reputation was measured for ASN Bank, RegioBank and BLG Wonen in the third quarter of 2025, and from the fourth quarter of 2025 onwards is measured exclusively for ASN Bank.

Developments in 2025

2025 marked many changes. From the rebranding to one brand 'ASN Bank', the closing of SNS branches in March, to the reduction of over 700 FTEs, and the announcement in November of the new strategy and an additional reduction of 850-950 FTEs throughout 2026.

In 2025, the customer-weighted average NPS decreased to -7 (year-end 2024: +4). Key drivers for the decline were a greater than expected impact from the transformation and rebranding, the reduction of branches and mandatory customer re-identification

procedures. In our new strategy, we are targeting the highest NPS position among the major systemic Dutch banks. At year-end 2025, we ended in joint second position, driven by the transformation impact.

The above-mentioned developments did not lead to significant fluctuations in the bank's 2025 reputation scores. The RepTrak research shows that ASN Bank still outperforms on relevant reputational drivers such as conduct, products and services and citizenship. As a result ASN Bank holds the top position in the Dutch banking industry, as well as on ESG-related themes.

Sustainability risk

Sustainability risk is the risk of financial and/or reputational damage as a result of Environmental, Social and Governance (ESG) developments. Developments related to sustainability risk are elaborated on in the Section [14 ESG risks and other sustainability disclosures](#).

Managing and hedging risk

Our capital strategy incorporates the objective of having a solid capital position at our disposal to support ASN Bank's corporate strategy, combined with an adequate Return on Equity (RoE).

We assess the risk profile against the risk thresholds by comparing the risk exposure to the available capital from own funds and MREL eligible liabilities: as part of the Internal Capital Adequacy Assessment Process (ICAAP), we continuously assess the adequacy and effectiveness of the risk management framework as far as capital adequacy and its compliance with internal policies and the risk appetite framework are concerned. Every year, we determine the Risk Appetite Statement (RAS) for capital adequacy in conjunction with the bank's general risk appetite and strategic objectives. To monitor capital adequacy, we use specific risk indicators and determine the level above which we feel comfortable based on the risk appetite for capital adequacy.

ASN Bank is concentrated in residential mortgage loans in the Netherlands. The Dutch residential mortgage market is considered a low-risk segment. Other loan portfolios on the balance sheet, much smaller in size, are:

- Other retail loans: consumer loans including credit facilities and personal loans
- SME loans
- Other corporate and government loans, consisting of:
 - Sustainable finance loans
 - Private placement loans

ASN Bank has a comprehensive credit risk monitoring framework, allowing it to monitor, analyse and manage the credit risk in relation to the risk appetite. We have developed a framework to actively monitor concentration risks within the portfolios. As part of credit risk management, we internally assess and monitor the credit standing of our customers i.e. borrowers or counterparties. In this process we estimate the probability of our customers being unable to meet their contractual payment obligations arising from the loan agreement, as such inability could result in a potential financial loss for the bank. Monitoring takes place throughout the distinct phases of the Credit Life Cycle.

Over the past years the credit risk of ASN Bank's portfolios decreased due to the strong economic situation of the Netherlands. The unemployment rate is low, salaries increased, house prices increased, and the customer interest rates are favourable. As a result the number of customers in arrears or in default remains low. Portfolio developments are in line with ASN Bank's strategy to increase market share and fit well within the risk appetite of the bank.

Also throughout 2025, interest-only mortgages had our continued attention. We explored additional de-risking measures for interest-only mortgages in the Netherlands. ASN Bank implemented processes to gather information on customers' intention to repay their interest-only mortgage and the affordability of the mortgage at maturity, aligning with ECB guidance. These measures may result in further scrutiny of the future loan volume development, impairment charges and capital.

ASN Bank does not use credit derivatives as a form of security or as an instrument to hedge credit risk.

ASN Bank conducts money and capital market transactions with various financial institutions. ASN Bank enters into derivative contracts mainly with financial institutions and qualifying central counterparties (QCCPs) to hedge the interest rate and currency risks arising from its banking activities. These products expose the bank to the risk that the counterparty of a transaction defaults before the final settlement of the transaction's cash flows. To manage this risk, the bank conducts periodic credit reviews to reassess counterparty creditworthiness and to validate that internal limits remain appropriate and aligned with the bank's risk appetite. Counterparties are continuously monitored for early-warning indicators, limit usage and other credit-related triggers.

Market risk in the banking book mainly comprises market interest rate risk and credit spread risk. Market interest rate risk is the risk that the bank's future interest income deteriorates when market rates change. This risk is inherent of a bank that provides mortgage and savings products. Liquid market instruments with direct or indirect

reference to market prices may be affected by credit spread risk. Other risks that may be qualified as market risk are limited for ASN Bank. ASN Bank has a low risk appetite for currency risk. With limited equity holdings in other companies, the equity (price) risk is small. Moreover, the banking book does not contain any exposure to commodities.

ASN Bank does not consider the trading book as a core activity, but it has to classify certain activities to the TB, as per the Capital Requirements Regulation (CRR). The trading book may contain exposure to interest rate risk, credit spread risk and currency risk. There is no mandate in the trading book for equity or commodity risk. The bank does not trade in credit default swaps. Market risk in the trading book is measured and monitored on a daily basis using Value at Risk (VaR), Expected Shortfall (ES) and dedicated stress-testing indicators. These metrics support internal risk oversight and are evaluated against formally established limits.

Currency risk is mitigated by hedging most of our foreign currency exposures through foreign exchange swaps. Currency risk is managed on a day-to-day basis. To avoid concentration risk in one single foreign currency, limits are used for the positions in each currency. These limits are reviewed periodically. All portfolios that are allowed to contain currency risk are actively monitored to ensure that they remain within the approved limits.

ASN Bank has a strong liquidity position, enabling the bank to meet its financial obligations at all times. We manage our liquidity position such that we are able to absorb the consequences of bank-specific and market-wide stress factors, such as stress in the money and/or capital markets. As part of the Internal Liquidity Adequacy Assessment Process (ILAAP), we monitor our liquidity profile on a continuous basis to ensure the timely awareness of developments that may require action. To fund our liquidity needs, we seek to diversify our funding sources in accordance with our funding strategy.

Non-financial risks include operational risk, compliance risk and model risk. For the mitigation of non-financial risks, significant effort was put into the improvement of several key processes and instruments, such as the issue management process, the financial and IT key control frameworks, the risk assessment approach and the control testing standard. We will continue with the improvements in 2026.

Accounting policy

ASN Bank applies hedge accounting to ensure that its interest rate and currency risk hedge activities are appropriately reflected in the financial statements. For more information please refer to note 4 Hedging and hedge accounting in Annual Report 2025.

Management statement on the adequacy of risk management

For the concise risk statement by the management body see the Section [1.2 Key figures and Management statement](#).

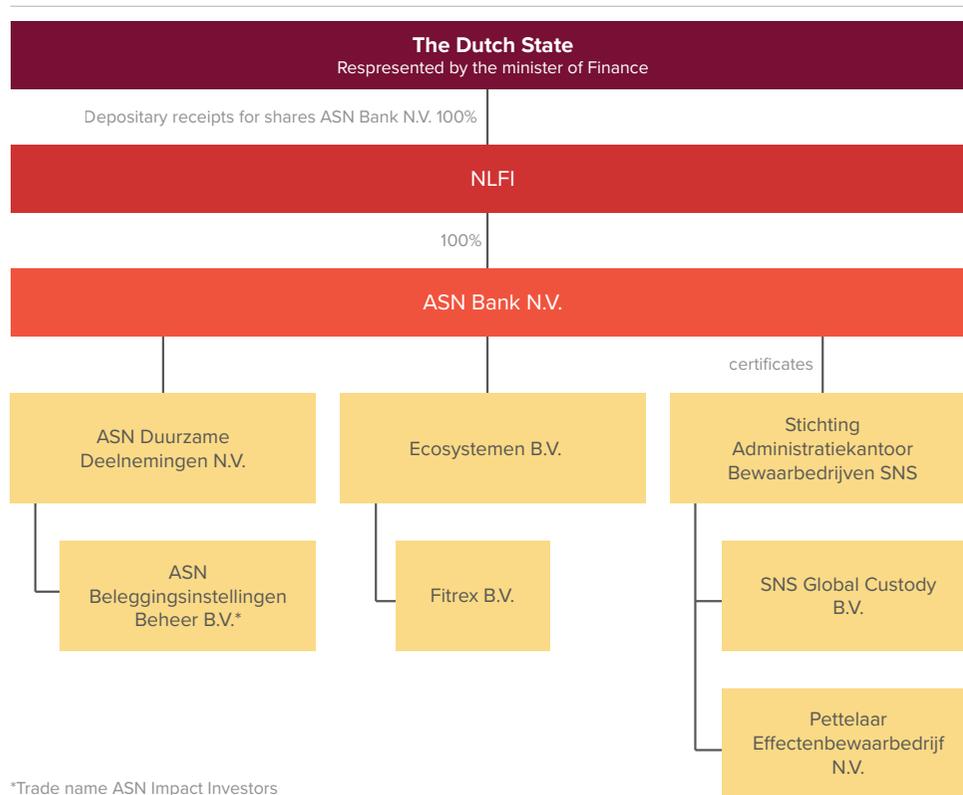
3.2 Governance arrangements

Legal structure of ASN Bank

Stichting administratiekantoor beheer financiële instellingen (NL Financial Investments; NLF) holds 100% of the share capital of ASN Bank on behalf of the Dutch State.

NLF is a foundation with a statutory task established by the Minister of Finance and was established to exercise the shareholder rights on behalf of the Dutch State in a number of financial institutions in a commercial, non-political manner and a transparent separation of interests.

The overview below comprises a statement of all wholly-owned subsidiaries as at 31 December 2025.



Internal solvency and liquidity management is exercised at the level of ASN Bank N.V.

3.2.1 Information about Governance guidelines

Executive Board

Changes to the governance structure and composition

In 2025, several changes were made in the governance structure of ASN Bank as well as in the composition of the Executive Board:

- With effect from 1 March 2025, the Executive Committee (consisting of both statutory and non-statutory members), was replaced by an Executive Board (ExBo) with statutory members only.
- On 1 March 2025, the position of CFO was added to the Executive Board with Gwendolyn van Tunen, already appointed on a non-statutory basis as CFO, now serving as a statutory member of the ExBo.
- On that same date, Isold Heemstra joined the ExBo as CCO and statutory member.
- Subsequently, on 1 July 2025, Isold Heemstra was appointed as COO with the CCO title ceasing to exist.

Composition of the Executive Board as at 31 December 2025

Name		Appointed until
Roland Boekhout	CEO	GMS 2028
André Haag	CFO	GMS 2026
Saskia Hoskens	CRO	GMS 2028
Isold Heemstra	COO	GMS 2029
Gwendolyn van Tunen	CFCO	GMS 2028

Roles and responsibilities

ASN Bank has a two-tier governance model consisting of a Supervisory Board and an Executive Board (ExBo). The Supervisory Board performs its oversight and advisory role 100% independently, in accordance with applicable laws, regulations and corporate governance standards. The ExBo is ASN Bank's statutory managing board (statutair bestuur) within the meaning of Section 2:129 of the Dutch Civil Code and is entrusted with the management of ASN Bank. The ExBo is part of ASN Bank's management body in its executive function as defined in the Capital Requirement Directive VI (2024/1619/EU) (CRD VI).

The ExBo is charged with and responsible for (i) the day-to-day management of ASN Bank, ensuring compliance with laws and regulations and the adequate financing of its activities; (ii) the continuity of ASN Bank and its business, aimed at sustainable long-term value creation for ASN Bank and taking into account the interests of all relevant stakeholders, and (iii) implementing ASN Bank's mission, vision, strategy, risk

appetite, corporate standards and values, including business conduct and reporting its findings to the Supervisory Board, risk framework, main policies, budgets, financial and non-financial targets, with the aim to contribute to sustainable long-term value creation by ASN Bank and to build and maintain the culture required for that purpose.

The ExBo ensures close cooperation with the Supervisory Board while discharging its responsibilities and seeks supervision and advice from the Supervisory Board for the bank-wide strategy and strategy implementation. The ExBo is accountable to the Supervisory Board and to the General Meeting of Shareholders (GMS) for the performance of its duties. With respect to the latter, the ExBo develops a view on sustainable long-term value creation for ASN Bank and its business, while considering the interests of all relevant stakeholders.

Composition and diversity

In 2025, the ExBo consists of the Chief Executive Officer (CEO), Chief Financial Officer (CFO), Chief Risk Officer (CRO), Chief Operating Officer (COO), and Chief Financial Crime Officer (CFCO).

The ExBo's composition is based on ASN Bank's Diversity and Inclusion Policy which focuses on recognising and valuing both customers' and employees' diversity. The purpose of the policy is to optimally contribute to the execution of the bank's strategy. The Supervisory Board (SB) draws up job profiles for the ExBo in consultation with the ExBo itself. The job profiles specify the required knowledge, suitability, expertise, integrity and availability of the ExBo and its members. As far as education and professional experience are concerned, the profiles set out the relevant aspects of diversity and inclusion, such as nationality, age, gender and background with regard to education and professional experience.

As from 1 January 2022, the Dutch Gender Balance Act came into force. This Act requires the supervisory boards of Dutch listed companies in the Netherlands top have at least one-third male and one-third female members. Although ASN Bank is not a listed company, and its shares are privately held by NLF, the bank voluntarily applies the Gender Balance Act. In addition, ASN Bank has appropriate and ambitious targets to promote gender diversity across the organisation and is required to report on said above targets, plans and progress. ASN Bank's 2025 target has been set at a female/male ratio of between 40% and 60% at all management levels. At year-end 2025, the percentage of women on the ExBo was 40%. This percentage is in line with the Gender Balance Act.

In succession planning and when filling vacancies, ASN Bank gives due consideration to any applicable diversity requirements in its search for suitable new ExBo members

who meet the fit and proper requirements stipulated in the Dutch Financial Supervision Act (Wet op het financieel toezicht - Wft) and CRD VI.

Appointment, suspension and dismissal

Members of the ExBo are appointed and reappointed by NLFi on nomination by the SB and after approval by the supervisory authorities. Both NLFi and the SB hold the right to suspend members of the ExBo, whereas NLFi can also dismiss members of the ExBo. When considering approval the SB will take into account the advice of the Selection, Nomination and Remuneration Committee (SNRC). ExBo members are appointed and reappointed for a maximum term of four (4) years, in accordance with the rotation scheme.

When preparing the appointment and reappointment of the members of the ExBo, the SNRC and SB consider the diversity objectives laid down in ASN Bank's internal policies such as the Diversity and Inclusion Policy. To be eligible for appointment candidates are required to pass fit and proper assessments under the *Wft*. The Works Council has the right to prior consultation on the appointment of members of the ExBo. The SB notifies the GMS of the intended appointment or reappointment of an ExBo member, accompanied by the candidate's short resume, including age, gender, educational and professional background.

Further information on the suspension and dismissal procedure of the ExBo is provided in ASN Bank's Articles of Association as published on our website.

Functioning

The Articles of Association of ASN Bank contain a list of the duties of the ExBo and the rules governing its functioning. Additional practical arrangements on how the ExBo is to exercise its duties and powers are defined in the ExBo's Rules of Procedure and in the Memorandum of Understanding (MoU) between NLFi and ASN Bank.

The Rules of Procedure for the ExBo were updated on 1 March 2025 and on 1 November 2025. The ExBo meets on a weekly basis and takes decisions by a majority of votes with the CEO having a casting vote if necessary. In fulfilling ASN Bank's mission and ambition, the ExBo continuously and explicitly weighs up the interests of all stakeholders.

Personal details

The following is a concise description of the ExBo members' professional experience as at 31 December 2025:

Roland Boekhout

Chief Executive Officer

1963 – Nationality: Dutch – Gender: Male

Roland Boekhout was appointed Chief Executive Officer and Chair of the Executive Board with effect from 22 May 2024. In addition to his role at ASN Bank, Roland serves as a board member of the German-Dutch Chamber of Commerce and as board member of the Dutch Banking Association (*Nederlandse Vereniging van Banken*).

André Haag

Chief Financial Officer

1982 – Nationality: German – Gender: Male

André Haag was appointed as Chief Financial Officer and member of the Executive Board with effect from 1 August 2022. André holds no other board positions.

Saskia Hoskens

Chief Risk Officer

1970 – Nationality: Dutch – Gender: Female

Saskia Hoskens was appointed as Chief Risk Officer and member of the Executive Board with effect from 10 April 2024. Saskia holds no other board positions.

Isold Heemstra**Chief Operating Officer**

1973 – Nationality: Dutch – Gender: Male

Isold Heemstra was first appointed Chief Customer Officer and member of the Executive Board at 1 March 2025 and as of 1 July 2025 he is Chief Operating Officer. Isold also serves as a board member of ASN Duurzame Deelnemingen N.V., a 100% subsidiary of ASN Bank N.V.

Gwendolyn van Tunen**Chief Financial Crime Officer**

1965 - Nationality: Dutch - Gender: Female

Gwendolyn van Tunen was appointed as statutory Chief Financial Crime Officer (CFCO) with effect from 1 March 2025. Gwendolyn holds no other board positions.

Supervisory Board**Roles and responsibilities**

The Supervisory Board (SB) oversees, advises, challenges and supports the ExBo in the exercising of its powers and duties. The SB together with the ExBo is accountable for ASN Bank's sustainable long-term value creation, requiring members to execute their duties in a sustainable manner with due observance of the sustainable long-term viability of the strategy pursued. The SB is the part of ASN Bank's management body in its supervisory function as defined in CRD VI.

In discharging its task, the SB takes into account the dynamics in and the relationship with the ExBo and its members. The SB's early and close involvement with the ExBo is required when formulating the bank-wide strategy and targets in line with the pursued culture aimed at sustainable long-term value creation. In performing their duties, the members of the SB are guided by the interests of ASN Bank and its businesses, taking due consideration of the legitimate interests of all the bank's stakeholders.

Appointment, suspension and dismissal

Members of the SB are appointed and reappointed by the General Meeting of Shareholders (GMS), upon nomination by the SB itself. To be eligible for appointment, candidates are required to pass fit and proper assessments under the *Wft*.

The GMS and the Works Council may recommend candidates to the SB to be nominated as members of the SB. The diversity objectives laid down in ASN Bank's internal policies are taken into consideration when preparing the appointment and

reappointment of the members of the SB. The SB notifies the GMS of the intended appointment or reappointment of a member of the SB, accompanied by a short resume of the candidate, including the candidate's age, gender, educational and professional background and geographical provenance.

The SB is required to nominate a candidate recommended by the Works Council in respect of one third of the members of the SB (the 'enhanced right of recommendation'). The SB is to accept the recommendation of the Works Council unless it believes that the candidate recommended is unsuitable to fulfil the duties of a member of the SB or if the SB would not be properly composed if the appointment was made as recommended. The SB may suspend any of its members at any time. In the event of lack of confidence in the SB, the GMS may dismiss the SB in its entirety.

Further information on the appointment, suspension and dismissal procedure of the members of the SB is provided in ASN Bank's Articles of Association as published on our website.

Functioning

In performing its duties, the SB continuously weighs up the interests of all its stakeholders to fulfil the mission and ambition of ASN Bank. SB members operate independently of each other within the meaning of the Dutch Corporate Governance Code and in accordance with the de Nederlandsche Bank's (DNB) position on the independent functioning of the SB. In November 2025 ASN Bank updated the Code of Conduct. The Code of Conduct contains a conflict of interest procedure and a procedure for respectful and professional conduct. In addition, the Articles of Association contain a list of the duties and rules governing the functioning of the SB. Both the Rules of Procedure for the SB and the MoU agreed with NLF I include additional agreements how the SB should exercise its duties and powers as well as on the appointment of the Chair of the SB and the CEO. The Rules of Procedure for the SB were last amended on 1 November 2025. The SB meets at least six times a year and takes decisions by a majority of votes.

Ancillary positions and conflicting interests

Members of the SB may hold and are to disclose other positions, including directorships. CRD VI and the Dutch Corporate Governance Code (DCGC) restrict the total number of SB positions or non-executive directorships that may be held by a SB member, if the SB member also has an executive board position. It is the responsibility of the individual SB member and the SB to ensure that the directorship duties are performed properly and are not affected by any other positions held by the individual member outside ASN Bank and its group structure.

SB members are to report any (potential) conflicts of interests and to provide all relevant information relating to them. The SB, excluding the member concerned, decides whether a conflict of interest exists. If it does, the relevant member of the SB abstains from discussions and decision-making on a subject or transaction in relation to which the relevant SB member has a (potential) conflict of interest.

In accordance with the DCGC and the SB's Rules of Procedure every transaction with one or more SB members that is of material significance to ASN Bank and involves (potential) conflict of interests, will be disclosed in the management report, stating the conflict of interest.

Composition and diversity

The SB is composed in such a way that it has sufficient expertise to properly perform its duties. The SB draws up a generic profile for its members. This profile specifies the required knowledge, suitability, expertise, integrity and availability of the SB and its members.

It also sets out the relevant aspects of diversity and inclusion, such as nationality, age, gender and background in relation to education and professional experience. At the end of 2025, 40% of the SB positions were filled by women, in line with ASN Bank's objective for 2025 and the Gender Balance Act.

ASN Bank's Diversity and Inclusion Policy focuses on recognising and valuing both customers' and employees' diversity. This policy also applies to the SB. The generic profile of the SB has been approved by NLF and is published on our website. The generic profile of the SB was last amended on 1 November 2025. When a new member is appointed, the SB will propose a candidate to the GMS, taking this profile into account.

Personal details

The Supervisory Board of ASN Bank N.V. constituted of the following members as at 31 December 2025:

Gerard van Olphen

1962 – Nationality: Dutch – Gender: Male

Gerard van Olphen was appointed as a member and Chair of the Supervisory Board of ASN Bank N.V. (then de Volksbank N.V.) on 13 August 2021, and reappointed as such on 17 April 2025. Gerard is also a member of the Selection, Nomination and Remuneration Committee (SNRC) and Chair of the ESG Committee. His term of office will expire on the date of the General Meeting of Shareholders (GMS) of 2029.

Other positions held by Gerard on 31 December 2025:

- Vice-Chair of the Supervisory Board of ASR and member of the Audit and Risk Committee and Nomination & ESG Committee
- Chair of the Stakeholders' Body for Professional Regulation of the Royal Dutch Professional Organisation of Accountants (*NBA*)
- Chair of the Supervisory Board of Robidus
- Chair of the Supervisory Board of Mollie B.V.

Jeanine Helthuis

1962 – Nationality: Dutch – Gender: Female

Jeanine Helthuis was appointed to the Supervisory Board on 20 September 2021, and reappointed on 17 April 2025. Jeanine is also Chair of the SNRC and a member of the Risk & Compliance Committee (R&CC) and ESG Committee. Her term of office will expire on the date of the GMS of 2029.

Other positions held by Jeanine on 31 December 2025:

- Member of the Supervisory Board of Transdev Nederland Holding N.V. / member of the Audit & Compliance Committee and Selection, Nomination and Remuneration Committee
- Member of the Supervisory Board of CAB Payments Europe

Petra van Hoeken

1961 – Nationality: Dutch – Gender: Female

Petra van Hoeken was appointed as a member of the Supervisory Board on 20 September 2021, and reappointed on 17 April 2025. Petra is also Chair of the R&CC and a member of the Audit Committee (AC) and ESG Committee. Her term of office will expire on the date of the GMS of 2029.

Other positions held by Petra on 31 December 2025:

- Non-executive board member of Nordea Bank / chair of the Board Risk Committee and member of the Board Audit Committee
- Advisor to the Ministry of Economic Affairs and Climate Policy / Chair of the Credit Committee of the Corporate Finance Guarantee Scheme
- Board member of the foundation managing RDS (Dutch Shell) employee share plans
- Member of the Supervisory Board of NSI N.V. and chair of the Audit Committee
- Board member of the Female Cancer Foundation

Aloys Kregting

1967 – Nationality: Dutch – Gender: Male

Aloys Kregting was appointed as a member of the Supervisory Board on 24 August 2018 and was reappointed on 21 April 2022. His term of office will expire on the date of the GMS of 2026. Aloys is also member of the AC, SNRC and ESG Committee.

Other positions held by Aloys on 31 December 2025:

- Head of Global Enabling Services, ASML

Jos van Lange

1956 – Nationality: Dutch – Gender: Male

Jos van Lange was appointed as a member of the Supervisory Board on 1 May 2018 and was reappointed on 21 April 2022. On 31 October 2022 Jos was appointed as Vice-Chair of the Supervisory Board. His term of office will expire on the date of the GMS of 2026. On 20 September 2021, Jos took the reins as Chair of the AC and remained a member of the R&CC and ESG Committee.

Other positions held by Jos on 31 December 2025:

- Vice-chair of the Supervisory Board and chair of the Audit, Risk & Compliance Committee of Bouwinvest N.V.
- Member of the Investment Advisory Committee of DELA
- Chair of the Landgoed Kasteel Geldrop Foundation

Flows of risk management information to Executive Board and Supervisory Board

Table of reports and frequencies			
	Report	Executive Board	Supervisory Board
1st line	Quarterly Business Review/Management reports	quarterly	quarterly
	Monthly Business Review	monthly	n.a.
	In Control Statement	annually	annually
	ICAAP/ILAAP package	annually	annually
	Recovery Plan	annually	annually
2nd line	Quarterly Risk Report	quarterly	quarterly
	ICAAP/ILAAP opinion	annually	annually
	Risk Appetite Statement	annually	annually
	Strategic Risk Assessment	annually	annually
	Self-assessment risk committees	annually	annually
	Recovery Indicator Dashboard	semi annually	n.a.
	Risk Management Function (RMF) Charter	annually	annually
	Review Compliance Function Charter	annually	annually
	Review self-assessment Integrated Control Framework	annually	annually
	3rd line	Audit report external accountant	semi annually
Internal audit report		quarterly	quarterly
Joint EY Audit ASN Bank Management Letter		annually	annually
Joint EY Audit ASN Bank Management Letter Progress Updates		quarterly	three times a year
Audit report capital management/Audit report ILAAP		annually	annually

The Executive Board and Supervisory Board of ASN Bank are regularly informed about risks and risk management. The table above indicates important reports that they receive, as well as their frequency.

During 2025, the Supervisory Board (SB) held five regular meetings according to the pre-set schedule and six additional meetings. These additional meetings were required to closely monitor and discuss ASN Bank’s key projects, including - but not limited to - the remediation plans for anti-financial crime and risk management and the new corporate strategy. Both the regular and additional meetings were attended by most of the members of the SB.

The Audit Committee (AC) held five regular meetings in 2025. At each meeting, the AC discussed the reports issued by the Audit department and received regular updates, either in writing or verbally from EY, the external auditor. Top risks related to both the internal control risks and financial risks were explicitly addressed. Also, the quarterly results were discussed in depth each quarter. The design, existence and operation of the internal control systems were also regularly on the agenda, with the AC paying

specific attention to the improvement programmes that were put in place to strengthen internal control and to make the reporting processes more robust.

The Risk & Compliance Committee (R&CC) held six regular meetings and one joint meeting with the SNRC in 2025. In every regular meeting, the R&CC reflected on the financial, non-financial and strategic risks subsequent to discussing the risk context and the risk management function.

The Selection, Nomination & Remuneration Committee (SNRC) meets at least once a year with the R&CC in a joint meeting to discuss people risk and how remuneration outcomes reflect risk. The SNRC held six regular meetings in 2025, and one joint meeting with the R&CC.

The Environmental, Social and Governance (ESG) Committee held five regular meetings in 2025. Specific topics discussed in the ESG Committee in 2025 included:

- Sustainability strategy
- Transition to Net zero
- Quaterly Integrated Sustainability Risk Reports
- Double Materiality Assessment (DMA)
- CSRD oversight and regulations
- Application with ESG laws and regulations

We also refer to the report of the Supervisory Board included in the Annual Report 2025, which includes a detailed list of the subjects and reports discussed by the Supervisory Board members in 2025. The reports received by the Supervisory Board members were also discussed by the Executive Board.

Please refer to the Section Leadership and Governance of the Annual Report 2025 of ASN Bank for information about the governance arrangements.

4. Own funds

4.1 Capital Management and control

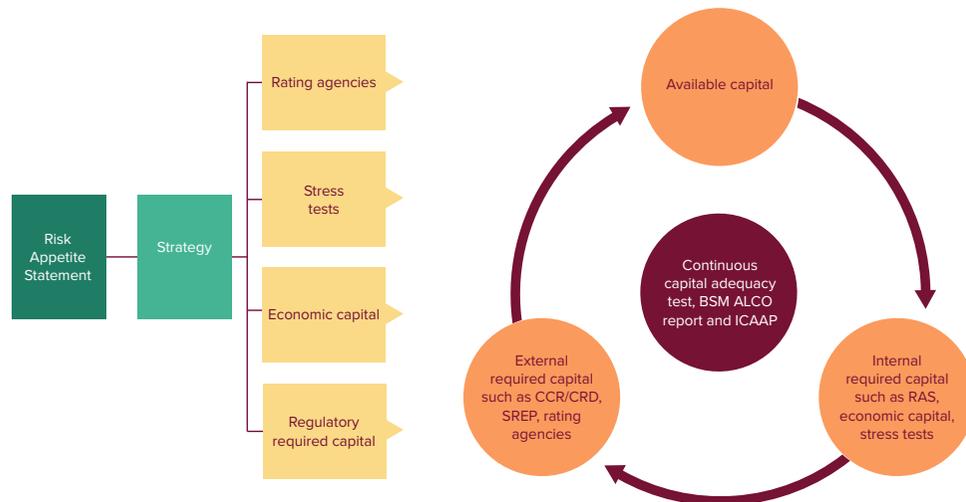
Capital management strategy

Our capital strategy incorporates the objective of having a solid capital position at our disposal to support ASN Bank’s corporate strategy, combined with an adequate Return on Equity (RoE). As for the RoE, ASN Bank applies a (long-term) target in the range of 8-10%. The basic principle for the capital amount held is that the bank maintains buffers in addition to the minimum amount of capital required by the supervisory authority to guarantee sufficient capitalisation in the event of a severe yet plausible stress scenario.

Regulatory capital and MREL

The minimum amount of capital required by law, i.e. regulatory capital, is based on risk-weighted capital ratios (CET1 capital, Tier 1 capital, total capital) and the required non-risk-weighted capital ratio, i.e. the leverage ratio. The minimum capital ratios are based on the SREP. In addition to these required capital ratios, ASN Bank is subject to the Minimum Requirement for Own Funds and Eligible Liabilities (MREL) on both a risk-weighted and non-risk-weighted basis.

ASN Bank manages its capital from several perspectives, as is shown in the figure.



Economic capital

ASN Bank also makes its own internal (economic) estimate of the amount of capital required. This differs from regulatory capital in two significant respects, namely:

1. We include in our calculations of economic capital risks from which material losses may ensue within a one-year horizon according to internal insights. This means that we consider more types of risk than in regulatory capital calculations.
2. We use our own insights to translate our risk appetite into (expected) internal capital requirements going forward.

We share the economic capital requirements with the supervisory authority. This is part of the Internal Capital Adequacy Assessment Process (ICAAP). We also use the economic capital requirements to determine our internal capital targets and thresholds for specific types of risk, as applied in the Risk Appetite Statement (RAS).

Stress testing

Every year, ASN Bank performs several stress tests to test the robustness of capital adequacy and examine other financial aspects, such as in the areas of liquidity and profitability. Stress tests may either be initiated internally or requested by supervisory authorities.

The scenarios to be calculated are drafted on the basis of a detailed risk identification that considers both systemic risks and idiosyncratic risks, i.e. financial system-related risks and ASN Bank-specific risks. In addition to scenario analyses, used to calculate the impact of, for example, a macroeconomic scenario on ASN Bank’s capital position, we also perform sensitivity analyses and reverse stress tests. The latter starts from a pre-determined outcome, such as a situation in which the bank is unable to meet its minimum capital requirements, and then looks at events that could lead to such a situation.

For the scenarios for which the impact is calculated by means of a stress test, we estimate the development of unemployment, economic growth, the interest rate and other factors. In these stress tests, the macroeconomic variables adversely impact aspects such as the net interest margin, the creditworthiness of the outstanding loan portfolio and the fair value of the interest-bearing investment portfolio. This subsequently results in a deterioration of the bank’s capital position. The stress test results are not only used to analyse the bank’s sensitivity to various types of stress, but also as input to determine risk appetite-related thresholds and management buffers to set the internal capital ratio target levels. Finally, they are used as input for ASN Bank’s recovery plan.

Recovery plan and contingency planning

Contingency planning, i.e. the planning for unforeseen events, is part of the bank's recovery plan. This plan's key objective is to prepare ASN Bank for a crisis in a way that enables us to recover independently and safeguard the bank's continuity.

Contingency planning encompasses the drafting and implementation of an action plan that allows us to take prompt measures as soon as our capital position deteriorates as anticipated or unexpectedly, for example as a result of financial market conditions. In addition to capital aspects, we also monitor the situation with respect to potential liquidity problems, both of which are identified by frequently monitoring early warning indicators. Changes in these indicators may be a first sign of stress.

On top of early warning indicators, we have defined recovery indicators that may trigger activation of the recovery plan. Applying the recovery plan-based measures helps us reinforce the capital ratios and recover independently. The scope of these measures is wide and not only relates to capital and liquidity, but also to operations and communications. The nature and severity of the deteriorating conditions will determine the measures, for example capital strengthening options, lowering the risk-weighted assets or raising funding, whatever is appropriate.

Besides a description of the available measures and conditions to be met before any measures are implemented, the recovery plan also contains an analysis of the expected recovery capacity. The analysis is supported by several (severe) stress scenarios in which the effectiveness of these measures has been assessed, the so-called recoverability assessment.

Every year, the recovery plan is updated and discussed with the Joint Supervisory Team (JST) of the ECB. At the latter's request, the recovery plan for 2025 included four scenarios that addressed system-wide macroeconomic and idiosyncratic stress. This analysis proved ASN Bank's capital and liquidity recoverability capacity to be adequate.

Rating agencies

The bank's creditworthiness is assessed by credit rating agencies S&P, Moody's and Fitch. To determine a credit rating, they look at aspects such as our capital position. To ensure that our capital ratios are in line with our credit rating ambition, we include the corresponding capital requirements in our capital planning.

Credit ratings

Credit ratings as at 31 December 2025

	Long-term rating	Short-term rating	Outlook
S&P	A	A-1	Negative
Moody's	A2	P-1	Stable
Fitch	A-	F1	Stable

In 2025, rating agencies S&P, Moody's and Fitch all reaffirmed ASN Bank's credit ratings. In March 2025, Moody's changed its outlook on our credit ratings to stable. The rating agencies' rating reports are available on our [website](#).

4.2 Own funds

Under the CRR3/CRD6 rules, ASN Bank's own funds comprise a number of components that must comply to certain conditions. ASN Bank's capital base consists of Common Equity Tier 1 capital (CET1), Additional Tier 1 capital (AT1) and Tier 2 capital (T2). These capital components in relation to the capital structure are explained below. We also address the ability of capital items to absorb losses and the restrictions applicable.

The template below lists the main features and conditions of the equity components of ASN Bank.

EU CCA - Main features of regulatory own funds instruments and eligible liabilities instruments

In € millions	a	b	c
	CET1 Capital	Additional Tier 1 Capital	Tier 2 Capital
1 Issuer	ASN Bank N.V.	ASN Bank N.V.	ASN Bank N.V.
2 Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	N/A	XS2454874285	XS2948048462
2a Public or private placement	Private	Public	Public
3 Governing law(s) of the instrument	Dutch law	Dutch law	Dutch law
3a Contractual recognition of write down and conversion powers of resolution authorities	N/A	Yes	Yes
Regulatory treatment			
4 Current treatment taking into account, where applicable, transitional CRR rules	Common Equity Tier 1	AT1	Tier 2
5 Post-transitional CRR rules	Common Equity Tier 1	AT1	Tier 2
6 Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated	Consolidated and solo	Consolidated and solo	Consolidated and solo

In € millions	a	b	c	
	CET1 Capital	Additional Tier 1 Capital	Tier 2 Capital	
7	Instrument type (types to be specified by each jurisdiction) Ordinary shares	Additional Tier 1 Regulation EU 575/2013 (as amended) art 52(f)	Tier 2 Regulation EU 575/2013 (as amended) art 63	
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	3,918	298	494
9	Nominal amount of instrument	381	300	500
EU-9a	Issue price	381	300	498
EU-9b	Redemption price	N/A	300	500
10	Accounting classification	Shareholders' equity	Shareholders' equity	Liability-amortised cost
11	Original date of issuance	N/A	15 June 2022	27 November 2024
12	Perpetual or dated	Perpetual	Dated	Dated
13	Original maturity date	No maturity	Perpetual	27 November 2035
14	Issuer call subject to prior supervisory approval	No	Yes	Yes
15	Optional call date, contingent call dates and redemption amount	N/A	15 June 2027 to (and including) 15 December 2027 (100% nominal amount), regulatory & tax call (prevailing principal amount)	27 November 2030 (100% nominal amount), regulatory & tax call (prevailing principal amount)
16	Subsequent call dates, if applicable	N/A	N/A	N/A
Coupons / dividends				
17	Fixed or floating dividend/coupon	Floating	Fixed	Fixed
18	Coupon rate and any related index	N/A	7.00%	4.125%
19	Existence of a dividend stopper	No	No	No
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Fully discretionary	Fully discretionary	Mandatory
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Fully discretionary	Fully discretionary	Mandatory
21	Existence of step up or other incentive to redeem	N/A	No	No
22	Non-cumulative or cumulative	Non-cumulative	Non-cumulative	Non-cumulative
23	Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible
30	Write-down features	N/A	N/A	N/A
34a	Type of subordination (only for eligible liabilities)	Statutory	Statutory	Statutory
EU-34b	Ranking of the instrument in normal insolvency proceedings	1	2	3
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Junior to AT1	Subordinated to Tier 2 Capital	Subordinated to senior unsecured funding
36	Non-compliant transitioned features	No	No	No
37	If yes, specify non-compliant features	N/A	N/A	N/A
37a	Link to the full term and conditions of the instrument (signposting)	N/A	https://corporate.asnbank.nl/investor-relations/debt-informatie/subordinated-and-capital-instruments/	https://corporate.asnbank.nl/investor-relations/debt-informatie/subordinated-and-capital-instruments/

On 5 August 2025 ASN Bank exercised the option to redeem its outstanding 1.75% Subordinated Tier 2 Notes issued on 22 July 2020 and maturing on 22 October 2030.

EU CC1 - Composition of regulatory own funds

in € millions	(a)	(b)	
	Amounts	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation ¹	
31-12-2025			
Common Equity Tier 1 (CET1) capital: instruments and reserves			
1	Capital instruments and the related share premium accounts	3,918	19, 20
	of which: Ordinary shares	381	19
	of which: Share premium	3,537	20
2	Retained earnings	-	24
3	Accumulated other comprehensive income (and other reserves)	-153	21, 22, 23
EU-5a	Independently reviewed interim profits net of any foreseeable charge or dividend	55	25
6	Common Equity Tier 1 (CET1) capital before regulatory adjustments	3,820	
Common Equity Tier 1 (CET1) capital: regulatory adjustments			
7	Additional value adjustments (negative amount)	-3	2, 3, 10
8	Intangible assets (net of related tax liability) (negative amount)	-5	6a
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)	-	7a, 16a
11	Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value	-11	2, 5, 10, 22
12	Negative amounts resulting from the calculation of expected loss amounts	-147	
27a	Other regulatory adjustments	-40	
28	Total regulatory adjustments to Common Equity Tier 1 (CET1)	-206	
29	Common Equity Tier 1 (CET1) capital	3,613	
Additional Tier 1 (AT1) capital: instruments			
30	Capital instruments and the related share premium accounts	298	
31	of which: classified as equity under applicable accounting standards	298	
36	Additional Tier 1 (AT1) capital before regulatory adjustments	298	
Additional Tier 1 (AT1) capital: regulatory adjustments			
43	Total regulatory adjustments to Additional Tier 1 (AT1) capital	-	
44	Additional Tier 1 (AT1) capital	298	26
45	Tier 1 capital (T1 = CET1 + AT1)	3,911	
Tier 2 (T2) capital: instruments			
46	Capital instruments and the related share premium accounts	494	14
51	Tier 2 (T2) capital before regulatory adjustments	494	
Tier 2 (T2) capital: regulatory adjustments			
57	Total regulatory adjustments to Tier 2 (T2) capital	-	
58	Tier 2 (T2) capital	494	
59	Total capital (TC = T1 + T2)	4,405	
60	Total Risk exposure amount	18,259	
Capital ratios and requirements including buffers			
61	Common Equity Tier 1 capital	19.79%	
62	Tier 1 capital	21.42%	
63	Total capital	24.13%	
64	Institution CET1 overall capital requirements	11.13%	
65	of which: capital conservation buffer requirement	2.50%	

		(a)	(b)
		Amounts	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation ¹
in € millions		31-12-2025	
66	of which: countercyclical capital buffer requirement		1.91%
67	of which: systemic risk buffer requirement		0.00%
EU-67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer requirement		0.25%
EU-67b	of which: additional own funds requirements to address the risks other than the risk of excessive leverage		1.97%
68	Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements		12.63%
Amounts below the thresholds for deduction (before risk weighting)			
72	Direct and indirect holdings of own funds and eligible liabilities of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)		13
75	Deferred tax assets arising from temporary differences (amount below 17.65% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met)		-
Applicable caps on the inclusion of provisions in Tier 2			
76	Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)		-
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach		63
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach		51

1. Column (b) in template EU CC1 is based on the reference numbers of the balance sheet under the regulatory scope of consolidation disclosed in template EU CC2.

Total equity according to the Capital Requirements Directive (CRD) is determined by deducting non-eligible interim profits and the amount of Additional Tier 1 capital of € 298 million from total equity.

In 2025, total equity rose by € 283 million to € 4,331 million due to the net profit of € 268 million and a € 36 million increase in the fair value reserve and cash flow hedge reserve, offset by the semi-annual payment of AT1 coupons of € 21 million. Available distributable items (equalling the sum of share premium, other reserves including retained earnings and net result for the period) amounted to € 3,682 million (year-end 2024: € 3,436 million).

Of the total profit of € 268 million, € 213 million is not eligible for inclusion in CET1 capital at the end of 2025. The non-eligible interim profits of € 139 million as at year-end 2024, were added to CET1 capital after profit appropriation by the General Meeting of Shareholders (GMS) in April 2025 as well as € 55 million interim profits of 2025 in Q3 2025.

CET1 capital is determined by subtracting multiple regulatory and other adjustments from total equity for CRD purposes. As at year-end 2025, these adjustments amounted to € 206 million negative (year-end 2024: € 169 million negative CRR 2), consisting mainly of a deduction of € 147 million related to the IRB shortfall (reported in row 12), and a deduction of € 40 million due to the Article 3 CRR deduction (reported in row 27-a).

The IRB shortfall is the result of our Advanced Internal Ratings Based (AIRB) model calculations. To determine the credit risk in our residential mortgage portfolio, ASN Bank avails itself of an AIRB model entitled Particuliere Hypotheken Interne Rating Model (PHIRM). This model is continuously redeveloped to comply with new rules and regulations.

As of 1 January 2025, following CRR 3, the substitution approach is applied for the credit risk calculation of NHG guaranteed mortgages. The application of the substitution approach results in a € 21 million reduction of expected losses because NHG-guaranteed mortgages are effectively reported as 0% risk-weighted SA exposures to central government. Pending adjustments to be made in IRB modelling regarding non-NHG mortgages, the overall impact on expected loss is neutralised by applying an Article 3 CRR CET1 deduction of an equal size.

On 21 July 2025, ASN Bank announced to call the outstanding € 0.5 billion Tier 2 capital instrument that was issued on 22 July 2020. This has already been anticipated in 2024 with the issuance of € 0.5 billion in a green Tier 2 capital instrument given favourable market circumstances at the time, combined with an uncertain outlook due to geopolitical unrest.

EU CC2 - Reconciliation of regulatory own funds to balance sheet in the audited financial statements

in € millions	a/b	c
	Balance sheet as in published financial statements / Under regulatory scope of consolidation ¹ 31-12-2025	Reference ²
Assets - Breakdown by asset classes according to the balance sheet in the published financial statements		
1 Cash and balances at central banks	1,178	
2 Derivatives	1,789	7, 11
3 Investments	6,809	7
4 Loans and advances to banks ³	7,323	
5 Loans and advances to customers	59,172	11, 50
6 Tangible and intangible assets	48	
6a of which: intangible assets	5	8
7 Tax assets	3	
7a of which: deferred tax assets	-	10
8 Other assets	342	
9 Total assets	76,664	
Liabilities - Breakdown by liability classes according to the balance sheet in the published financial statements		
10 Derivatives	509	7, 11
11 Amounts due to banks	1,117	
12 Amounts due to customers	57,811	
13 Debt certificates	11,873	
14 Subordinated debts	494	46
15 Provisions	263	
16 Tax liabilities	2	
16a of which: deferred tax liabilities	2	10
17 Other liabilities	264	
18 Total liabilities	72,333	
Shareholders' Equity		
19 Share capital	381	1
20 Share premium reserve	3,537	1
21 Accumulated other comprehensive income	-42	3
22 Fair value reserves related to gains on cash flow hedges	11	3, 11
23 Other reserves	-123	3
24 Retained earnings	-	2
25 Net result for the period	268	EUR-5a
26 AT1 capital securities	298	44
27 Shareholders' equity	4,331	

1. There is no difference between the regulatory scope of consolidation scope defined and the method for consolidation used for the balance sheet in the financial statements. Therefore column a and b are merged.

2. Column c in template EU CC2 includes the reference numbers of the regulatory own funds breakdown disclosed in template EU CC1.

3. Including balances held with the Central Bank required as minimum reserve

EU TLAC1 - Composition MREL 31-12-2025

		a
		Minimum requirement for own funds and eligible liabilities (MREL)
Own funds and eligible liabilities and adjustments		
1	Common Equity Tier 1 capital (CET1)	3,613
2	Additional Tier 1 capital (AT1)	298
6	Tier 2 capital (T2)	494
11	Own funds for the purpose of Articles 92a of Regulation (EU) No 575/2013 and 45 of Directive 2014/59/EU	4,405
Own funds and eligible liabilities: Non-regulatory capital elements		
12	Eligible liabilities instruments issued directly by the resolution entity that are subordinated to excluded liabilities (not grandfathered)	3,000
EU-12a	Eligible liabilities instruments issued by other entities within the resolution group that are subordinated to excluded liabilities (not grandfathered)	-
EU-12b	Eligible liabilities instruments that are subordinated to excluded liabilities issued prior to 27 June 2019 (subordinated grandfathered)	-
EU-12c	Tier 2 instruments with a residual maturity of at least one year to the extent they do not qualify as Tier 2 items	-
13	Tier 2 instruments with a residual maturity of at least one year to the extent they do not qualify as Tier 2 items	-
13	Eligible liabilities that are not subordinated to excluded liabilities (not grandfathered pre-cap)	-
EU-13a	Eligible liabilities that are not subordinated to excluded liabilities issued prior to 27 June 2019 (pre-cap)	43
14	Amount of non subordinated eligible liabilities instruments, where applicable after application of Article 72b (3) CRR	-
17	Eligible liabilities items before adjustments	3,043
EU-17a	Of which subordinated liabilities items	3,000
Own funds and eligible liabilities: Adjustments to non-regulatory capital elements		
18	Own funds and eligible liabilities items before adjustments	7,448
19	(Deduction of exposures between multiple point of entry (MPE) resolution groups)	
20	(Deduction of investments in other eligible liabilities instruments)	
22	Own funds and eligible liabilities after adjustments	7,448
EU-22a	Of which: own funds and subordinated liabilities	7,405
Risk-weighted exposure amount and leverage exposure measure of the resolution group		
23	Total risk exposure amount (TREA)	18,259
24	Total exposure measure (TEM)	76,810
Ratio of own funds and eligible liabilities		
25	Own funds and eligible liabilities as a percentage of TREA	40.79%
EU-25a	Of which own funds and subordinated liabilities	40.56%
26	Own funds and eligible liabilities as a percentage of TEM	9.70%
EU-26a	Of which own funds and subordinated liabilities	9.64%
27	CET1 (as a percentage of the TREA) available after meeting the resolution group's requirements	14.73%
28	Institution-specific combined buffer requirement	
29	of which capital conservation buffer requirement	
30	of which countercyclical buffer requirement	
31	of which systemic risk buffer requirement	
EU-31a	of which Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer	
Memorandum items		
EU-32	Total amount of excluded liabilities referred to in Article 72a(2) of Regulation (EU) No 575/2013	

Total capital and eligible SNP liabilities fell by € 0.3 billion to € 7.4 billion. This was the result of € 0.5 billion of outstanding SNP debt no longer being MREL eligible and the call of an outstanding green Tier 2 capital instrument of € 0.5 billion, partly compensated by a € 171 million increase in CET1 capital and the issuance of € 0.5 billion in green SNP debt.

ASN Bank is not a Globally Systemically Important Institution (G-SII). As Resolution Group MREL (and not TLAC) is applicable. Therefore, columns b to c of table EU TLAC1 are not applicable.

EU TLAC3b - Creditor ranking Resolution entities 31-12-2025

	Insolvency ranking												Total
	1 (most junior)	2	3	4	5	6	7	8	9	10	11	12 (most senior)	
1 Description of insolvency rank (free text)	Common equity Tier 1 instruments	Additional Tier 1 instruments	Tier 2 capital instruments	No longer qualifying AT1 or T2 unless agreed (contractually) otherwise	Other subordinated debt	Senior non-preferred "Tier 3" debt instruments	Other liabilities	Preferred deposits retail + SME	Covered deposits - Claims of a DGS following its subrogation in the rights and obligations of covered depositors	Employee Liabilities that have a preferential status by law.	Dutch Tax and social security authority Claims that have a preferential status by law.	Secured creditors (collateralised part)	
5 Own funds and liabilities potentially eligible for meeting MREL	3,613	298	492	-	2	3,000	43	-	-	-	-	-	7,448
6 of which residual maturity ≥ 1 year < 2 years	-	-	-	-	-	1,000	20	-	-	-	-	-	1,020
7 of which residual maturity ≥ 2 year < 5 years	-	-	-	-	-	1,500	21	-	-	-	-	-	1,521
8 of which residual maturity ≥ 5 years < 10 years	-	-	492	-	-	500	1	-	-	-	-	-	993
9 of which residual maturity ≥ 10 years, but excluding perpetual securities	-	-	-	-	-	-	2	-	-	-	-	-	2
10 of which perpetual securities	3,613	298	-	-	-	-	-	-	-	-	-	-	3,911

The accrued interest in Tier 2 capital instruments is reclassified from insolvency ranking 3 to 5 with a maturity date of less than one year.

ASN Bank is not a Globally Systemically Important Institution (G-SII), so only TLAC template TLAC3b is applicable for ASN Bank.

4.3 Macroprudential supervisory measures

Capital requirements

Implementation CRR 3

First-time adoption effect

As of 1 January 2025, we report our regulatory capital metrics and risk exposures in line with Capital Requirements Regulation 3 (CRR 3) instead of CRR 2, with a first-time adoption effect of + 0.2 percentage points on ASN Bank's Common Equity Tier 1 (CET1).

The increase of the CET1 ratio of 0.2% mainly follows from a € 0.4 billion decrease in ASN Bank's Internal Ratings Based (IRB) risk-weighted assets (RWA), a € 0.1 billion decrease in RWA for credit risk calculated according to the Standardised Approach (SA) and a € 7 million increase in CET1 capital, largely offset by a € 0.4 billion increase in RWA for operational risk.

The downward impact of CRR 3 on IRB-based RWA is due to the removal of a 1.06 scaling factor to determine residential mortgage-related RWA and the adjustment of the credit conversion factor for off-balance sheet items under the revised IRB approach. These effects were to a large extent offset by applying a 18% floor for the calculated residential mortgage-related IRB-based risk weight to include additional conservatism in agreement with prudential requirements. The upside impact of CRR 3 on RWA for operational risk is due to a changed methodology that also takes into account the administrative fines and provision for AFC remediation in 2024.

NHG substitution approach

Under CRR 3, ASN Bank applies the substitution approach for the credit risk calculation of NHG-guaranteed mortgages. At year-end 2025, the application of the substitution approach results in a € 21 million reduction of expected losses and a € 1.9 billion reduction of the reported IRB RWA for credit risk because NHG-guaranteed mortgages are effectively reported as 0% risk-weighted SA exposures to central government. Pending further refinements to be made in IRB modelling regarding non-NHG mortgages, currently the overall impact is neutralised by applying an Article 3 CRR CET1 capital deduction and an Article 3 CRR RWA add-on of equal size.

Internal minimum level

ASN Bank sets its target for the leverage ratio at a level of at least 4.5% and for the CET1 ratio target at a level of at least 17.0%. Our leverage ratio target of at least 4.5% is in line with the leverage ratio of comparable European banks and includes an ample management buffer to withstand severe stress situations.

The CET1 ratio target of at least 17% includes an ample management buffer - above the current CET1 OCR of 11.1% - to withstand severe stress scenarios and to provide flexibility to absorb potentially higher capital requirements.

Capital expected to sustainably exceed our minimum targets is available for distribution, subject to regulatory approval.

DNB minimum floor for risk weighting of mortgage loans

From 1 January 2022, DNB applies a minimum risk weighting for mortgage portfolios of Dutch banks, with the exception of mortgages with (partial) National Mortgage Guarantee (NHG) coverage, to banks that use internal risk models to calculate capital requirements for their mortgage portfolios, such as ASN Bank. In 2024 the regulation was extended until 30 November 2026. As at year-end 2025, this measure had no impact on ASN Bank, given the bank's RWA level for residential mortgages.

Provision for non-performing exposures

ASN Bank deducts any insufficient coverage for non-performing exposures (NPEs) under the CRR statutory backstop from its CET1 capital. As at year-end 2025 this CET1 capital deduction amounted to € 4 million. The prudential provisions for outstanding NPEs according to the ECB expectations and SREP recommendation resulted in an additional Article 3 CRR CET1 capital deduction of € 14 million at year-end 2025.

MREL

On 18 December 2025 the National Resolution Authority (NRA) updated the Minimum Requirement for Own Funds and Eligible Liabilities (MREL) requirements for ASN Bank with effect from 18 December 2025. The MREL requirement based on the non-risk weighted leverage ratio exposure (LRE) amounts to 7.91% and the MREL requirement based on RWA to 21.56%, excluding the Combined Buffer Requirement. Both the LRE and RWA MREL requirements are to be fully met with subordinated instruments, i.e. Tier 1 capital, Tier 2 capital and senior non-preferred (SNP) notes with a residual contractual maturity of at least 1 year. The non-risk-weighted MREL requirements are more restrictive for ASN Bank than the risk-weighted MREL requirements.

In 2025, ASN Bank successfully executed a capital market funding transaction to strengthen its MREL position in anticipation of expected future redemptions:

- € 0.5 billion in green SNP debt with a 7-year maturity.

Including this instrument ASN Bank operates well above the MREL requirements.

EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical capital buffer 2025

In € millions	a	b	c	e	f	g	i	j	k	l	m
	General credit exposures		Relevant credit exposures – Market risk	Securitisation exposures Exposure value for Non-Trading Book	Total exposure value	Own fund requirements			Risk-weighted exposure amounts	Own fund requirements weights (%)	Countercyclical buffer rate (%)
	Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of Trading Book exposures for SA			Relevant credit risk exposures - Credit risk	Relevant credit exposures – Securitisation positions in the Non-Trading Book	Total			
010 Breakdown by country:											
The Netherlands	3,514	44,619	-	270	48,403	847	2	849	10,617	90.79%	2.00%
France	551	1	-	-	552	14	-	14	173	1.48%	1.00%
Belgium	274	31	-	-	305	15	-	15	186	1.59%	1.00%
Germany	384	4	-	-	388	13	-	13	157	1.34%	0.75%
Luxembourg	251	1	-	-	251	18	-	18	228	1.95%	0.50%
United Kingdom	362	2	-	-	364	15	-	15	189	1.62%	2.00%
Norway	174	0	-	-	174	1	-	1	17	0.15%	2.50%
Austria	113	0	-	-	113	1	-	1	14	0.12%	0.00%
Denmark	42	0	-	-	43	1	-	1	9	0.08%	2.50%
Spain	46	1	-	-	47	4	-	4	53	0.45%	0.50%
Italy	42	1	-	-	42	3	-	3	36	0.31%	0.00%
United States	1	1	-	-	2	0	-	0	1	0.01%	0.00%
Sweden	12	1	-	-	13	1	-	1	9	0.08%	2.00%
Finland	11	-	-	-	11	0	-	0	1	0.01%	0.00%
Other	1	7	-	-	7	0	-	0	3.22	0.02%	0.00%
020 Total	5,779	44,667	-	270	50,715	933	2	936	11,694	100.00%	

This table contains an overview of the credit exposures relevant for the calculation of the countercyclical capital buffer (CCyB) of countries having an exposure value larger than € 1 million. The institution specific CCyB rate for ASN Bank is mainly driven by the CCyB rate for exposures to Dutch counterparties.

Under CRR 3, ASN Bank applies the substitution approach for the credit risk calculation of NHG-guaranteed mortgages. As a result, IRB NHG-guaranteed mortgages are effectively reported as 0% risk-weighted Standardised Approach (SA) exposures to the central government. This results a € 12 billion lower exposure value under IRB. Central government exposures under the SA are not relevant for the calculation of the CCyB.

The purpose of the CCyB is to increase banks' resilience when cyclical risks build up, and to release the buffer as soon as these risks materialise.

The institution specific countercyclical buffer rate is mainly driven by the countercyclical capital buffer for exposures to Dutch counterparties. Each quarter The Dutch Central Bank (DNB) sets the level of the buffer for the Netherlands, which, in principle, may vary from 0% to 2.5%. DNB has the discretion to set the countercyclical capital buffer above 2.5%.

On 31 May 2023, DNB announced an increase of the CCyB to 2%. Banks with loans in the Netherlands must meet this requirement since 31 May 2024. In accordance with the applicable laws and regulations, DNB determines the level of the CCyB every quarter. The risk picture has not changed materially since the previous CCyB decision, so DNB sees no reason to adjust its previous decision as of June 2025.

EU CCyB2 - Amount of institution specific countercyclical capital buffer 2025

in € millions	a
1 Total risk exposure amount	18,259
2 Institution specific countercyclical capital buffer rate	1.91%
3 Institution specific countercyclical capital buffer requirement	348

5. Leverage ratio

5.1 Leverage ratio qualitative disclosure

The leverage ratio is the ratio between a bank's amount of Tier 1 capital and its total exposure measure. To prevent banks from building up excessive debts a minimum Pillar 1 requirement for the leverage ratio of 3.0% applies with effect from June 2021. As from 2022, the ECB also assesses the risk of excessive leverage among supervised banks. This has not resulted in an additional Pillar 2 leverage ratio requirement for ASN Bank.

To manage the risk of excessive leverage, leverage ratio control is part of our continuous capital planning process as explained in the Section [4.1 Capital Management and control](#). Wholesale funding that affects the leverage ratio denominator is only attracted when this is consistent with our liquidity management and funding strategy. For more information, please refer to the Section [6.2 Liquidity Coverage Ratio - Funding strategy](#)

5.2 Leverage ratio quantitative disclosure

The risk exposure that is used in calculating the leverage ratio differs from the value of the assets as included in the financial statements. The template below presents the reconciliation of accounting assets and the leverage ratio exposure.

EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio exposures 2025

in € millions	a Applicable amount 31-12-2025
1 Total assets as per published financial statements	76,664
6 Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	-
8 Adjustment for derivative financial instruments	-1,018
10 Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	1,433
11 (Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	-3
12 Other adjustments	-266
13 Total exposure measure	76,810

The leverage ratio exposure measure increased by € 3.4 billion to € 76.8 billion mainly due to an increase in total assets as per published financial statements.

The adjustment for derivative financial instruments relates to the difference between the accounting value of the derivatives recognised as assets and the leverage ratio exposure value as determined by the application of CRR. As the effects of master netting agreements are taken into account in the leverage ratio exposure value, this adjustment leads to a decrease in exposure.

Other adjustments includes the receivables for cash variation margin provided in derivative transactions (€ 62 million) and the asset amounts deducted in Tier 1 (€ 206 million) due to prudential filters, regulatory deductions, and additional deductions due to Article 3 CRR.

EU LR2 - LRCOM: Leverage ratio common disclosure 2025

in € millions		CRR leverage ratio exposures	
		a 31-12-2025	b 30-6-2025
On-balance sheet exposures (excluding derivatives and SFTs)			
1	On-balance sheet items (excluding derivatives, SFTs, but including collateral)	74,875	73,746
3	(Deductions of receivables assets for cash variation margin provided in derivatives transactions)	-62	-190
6	(Asset amounts deducted in determining Tier 1 capital)	-206	-172
7	Total on-balance sheet exposures (excluding derivatives and SFTs)	74,606	73,383
Derivative exposures			
8	Replacement cost associated with SA-CCR derivatives transactions (ie net of eligible cash variation margin)	17	23
9	Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	754	666
13	Total derivatives exposures	771	689
Other off-balance sheet exposures			
19	Off-balance sheet exposures at gross notional amount	3,586	3,315
20	(Adjustments for conversion to credit equivalent amounts)	-2,147	-1,988
21	(General provisions deducted in determining Tier 1 capital and specific provisions associated with off-balance sheet exposures)	-6	-6
22	Off-balance sheet exposures	1,433	1,322
Capital and total exposure measure			
23	Tier 1 capital	3,911	3,883
24	Total exposure measure	76,810	75,394
Leverage ratio			
25	Leverage ratio (%)	5.09%	5.15%
EU-25	Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	5.09%	5.15%
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) (%)	5.09%	5.15%
26	Regulatory minimum leverage ratio requirement (%)	3.00%	3.00%
EU-26a	Additional own funds requirements to address the risk of excessive leverage (%)	0.00%	0.00%
EU-26b	of which: to be made up of CET1 capital	0.00%	0.00%
27	Leverage ratio buffer requirement (%)	0.00%	0.00%
EU-27a	Overall leverage ratio requirement (%)	3.00%	3.00%
Choice on transitional arrangements and relevant exposures			
EU-27b	Choice on transitional arrangements for the definition of the capital measure	fully phased-in	fully phased-in

The leverage ratio remained at 5.09%, from 5.10% at year-end 2024, as the Tier 1 capital increases € 171 million and the leverage ratio exposure (LRE) grows € 3.4 billion to € 76.8 billion.

The 5.09% leverage ratio is well above the regulatory requirement of 3.0%, and above our target of at least 4.5%.

EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures) 2025

in € millions		a
		CRR leverage ratio exposures 31-12-2025
EU-1	Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	74,813
EU-2	Trading Book exposures	10
EU-3	Banking Book exposures, of which:	74,802
EU-4	Covered bonds	1,112
EU-5	Exposures treated as sovereigns	6,364
EU-6	Exposures to regional governments, MDB, international organisations and PSE, not treated as sovereigns	355
EU-7	Institutions	7,108
EU-8	Secured by mortgages of immovable properties	55,911
EU-9	Retail exposures	88
EU-10	Corporates	2,373
EU-11	Exposures in default	553
EU-12	Other exposures (eg equity, securitisations, and other non-credit obligation assets)	939

The increase in on-balance sheet exposure is mainly the result of an increase in retail exposures secured by immovable property (€ 4.5 billion). The decrease in exposures to sovereigns (€ 1.8 billion) due to a reduction in balances at central banks is largely explained by an increase in exposures to institutions (€ 1.0 billion) resulting from the increased investment of available liquidity to optimise the return on our liquidity position.

6. Liquidity requirements

As explained in subsection 'Management and control' of the risk disclosures 'Liquidity risk and funding strategy' in Annual Report 2025, the Liquidity Coverage Ratio (LCR) is one of the instruments that we use to manage liquidity risk. The regular liquidity management process is also described in the risk disclosures in Annual Report 2025.

6.1 Liquidity risk management

Liquidity risk is the risk that ASN Bank, under normal circumstances as well as in times of stress, has insufficient liquid assets available in the short, medium or long-term to meet its financial obligations without incurring unacceptable costs or losses. Liquidity risk also includes the situation in which the balance sheet structure develops in such a way that ASN Bank suffers excessive exposure to a disruption of its funding sources. Our liquidity management framework is designed to maintain an adequate liquidity and funding profile to support ASN Bank's strategy within our risk appetite.

Risk profile

ASN Bank has a strong liquidity position, enabling the bank to meet its financial obligations at all times. We manage our liquidity position such that we are able to absorb the consequences of bank-specific and market-wide stress factors, such as stress in the money and/or capital markets or a strong outflow of savings and current account balances.

To fund our liquidity needs, we seek to diversify our funding sources in accordance with our funding strategy.

Risk governance

ASN Bank's risk governance is based on the three lines model (see the Section [3.1 Institution risk management approach](#)).

In terms of liquidity risk management, Hub Balance Sheet Management (BSM) and Hub Financial Markets & Treasury (FMT) make up the first line. Their main liquidity management responsibilities are to manage our liquidity profile with maximum efficiency within the risk appetite determined, and to raise funding in the money and capital markets.

Financial Risk Management constitutes the second line. It sets frameworks and monitors whether these are complied with, provides advice and determines the liquidity adequacy.

The third line (the audit function) independently assesses the first and second lines' performance.

As the Executive Board has ultimate accountability for risk management within the risk management organisation, it therefore functions as an overarching Bank Risk Committee, which is supported by risk committees, with representatives from the first and second lines in each committee.

The Supervisory Board is charged with the supervision of the Executive Board and in that role is provided with advice by the Audit Committee, the Risk and Compliance Committee and the Selection, Nomination & Remuneration Committee.

Management and control liquidity risk

ASN Bank centrally manages its liquidity position, cash flows and liquidity risks. The risk management cycle as defined in the Section [3.1 Institution risk management approach](#) that we use to manage liquidity risk constitutes the Internal Liquidity Adequacy Assessment Process (ILAAP).

This process is performed to monitor ASN Bank's liquidity profile on a continuous basis and to ensure the timely awareness of developments that may require action. The objective of the ILAAP is to ensure that liquidity risk and control elements are adequately covered, and to evaluate how planned and expected developments could influence the adequacy of ASN Bank's liquidity profile. The risk management lifecycle applies to liquidity risk management in the following way:

1. Identification of liquidity risks: we continuously aim to identify all potential risks within the scope of liquidity management. For example, we perform an independent risk review of all relevant liquidity management-related proposals.
2. Assessment of liquidity risks: one element of the ILAAP is that we continuously assess the adequacy of our liquidity profile and liquidity risk management. We present the outcome of our assessment in the annual ILAAP Liquidity Adequacy Statement (LAS) report. We compare the current and expected risk profile with the risk limits we have established. We not only use our findings to make adjustments to the actual liquidity profile, risk appetite, policy or guidelines, but also to improve the risk management process. The assessment of liquidity risks within the liquidity risk management lifecycle also entails:
 - The recalibration of the liquidity management strategy. We draw up guidelines for a balance sheet structure with optimum efficiency from a liquidity risk perspective.
 - The definition of actions in the Capital and Liquidity Plan. We do this at least once a year, giving substance to the anticipated funding and liquidity needs ensuing from the Financial Plan & Budget, which has a multi-year horizon. To this

end, we make forecasts of relevant risk indicators compared with the internal thresholds and work out various scenarios.

- The updating of forecasts in the liquidity part of the monthly Balance Sheet Management (BSM) Asset and Liability Committee (ALCO) report. The forecasts are updated every month based on the most recent insights and reported to the ALCO. The BSM ALCO report is reviewed by the second line, with specific attention to the current risk profile versus the risk thresholds and a forward-looking assessment.
 - Regular stress testing to provide insight into the key vulnerabilities and to assess the resilience of the liquidity position to severe but plausible adverse (economic) conditions. The results are included in the BSM ALCO report.
 - Drawing up a recovery plan and contingency plan for adverse circumstances. These plans contain possible measures to strengthen ASN Bank's liquidity position. An annual update of the recovery plan contributes to ASN Bank's continuity. For more information, please refer to the Section [4.1 Capital management and control](#).
3. Risk response to liquidity risks: every year, we determine the Risk Appetite Statement (RAS) for liquidity risk in conjunction with ASN Bank's general risk appetite and strategic objectives. To monitor liquidity risk, we use specific risk indicators and we determine the level we feel comfortable with on the basis of the liquidity risk appetite.
 4. Monitoring of liquidity risks: we monitor specific indicators on a daily basis and monitor early warning indicators defined in the RAS for liquidity risk on a regular basis in the Treasury Committee. On top of this, the ALCO monitors the RAS indicators in the BSM ALCO report on a monthly basis.
 5. Residual risk: because of (unexpected) balance sheet or regulatory developments, we may not be able to identify or fully manage liquidity risks at all times. By carrying out the liquidity risk management lifecycle, we aim to identify any such risks and formulate a risk response.
 6. Reporting of liquidity risk indicators: we prepare regulatory and internal reports to measure, monitor and manage ASN Bank's liquidity profile on an ongoing basis.

Management instruments

Liquidity position

In order to be able to instantly absorb unexpected increases in its liquidity requirements when necessary, ASN Bank maintains a liquidity position, which includes the central bank reserves. In addition, the liquidity position comprises a liquidity portfolio with unencumbered (highly) liquid investments that are eligible as ECB collateral and are registered in the ECMS (Eurosystem Collateral Management System) collateral pool. Investments in our liquidity portfolio are required to meet our sustainability criteria.

Besides the central bank reserves, the liquidity position mainly consists of government (guaranteed) bonds and bonds of ASN Bank's own securitisations, known as Residential Mortgage-Backed Securities (RMBS), backed by mortgages issued by ASN Bank. We determine the liquidity value of bonds in the liquidity position on the basis of the fair value of the bonds after applying the percentage haircuts as determined by the ECB.

Liquidity stress testing

We test the robustness of the liquidity position by means of stress tests. To this end, we have defined various scenarios, of which the so-called combined severe stress test has the highest impact. In this scenario we take the following into account:

- a strong outflow of savings and current account balances;
- a lack of funding options in money and capital markets;
- a decline in the fair value of bonds in the liquidity position;
- additional collateral requirements in the event of a 3-notch downgrade in our credit rating;
- additional collateral requirements caused by margin requirements on derivatives;
- a possible liquidity outflow in the event that committed credit lines are drawn down.

The objective of ASN Bank's liquidity management is to survive this severe stress scenario for a certain period of time. The impact of this stress scenario on the liquidity position therefore serves as input to determine and monitor ASN Bank's risk capacity and risk appetite.

We perform the combined severe stress test every month and review the stress test scenarios every year.

Key liquidity ratios

The Liquidity Coverage Ratio (LCR) indicates whether we have adequate liquid assets to absorb a prescribed 30-day liquidity stress scenario. The Net Stable Funding Ratio (NSFR) serves to determine the extent to which longer-term assets are financed with more stable forms of funding. Both liquidity standards are subject to a 100% regulatory minimum.

In addition to the LCR and NSFR, we manage the Loan-to-Deposit (LTD) ratio and the degree of asset encumbrance. Whereas the liquidity position focuses on liquidity that is instantly available to function as counterbalancing capacity when necessary, we also manage liquidity with a short-term horizon through short-term loans and investments and money market funding. Apart from this, we monitor the liquidity that may potentially be generated from our assets. On this basis, we assess the extent to which we can absorb certain stress and extreme outflows of funds.

Liquidity position

In 2025, the liquidity position remained above ASN Bank's own minimum target and regulatory minimum requirements. We consider the size and composition of our liquidity position sufficiently robust, and in managing the liquidity position we have prudently considered any possible impact from the strategic transformation.

Liquidity position		
in € millions	2025	2024
Central bank reserves	1,677	3,281
Sovereigns	1,389	1,378
Regional/local governments and Supranationals	2,109	2,118
Eligible retained RMBS	4,932	4,549
Other liquid assets	2,412	2,029
Liquidity position	12,519	13,355

This template provides an overview of the instantly available liquidity position from an internal perspective which differs from the regulatory perspective for the liquidity buffer as laid down in Annex I of EU Regulation 2015/61. The liquidity position includes amongst others ECB-eligible retained RMBS that are registered in the ECMS collateral pool, and which could be pledged to obtain central bank funding, thereby serving as additional counterbalancing capacity when necessary. As a result, the liquidity position differs from the liquidity buffer used in the LCR disclosure template.

The liquidity position amounted to € 12.5 billion at year-end 2025 (2024: € 13.4 billion).

In 2025, cash outflows exceeded cash inflows driven by growth of the residential mortgage portfolio. Central bank reserves decreased from € 3.3 billion at year-end 2024 to € 1.7 billion. The reduction was partly offset by attracting more money market funding. At the same time the available liquidity being invested for cash management purposes increased to € 8.2 billion at year-end 2025 (2024: € 7.4 billion). Of this amount, € 3.8 billion was held at Swiss cantonal banks (2024: € 3.7 billion). Attracted money market funding amounted to € 3.2 billion at year-end 2025 (2024: € 1.5 billion), mainly due to a higher amount of Commercial Paper.

The liquidity value of bonds in the ECMS collateral pool increased to € 10.8 billion at year-end 2025 (2024: € 10.1 billion). This increase mainly resulted from a lower ECB-haircut for our eligible retained RMBS and from registering a higher amount of ECB-eligible collateral in the ECMS collateral pool at year-end 2025.

6.2 Liquidity Coverage Ratio

EU LIQ1 - Quantitative information of LCR

Consolidated in € millions		a	b	c	d	e	f	g	h
		Total unweighted value (average)				Total weighted value (average)			
EU-1a	Quarter ending on	31-12-2025	30-9-2025	30-6-2025	31-3-2025	31-12-2025	30-9-2025	30-6-2025	31-3-2025
EU-1b	Number of data points used in the calculation of averages	12	12	12	12	12	12	12	12
HIGH-QUALITY LIQUID ASSETS									
1	Total high-quality liquid assets (HQLA)					6,772	7,373	7,765	8,077
CASH - OUTFLOWS									
2	Retail deposits and deposits from small business customers, of which:	52,493	52,853	53,182	53,098	2,867	2,881	2,894	2,879
3	<i>Stable deposits</i>	46,870	47,077	47,254	47,106	2,343	2,354	2,363	2,355
4	<i>Less stable deposits</i>	4,771	4,772	4,781	4,711	524	527	531	523
5	Unsecured wholesale funding	3,391	2,725	2,243	1,970	1,591	1,395	1,381	1,266
6	<i>Operational deposits (all counterparties) and deposits in networks of cooperative banks</i>	-	-	-	-	-	-	-	-
7	<i>Non-operational deposits (all counterparties)</i>	2,649	2,078	1,496	1,308	849	749	634	604
8	<i>Unsecured debt</i>	742	646	747	662	742	646	747	662
9	Secured wholesale funding					12	12	9	9
10	Additional requirements	2,024	1,996	1,919	1,859	1,077	1,087	1,082	1,117
11	<i>Outflows related to derivative exposures and other collateral requirements</i>	1,002	1,011	1,007	1,045	1,002	1,011	1,007	1,045
12	<i>Outflows related to loss of funding on debt products</i>	-	-	-	-	-	-	-	-
13	<i>Credit and liquidity facilities</i>	1,023	985	912	814	75	76	75	71
14	Other contractual funding obligations	791	680	524	476	730	620	463	414
15	Other contingent funding obligations	1,893	1,914	1,952	1,971	468	544	614	644
16	Total cash outflows					6,746	6,540	6,442	6,330
CASH - INFLOWS									
17	Secured lending (e.g. reverse repos)	-	-	-	-	-	-	-	-
18	Inflows from fully performing exposures	2,179	1,753	1,585	1,517	2,047	1,627	1,448	1,383
19	Other cash inflows	285	253	186	160	285	253	186	160
EU-19a	(Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies)							-	-
EU-19b	(Excess inflows from a related specialised credit institution)							-	-
20	Total cash inflows	2,464	2,006	1,771	1,677	2,332	1,880	1,633	1,543
EU-20a	<i>Fully exempt inflows</i>	-	-	-	-	-	-	-	-
EU-20b	<i>Inflows subject to 90% cap</i>	-	-	-	-	-	-	-	-
EU-20c	<i>Inflows subject to 75% cap</i>	2,464	2,006	1,771	1,677	2,332	1,880	1,633	1,543
TOTAL ADJUSTED VALUE									
EU-21	Liquidity buffer					6,772	7,373	7,765	8,077
22	Total net cash outflows					4,414	4,659	4,809	4,787
23	Liquidity coverage ratio¹					155.94%	159.65%	162.85%	169.85%

1. The figures in this template are calculated using the reported supervisory values and figures for each of the four calendar quarters (January-March, April-June, July-September, October-December) preceding the disclosure date. The values and figures in the template are calculated as the simple averages of month-end observations over the twelve months preceding the end of each quarter. Following this approach, the LCR cannot be calculated using the figures in the template.

The Liquidity Coverage Ratio (LCR) remained above the regulatory minimum of 100%. At year-end 2025, the LCR stood at 194% (2024: 191%). The Loan-to-Deposit ratio, i.e. the ratio between the loans outstanding to and deposits attracted from retail and SME customers, increased to 104% at year-end 2025, from 99% at year-end 2024. This increase was driven by € 4.5 billion loan growth accompanied by a € 1.6 billion increase in deposits. While the LtD-increase lowered available liquidity, the downward impact on the LCR was offset by attracting more money market funding longer than 30 days and by the increased investment of available liquidity with several counterparties in the money market within the 30-day LCR window to manage our liquidity position.

Fundamental changes in the LCR are mainly driven by net cash flows resulting from loan growth, deposit changes, capital market funding developments and the net cash collateral position related to derivative positions. However, the resulting net cash impact is not necessarily reflected in actual withdrawable central bank reserves as part of high-quality liquid assets, because ASN Bank invests part of its available liquidity with several counterparties in the money market and also attracts money market funding. These cash management choices affect the liquidity included in the scope of the 30-day LCR window via both high-quality liquid assets and cash inflows and outflows.

Qualitative information on LCR

In line with the EBA guidelines on LCR disclosure, information is provided below on:

- Funding strategy;
- Counterparty risk on derivative positions;
- Currency risk;
- A description of the degree of centralisation of liquidity management.

Funding strategy

ASN Bank's funding strategy supports its overall strategy.

Retail savings are ASN Bank's main source of funding. We attract funding by providing demand deposits, term deposits and current accounts to retail customers. We also

attract funding by providing savings and current accounts to SME customers. In 2025, retail deposits increased to € 57.3 billion, from € 55.7 billion at year-end 2024.

The objective of our funding strategy is to optimise the bank's liquidity and funding profile and to ensure access to diversified funding sources to maintain the bank's short-term and long-term funding position.

Therefore, in addition to attracting customer deposits, we also attract long-term funding from capital markets. For regulatory purposes and funding diversification, this funding is attracted through various instruments with different terms and investor types spread over regions.

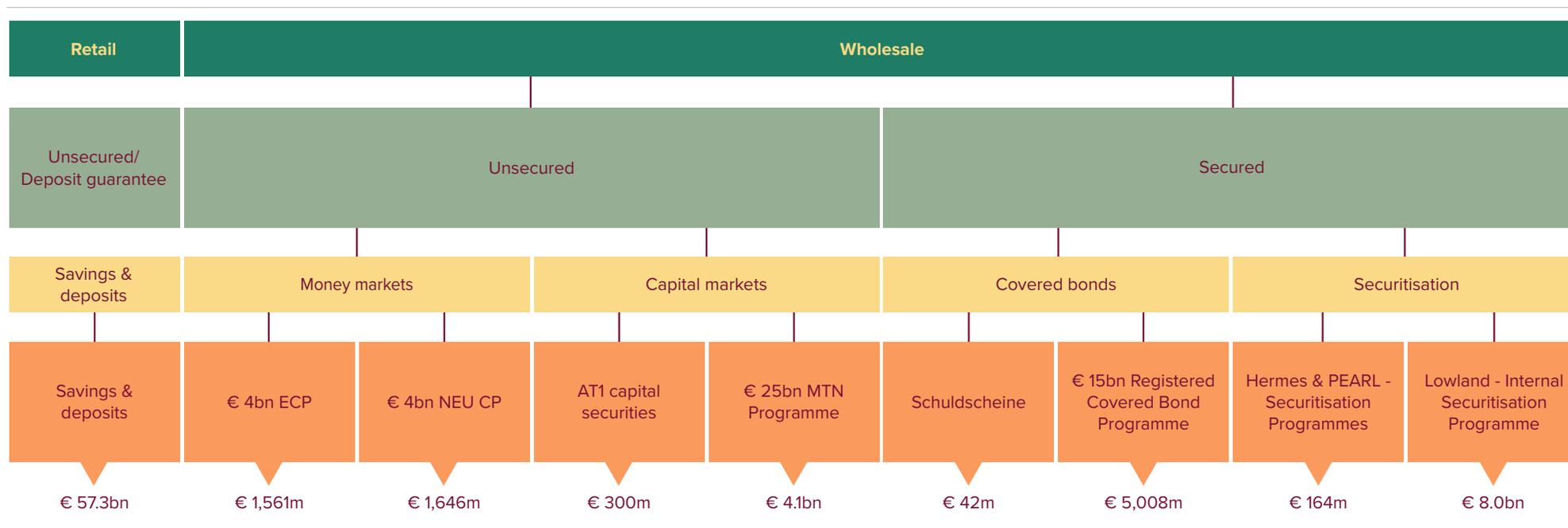
In addition to (subordinated) capital market funding to strengthen the bank's capital and MREL position, ASN Bank can issue capital market funding with maturities over one year through:

- senior (unsubordinated) unsecured debt;
- (mortgage) securitisations (RMBS);
- covered bonds.

The covered bond programme not only permits the issue of public covered bonds but also of private placements.

We issue short-term funding with a term of up to one year in the money markets via our Euro Commercial Paper (ECP) and Negotiable European Commercial Paper (NEUCP) programmes.

The overview below presents the various public funding programmes, including maximum amounts and outstanding nominal value available to ASN Bank at year-end 2025. The overview also includes other important funding sources.



Outstanding amounts as at year-end 2025

Counterparty risk on derivative positions

ASN Bank enters into money and capital market transactions with various financial institutions. This also includes derivative transactions for the hedging of interest rate and currency risks. Here, the bank runs the risk that the counterparty to a transaction defaults before the final settlement of the cash flows associated with the transaction has taken place. In line with common market practices, ASN Bank has several risk mitigating mechanisms in place, such as netting, margining and guarantees. ASN Bank clears derivative transactions as much as possible via central clearing counterparties to mitigate counterparty credit risk. See the Section [8 Counterparty credit risk](#) for more details.

Currency risk

The currency risk is minimised by effecting most of our foreign currency exposures through the Trading Book, where currency risk is managed on a day-to-day basis. As a result, the currency mismatch in the LCR is virtually zero.

Degree of centralisation of liquidity management

ASN Bank has centrally managed mid and back offices and staff departments. In addition, ASN Bank has a central liquidity management function.

Potential collateral deposit

In the event of a 3-notch downgrade of the bank's credit rating, ASN Bank is required to deposit additional collateral totalling € 86 million with counterparties (2024: € 56 million). We include this potential collateral deposit as an outflow in the LCR and the combined severe liquidity stress test.

Management statement

The management statement on the adequacy of risk management for liquidity is included in the overall statement in the Section [1.2 Key figures and Management statement](#).

6.3 Encumbered and unencumbered assets

The level of asset encumbrance provides insight into the amount of assets that have been pledged or are subject to any form of arrangement to secure, collateralise or credit enhance any transaction from which they cannot be freely withdrawn.

There is no difference between the regulatory consolidation scope used for the purpose of the disclosures on all asset encumbrance information and the accounting scope of consolidation. For more information reference is made to the Section [1.3 Scope of application](#).

Importance of asset encumbrance

ASN Bank's main sources of funding are savings deposits and current account balances. In addition, we attract funding from the capital market through various funding instruments, as explained in more detail in the Section [6.2 Liquidity Coverage Ratio - Funding strategy](#). These funding instruments include secured debt instruments such as covered bonds and securitisations. We have encumbered a limited part of our loan portfolio in these secured transactions. Other sources that contribute to asset encumbrance are the margining of derivative exposures to manage interest rate risk, a savings-based mortgage arrangement with Athora Netherlands.

Total encumbered assets

Based on the median of the four quarters, € 8.6 billion of the assets was encumbered during 2025. At year-end 2025, € 8.1 billion of the assets was encumbered (2024: € 8.7 billion), mainly on account of:

- outstanding covered bonds;
- collateral deposited in connection with derivative transactions;
- a savings-based mortgage arrangement with Athora Netherlands;
- outstanding securitisations;
- foreign exchange transactions;
- payment transactions.

The decrease in 2025 was primarily due to the cash reserve requirement no longer being reported as encumbered based on an updated interpretation of an EBA Q&A. At year-end 2025, the bank had € 6.8 billion (2024: € 7.5 billion) in liabilities secured by the encumbered assets.

Unencumbered assets

The unencumbered part of the assets amounted to € 68.6 billion at year-end 2025 and may partly be converted into cash, for example through a securitisation. Securitised mortgages of which the bank itself holds the bonds are considered to be unencumbered, except if these bonds are used as collateral, for instance in a repurchase transaction.

EU AE1 - Encumbered and unencumbered assets 2025¹

in € millions	Carrying amount of encumbered assets		Fair value of encumbered assets		Carrying amount of unencumbered assets		Fair value of unencumbered assets	
	010	of which notionally eligible EHQLA and HQLA 030	040	of which notionally eligible EHQLA and HQLA 050	060	of which EHQLA and HQLA 080	090	of which EHQLA and HQLA 100
010 Assets of the disclosing institution	8,565	590			66,147	5,305		
030 Equity instruments	-	-	-	-	13	-	13	-
040 Debt securities	618	590	607	578	6,843	5,285	6,822	5,265
050 of which: covered bonds	-	-	-	-	1,179	1,179	1,174	1,174
060 of which: securitisations	-	-	-	-	261	261	261	261
070 of which: issued by general governments	464	464	452	452	3,069	2,710	3,061	2,704
080 of which: issued by financial corporations	106	106	105	105	2,987	2,104	2,981	2,099
090 of which: issued by non-financial corporations	14	-	14	-	646	515	643	511
120 Other assets	7,960	-			58,927	9		

1. The figures are based on the median value of the four quarters in the financial year. This is in contrast to the figures in the text which are year-end figures.

Encumbered assets included in row 120 in template EU-AE1 (Other assets) mainly include loans to customers encumbered on account of our outstanding debt securities, savings premiums received in savings mortgage arrangement, and loans encumbered for foreign exchange and payment transactions. Furthermore, it includes cash collateral pledged to collateralise derivative transactions.

The asset encumbrance ratio at year-end 2025 amounts to 10.5% (2024: 11.8%).

The median of unencumbered own covered bonds and securitisations issued and not yet pledged decreased to € 7.2 billion in 2025 (2024: € 7.4 billion).

EU AE2 - Collateral received and own debt securities issued 2025¹

in € millions	Fair value of encumbered collateral received or own debt securities issued		Unencumbered	
	of which notionally eligible EHQLA and HQLA		Fair value of collateral received or own debt securities issued available for encumbrance	
	010	030	040	060
130 Collateral received by the disclosing institution	-	-	-	-
240 Own debt securities issued other than own covered bonds or securitisations	-	-	-	-
241 Own covered bonds and securitisations issued and not yet pledged			7,211	-
250 TOTAL ASSETS, COLLATERAL RECEIVED AND OWN DEBT SECURITIES ISSUED	8,565	590		

1. The figures are based on the median value of the four quarters in the financial year. This is in contrast to the figures in the text which are year-end figures.

EU AE3 - Sources of encumbrance 2025¹

in € millions	Matching liabilities, contingent liabilities or securities lent	Assets, collateral received and own debt securities issued other than covered bonds and securitisations encumbered
	010	030
010 Carrying amount of selected financial liabilities	7,027	7,615

1. The figures are based on the median value of the four quarters in the financial year. This is in contrast to the figures in the text which are year-end figures.

The median carrying amount of encumbered assets presented in table EU-AE3 are associated with derivative liabilities, collateralised deposits (including repurchase agreements) and debt securities issued. The matching liabilities decreased to € 7.0 billion in 2025 (2024: €7.2 billion). The € 0.2 billion decrease compared to year-end 2024 is mainly due to a decrease in derivative liabilities.

6.4 Net Stable Funding Ratio

EU LIQ2 - Net Stable Funding Ratio 31 December 2025

In € millions	a	b Unweighted value by residual maturity			e
	No maturity	< 6 months	6 months to < 1yr	≥ 1yr	Weighted value
Available stable funding (ASF) Items					
1 Capital items and instruments	4,116	-	-	494	4,610
2 <i>Own funds</i>	4,116	-	-	494	4,610
4 Retail deposits		51,346	48	603	49,189
5 <i>Stable deposits</i>		46,590	43	563	44,863
6 <i>Less stable deposits</i>		4,756	6	41	4,326
7 Wholesale funding:		8,094	737	8,023	10,183
9 <i>Other wholesale funding</i>		8,094	737	8,023	10,183
11 Other liabilities:	-	1,816	17	1,070	1,078
13 <i>All other liabilities and capital instruments not included in the above categories</i>		1,816	17	1,070	1,078
14 Total available stable funding (ASF)					65,060
Required stable funding (RSF) Items					
15 Total high-quality liquid assets (HQLA)					483
EU-15a Assets encumbered for a residual maturity of one year or more in a cover pool		38	40	4,845	4,184
17 Performing loans and securities:		7,570	2,088	52,758	39,466
19 <i>Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions</i>		5,426	1,189	420	1,557
20 <i>Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:</i>		1,562	380	3,293	3,900
21 <i>With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk</i>		829	331	1,176	1,530
22 <i>Performing residential mortgages, of which:</i>		473	491	48,551	33,505
23 <i>With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk</i>		412	427	42,059	28,094
24 <i>Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products</i>		110	28	494	504
26 Other assets:	-	983	73	1,267	1,501
28 <i>Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs</i>		197	70	406	572
29 <i>NSFR derivative assets</i>		5	0	-	5
30 <i>NSFR derivative liabilities before deduction of variation margin posted</i>		68	0	-	3
31 <i>All other assets not included in the above categories</i>		713	3	861	921
32 Off-balance sheet items		3,418	-	-	178
33 Total RSF					45,813
34 Net Stable Funding Ratio (%)					142.01%

The NSFR remained well above the regulatory minimum of 100%. The reduction in the NSFR is mainly explained by an increase in required stable funding due to the implementation of CRR 3 and an increase in our residential mortgage portfolio.

Retail savings are ASN Bank's main source of funding. We attract funding by providing demand deposits, term deposits and current accounts to retail customers. We also attract funding by providing savings and current accounts to SME customers. In 2025, retail deposits increased to € 57.3 billion, from € 55.7 billion at year-end 2024.

The objective of our funding strategy is to optimise the bank's liquidity and funding profile and to ensure access to diversified funding sources to maintain the bank's short-term and long-term funding position. Therefore, in addition to attracting customer deposits, we also attract long-term funding from capital markets. For regulatory purposes and funding diversification, this funding is attracted through various instruments with different terms and investor types spread over regions.

In 2025, ASN Bank successfully issued € 0.5 billion in green senior non-preferred debt with a 7-year maturity. As capital market funding redemptions in 2025 were limited to € 0.7 billion, capital market funding decreased from € 9.8 billion to € 9.6 billion. During 2025, ASN Bank has increased the issued amount of Commercial Paper to € 3.2 billion (2024: € 1.1 billion) to support the efficient use of this funding tool.

For more information on our funding strategy see paragraph Liquidity risk and funding strategy from the 2025 Annual Report.

Required stable funding mainly stems from our residential mortgage portfolio. Part of our mortgage portfolio is encumbered mainly on account of outstanding covered bonds. For more information see the Section [6.3 Encumbered and unencumbered assets](#).

In 2025, ASN Bank has reclassified the negative macro fair value hedge adjustments included in line 11 of template EU LIQ2 from a residual maturity of over one year to a residual maturity of less than six months. Furthermore, ASN Bank has included off-balance mortgages agreed but not yet drawn down in line 32. The figures from June 2025 and March 2025 have been revised in this Pillar 3 report compared to our interim Pillar 3 report to include these changes.

ASN Bank has no interdependent assets and liabilities in accordance with Article 428f CRR.

EU LIQ2 - Net Stable Funding Ratio 30 June 2025

In € millions	a	b	c	d	e
	No maturity	Unweighted value by residual maturity			Weighted value
		< 6 months	6 months to < 1yr	≥ 1yr	
Available stable funding (ASF) Items					
1 Capital items and instruments	4,056	506	-	509	4,565
2 <i>Own funds</i>	4,056	506	-	509	4,565
4 Retail deposits		51,175	44	616	49,043
5 <i>Stable deposits</i>		46,571	39	575	44,854
6 <i>Less stable deposits</i>		4,604	5	41	4,189
7 Wholesale funding:		5,339	1,565	7,933	10,466
9 <i>Other wholesale funding</i>		5,339	1,565	7,933	10,466
11 Other liabilities:	-	1,449	23	1,104	1,116
13 <i>All other liabilities and capital instruments not included in the above categories</i>		1,449	23	1,104	1,116
14 Total available stable funding (ASF)					65,190
Required stable funding (RSF) Items					
15 Total high-quality liquid assets (HQLA)					507
EU-15a Assets encumbered for a residual maturity of one year or more in a cover pool		37	38	4,871	4,205
17 Performing loans and securities:		7,515	1,973	50,720	38,451
19 <i>Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions</i>		4,701	1,089	978	1,992
20 <i>Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:</i>		1,011	334	3,273	3,479
21 <i>With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk</i>		336	281	1,254	1,230
22 <i>Performing residential mortgages, of which:</i>		427	452	46,036	31,872
23 <i>With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk</i>		370	394	39,798	26,671
24 <i>Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products</i>		1,375	98	434	1,107
26 Other assets:	-	1,007	5	1,483	1,641
28 <i>Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs</i>		202	0	395	507
29 <i>NSFR derivative assets</i>		11	0	-	11
30 <i>NSFR derivative liabilities before deduction of variation margin posted</i>		194	0	-	10
31 <i>All other assets not included in the above categories</i>		601	5	1,088	1,113
32 Off-balance sheet items		3,095	-	-	160
33 Total RSF					44,964
34 Net Stable Funding Ratio (%)					144.98%

EU LIQ2 - Net Stable Funding Ratio 31 March 2025

In € millions	a	b	c	d	e
	No maturity	Unweighted value by residual maturity			Weighted value
		< 6 months	6 months to < 1yr	≥ 1yr	
Available stable funding (ASF) Items					
1 Capital items and instruments	4,047	503	-	500	4,547
2 <i>Own funds</i>	4,047	503	-	500	4,547
4 Retail deposits		52,249	47	1,215	50,648
5 <i>Stable deposits</i>		47,286	41	1,163	46,123
6 <i>Less stable deposits</i>		4,963	6	52	4,525
7 Wholesale funding:		2,641	1,057	8,434	9,517
9 <i>Other wholesale funding</i>		2,641	1,057	8,434	9,517
11 Other liabilities:	-	1,523	21	489	500
13 <i>All other liabilities and capital instruments not included in the above categories</i>		1,523	21	489	500
14 Total available stable funding (ASF)					65,212
Required stable funding (RSF) Items					
15 Total high-quality liquid assets (HQLA)					559
EU-15a Assets encumbered for a residual maturity of one year or more in a cover pool		36	37	4,874	4,205
17 Performing loans and securities:		4,156	1,968	49,788	37,064
19 <i>Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions</i>		2,735	1,381	1,194	2,157
20 <i>Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:</i>		966	107	2,273	2,476
21 <i>With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk</i>		401	55	1,212	1,099
22 <i>Performing residential mortgages, of which:</i>		450	463	45,923	32,077
23 <i>With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk</i>		356	369	38,578	25,894
24 <i>Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products</i>		6	18	399	353
26 Other assets:	-	1,041	4	1,552	1,760
28 <i>Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs</i>		251	-	380	536
29 <i>NSFR derivative assets</i>		5	-	-	5
30 <i>NSFR derivative liabilities before deduction of variation margin posted</i>		139	-	-	7
31 <i>All other assets not included in the above categories</i>		646	4	1,172	1,213
32 Off-balance sheet items		2,954	-	-	154
33 Total RSF					43,742
34 Net Stable Funding Ratio (%)					149.08%

7. Credit risk

7.1 Credit risk quality

7.1.1 General qualitative information regarding credit risk

ASN Bank is concentrated in residential mortgage loans in the Netherlands. The Dutch residential mortgage market is considered a low-risk segment. Other loan portfolios on the balance sheet, much smaller in size, are:

- Other retail loans: consumer loans including credit facilities and personal loans
- SME loans, largely consisting of mortgage-backed loans
- Other corporate and government loans, consisting of:
 - Sustainable finance loans
 - Private placement loans

We make a distinction between secured and unsecured loans. Secured loans are collateralised by a mortgage on residential or business property. Sometimes loans are reinforced by a guarantee, like the National Mortgage Guarantee (NHG) or a government guarantee. Unsecured loans are overdraft facilities and personal loans for retail customers.

Exposures on financial institutions, governments or large corporates are used for managing the Banking Book. ASN Bank has policies in place that address the magnitude of such exposures and the reliability of counterparties (e.g. external ratings), to avoid excessive losses if a counterparty can no longer meet its obligations.

ASN Bank has a comprehensive credit risk monitoring framework, allowing it to monitor, analyse and manage the credit risk in relation to the risk appetite.

We have developed a framework to actively monitor concentration risks within the portfolios. As part of credit risk management, we internally assess and monitor the credit standing of our customers i.e. borrowers or counterparties. In this process we estimate the probability of our customers being unable to meet their contractual payment obligations arising from the loan agreement, as such inability could result in a potential financial loss for the bank. Monitoring takes place throughout the distinct phases of the Credit Life Cycle.

We use specific criteria to allocate customers and loans to a particular portfolio. At portfolio level, we steer the risk by defining the desired credit quality of new and existing loans. We monitor the actual development of the credit quality and, if

necessary, take corrective measures if a deviation from the risk appetite is about to occur.

To ensure effective monitoring and the timely implementation of mitigating actions, ASN Bank draws up credit risk reports. The responsibility for credit risk reporting lies with the first and second lines, respectively the business unit and risk management. The first line monitors portfolio developments to keep the risk within the risk appetite. The second line develops credit risk reports, which provide comprehensive insight into the level of credit risk and give a timely and forward looking warning when the quality of the portfolio deteriorates.

The credit risk reports are periodically submitted to the Credit Committee, the ExBo and the Risk and Compliance Committee of the Supervisory Board.

ASN Bank prioritises customer trust for long-term relationships. When we have concerns regarding retail customer's ability to meet its obligations in accordance with the agreed terms, we contact them to assess solutions: we can offer financial coaching or potentially offer a solution that is within the commercial mandate. If this is not feasible, Collections & Recovery (C&R) steps in. This department manages customers with financial difficulties regarding mortgages, private loans, current accounts or SME loans. C&R can arrange a visit to discuss the customer's financial difficulties. Based on a customer assessment, a modification of the loan can be agreed upon (a forbearance measure) or C&R supports the customer to sell the collateral and foreclose the loan. ASN Bank avoids debt collection agencies and only engages the services of a bailiff if no long-term solution can be agreed upon.

For Other corporate and government loans, ASN Bank responds promptly when customers either notify us of expected financial difficulties or display signs of financial distress. Together with the customer and supported by external expertise, we explore the options to make the business financially resilient again. If necessary a forbearance measure, but if restructuring proves impossible, we support the customer in selling the collateral and unwinding the loan.

Risk profile

Over the past years the credit risk of ASN Bank's portfolios decreased due to the strong economic situation of the Netherlands. The unemployment rate is low, salaries increased, house prices increased, and the customer interest rates are favourable. As a result the number of customers in arrears or in default remains low. Portfolio developments are in line with ASN Bank's strategy to increase market share and fit well within the risk appetite of the bank.

Also throughout 2025, interest-only mortgages had our continued attention. We explored additional de-risking measures for interest-only mortgages in the Netherlands. ASN Bank implemented processes to gather information on customers' intention to repay their interest-only mortgage and the affordability of the mortgage at maturity, aligning with ECB guidance. These measures may result in further scrutiny of the future loan volume development, impairment charges and capital.

For Other corporate and government loans, ASN Bank faced a deteriorated financial situation of multiple Sustainable Finance loans. Besides the windmill parks and solar energy parks, ASN Bank also invested in several innovative projects for which the business cases appeared to be less sound than initially projected at origination. ASN Bank placed selected loans on the watchlist and holds higher individually determined provisions for these loans. In 2025, a non-performing loan with a significant exposure was unwound. ASN Bank will continue to closely and actively manage this portfolio from a risk perspective. ASN Bank held appropriate credit provisions for the problem loans during 2025.

The risk profiles for SME loans, Other retail loans and Private placement loans did not significantly change throughout 2025. The portfolio volumes grew only slightly in 2025, the loan sizes are small, and these portfolios are both in absolute and relative terms less material on ASN Bank's balance sheet.

7.1.1.1 Provisioning methodology

Loan loss provisions (IFRS 9)

Based on IFRS 9 Expected Credit Loss (ECL) models, we estimate the risk of our customers running into financial difficulties on a monthly basis. Details of how loan loss provisions are determined are set out in this section.

Under IFRS 9, ASN Bank creates a provision for expected credit losses for each customer with a loan or credit facility. This provision also includes expected losses on loan commitments and financial guarantee contracts, known as 'off-balance sheet commitments'.

ECL models and loan portfolios

At ASN Bank, we distinguish the following specific loan portfolios for which we determine loan loss provisions:

- Residential mortgages;
- Consumer loans;
- SME loans;
- Sustainable finance loans and private placement loans (included in Other commercial and government loans);

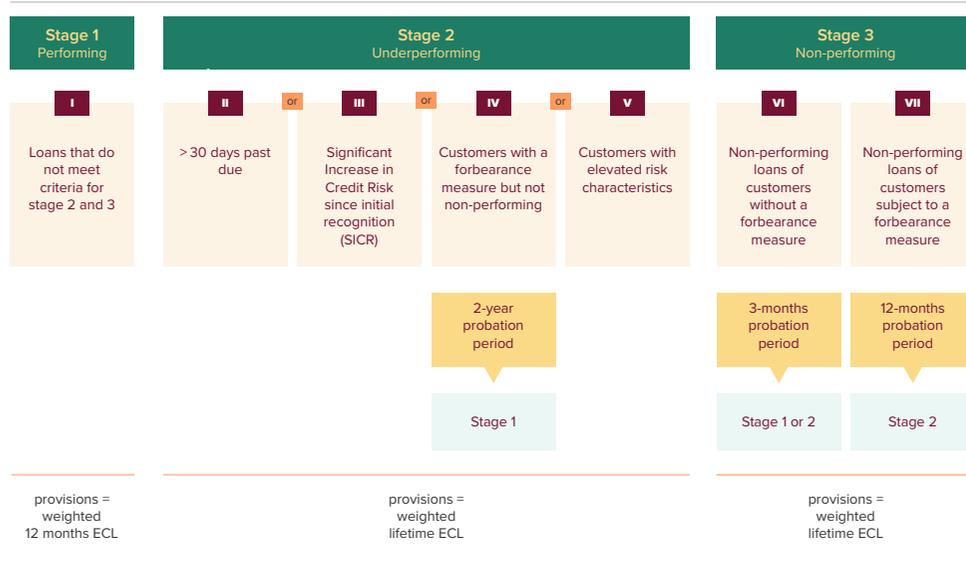
- Financial Markets portfolio (included in Other commercial and government loans, Investments and Loans and advances to banks).

ASN Bank uses a specific IFRS 9 model for every portfolio to establish customers' creditworthiness and the Expected Credit Loss (ECL). The ECL models are Point-In-Time (PIT) and forward-looking, which means that, at every reporting date, they calculate the ECL for every loan in the portfolio based on internal predictions of the present economic situation in three scenarios (base, up and down), with every scenario being assigned a probability of occurrence. The ECL outcomes of these three scenarios are probability-weighted to arrive at a final ECL estimate. Depending on the credit stage classification, either a weighted 12-month ECL (for Stage 1 assets) or a weighted lifetime ECL (for Stage 2 and Stage 3 assets) is calculated.

Updated IFRS 9 ECL model for residential mortgages

In 2025, we implemented an update of our IFRS 9 Expected Credit Loss (ECL) model for residential mortgages. The new model shows lower expected credit losses (ECL) compared to the previous model, primarily because of lower loss given default (LGD) rates driven by positive house price developments, methodological improvements in modelling and the incorporation of more recent and enhanced data. All in all, this had a decreasing impact of € 18 million on the provision for credit losses as at 31 December 2025.

Stage allocation



IFRS 9 includes three stages reflecting how the credit risk of an exposure may develop over time compared with the date of origination. The stages are decisive for the calculation method and the amount of the provision to be made. The IFRS 9 stage allocation process within ASN Bank is presented in the diagram above.

Stage 1: 12-month ECL (category I)

I. Loans that do not meet criteria for stage 2 and 3

Stage 1 includes customers with loans that have shown no significant increase in credit risk since the origination date. For these customers, we create a provision for ECL in the next 12 months.

Stage 2: lifetime ECL not credit impaired (categories II-V)

We create a provision for stage 2 customers based on losses expected until maturity (lifetime ECL). A customer is included in stage 2 if at least one of the following conditions applies:

II. A customer has been in arrears for more than 30 days

A customer is in arrears if the interest payment and/or redemption amount are past due one day after the agreed payment date (monthly payment arrangement) and exceed

a threshold value. When a customer is past due for more than 30 days, the loan is transferred to stage 2.

III. The credit rating is subject to significant deterioration (SICR trigger)

For each individual portfolio, the ECL models determine when a customer's credit rating is subject to significant deterioration (Significant Increase in Credit Risk, SICR). For the residential mortgage portfolio this deterioration is assessed by comparing the current lifetime Probability of Default (PD) with the lifetime PD assigned to the loan part on the origination date. If the difference between the two exceeds a pre-defined threshold, the lifetime PD is considered to have significantly deteriorated, the customer is allocated to stage 2. If the lifetime PD subsequently improves, the customer may be transferred back to stage 1, keeping the threshold in mind.

For the other loan portfolios, a significant deterioration in credit risk is assessed as follows:

- In the SICR model for SME loans, customers are classified into PD buckets according to their individual credit rating calculated on the loan origination date. Depending on the PD bucket, the current credit rating may show a capped deterioration compared with the loan origination date.
- Consumer loans are assigned a rating. If this rating exceeds a pre-determined limit, the credit facility is allocated to stage 2.
- For the Sustainable Finance portfolio and the private placement loans, we assess whether the current PD shows that pre-determined relative and absolute limits are exceeded compared with the PD on the loan origination date. If this is the case, the loan is allocated to stage 2.
- For the exposures in the Financial Markets portfolio, the current external credit rating and PD are used to assess whether there is a significant deterioration relative to the external credit rating and the PD upon initial recognition of the bond or loan. If pre-determined relative and absolute limits are exceeded, the bond or loan is allocated to stage 2.

IV. A forbearance measure is applied to one of the customer's contracts

Customers who have been subjected to a forbearance measure and who do not meet the prudential non-performing criteria are allocated to stage 2. This category consists of:

- 1) customers who are subject to a forbearance measure but who have not yet been classified as non-performing, and
- 2) customers who were previously part of the prudential non-performing forborene category (category VII) and were reclassified to the prudential performing forborene category after a probation period of at least one year.

Following a minimum probation period of two years, a customer is allocated to stage 1.

V. Customers with elevated risk characteristics

This category includes three types of customers with specific risk characteristics:

1. Specific interest-only customers
2. Customers with loans Purchased or Originated Credit Impaired (POCI)
3. Customers that are on the watchlist as part of the Early Warning System (EWS) of ASN Bank.

Interest-only

ASN Bank pays specific attention to retail customers with full or partial interest-only mortgage loans.

Mortgage loans with:

- High expected Loan-to-Value (LTV),
- High Loan-to-Income (LTI) and
- Nearing maturity, retirement of the borrower or the end of tax deductibility of interest payments (i.e. time-to-event) carry a higher potential risk as an affordability and/or repayment problem may arise when these events occur.

These three variables are used to distribute interest-only mortgage loans over multiple risk segments. Depending on the risk segment a collective SICR trigger is applied. In addition, future affordability information is available from an increasing number of customers as part of our customer contact strategy. The information from this affordability test is taken into account in the provisioning methodology and used to determine whether individual customer should be classified as underperforming (stage 2).

Purchased or Originated Credit Impaired (POCI)

POCI customers have at least one asset that has been purchased or originated credit impaired. As ASN Bank considers that these customers have a higher risk profile and the accounting treatment for POCI assets is dependent on lifetime ECL, the customers will remain in stage 2.

EWS Watchlist

The EWS framework consists of a two-tier approach. An early warning list is maintained to register and monitor all customers that triggered one or more early warning indicators that require closer investigation regarding credit quality deterioration. The second tier is the watchlist, which is aimed at customers that are deemed to have a deteriorating credit quality. Once a customer is on the watchlist a stage 2 transfer will apply.

Stage 3: lifetime ECL credit impaired (VI-VII)

If a customer is credit impaired, the loans provided are considered non-performing and allocated to stage 3. The provision is created based on losses expected until maturity (lifetime ECL). A loan is credit impaired in the following situations:

VI. Non-performing loans of customers without a forbearance measure

ASN Bank applies a specific definition of default to every portfolio for which loan loss provisions have to be determined. A default is considered to occur if at least one of the following conditions is met:

- the obligor is past due for more than 90 days on any material credit obligation, and/or
- the obligor is considered unlikely-to-pay (UtP).

Examples of these UtP triggers are the following:

- suspension of payment
- bankruptcy
- fraud
- sale of the collateral by the Arrears Management department
- sale of the collateral with a residual debt

Customers only recover from the default status once the arrears have been repaid in full or the UtP triggers have lapsed, and a three-month probation period has expired.

VII. Non-performing loans of customers subject to a forbearance measure

In addition, loans to customers - who are subject to a forbearance measure and who meet the prudential non-performing criteria - are allocated to stage 3. This is the case for forbore loans that were transferred to stage 2 after a one-year probation period in stage 3 and receive a new forbearance measure and/or later fall into arrears of 30 days. Customers in this category are in default due to a UTP trigger.

Risk management of ECL models

We calculate the various risks in the aforementioned portfolios at customer level on a monthly basis by means of our credit risk models. Monitoring the development of the customer and the portfolio is essential if we are to make proper estimates of the loss expected. We have provisions in place for expected losses and we maintain capital for unexpected credit losses.

Model techniques

We use various techniques for the individual portfolios to arrive at the ECL models.

Residential mortgages, SME loans, Sustainable finance loans and Private placements loans

We use the survival model technique for the residential mortgages, SME loans, sustainable finance loans and private placement loans. The survival model technique is a method for calculating the month-on-month Probability of Default (PD), Probability of Cure and Probability of Foreclosure. These models determine the creditworthiness of the customer over two periods: 1) a 12-month period; i.e. we calculate the probability of the customer defaulting on payments in the next 12 months (also known as the '12-month PD'), and 2) the remaining term of the loan; i.e. we calculate the probability of the customer defaulting on payments at any time during the remaining term of the loan (also known as the 'lifetime PD').

The total expected credit loss (ECL) is determined by customers' Probability of Default (PD), Loss Given Default (LGD) and Exposure at Default (EAD), taking into account a discount rate.

Consumer loans

We apply an expert-based model to determine stage allocation and provisioning for consumer loans, consisting of personal loans and accounts, revolving credit and overdraft facilities (credit limits on current accounts). The model calculates an individual PD at loan or account level and ranks consumer contracts from low to high risk based on risk parameters. These risk parameters include the registered arrears, use of the limit available and the date of origination. Contracts are then allocated to stages based on their credit ranking (rating). We use historical observations (default rates) to set an average PD for each stage, and the LGD is a result of the expert judgement based on historical data. We determine the ECL by multiplying the stage-dependent PD and product-specific LGD by the amount of the credit facility.

Financial Markets portfolio

For the ECL of the Financial Markets portfolio, we use a model in which the PD is derived from spreads on Credit Default Swap (CDS) curves. Specific CDS curves have been selected for various portfolio components. The ECL is the sum of the cumulative PDs multiplied by the cumulative discounted cashflows multiplied by the LGD factor. The ECL stage migration for underperforming financial instruments is based on numerical as well as qualitative triggers, such as significant increases in PD as well as three-notch credit rating downgrades. These credit ratings originate from well-known rating agencies such as S&P and Moody's.

Forward-looking information

We use three scenarios in our provisions calculations, in which we also make forward-looking information available. The three scenarios describe the expected macroeconomic forecast (baseline scenario) as well as a downside and upside development. An independent team of macroeconomic experts defines forward-looking trends based on input from a third-party provider for each scenario. In making these estimates, these experts also look at trends and forecasts of external parties, such as Eurostat, Statistics Netherlands (CBS) and the Netherlands Bureau for Economic Policy Analysis (CPB). All three scenarios describe a realistic development of the macroeconomy.

Weights are assigned to the scenarios based on the methodology of the third-party provider. The development of macroeconomic parameters is predicted thirty years ahead.

A 12-month ECL and a lifetime ECL are calculated for each of the three scenarios and for each customer, on a monthly basis. The scenario weights are used to calculate a weighted average 12-month ECL and a lifetime ECL.

For residential mortgages, we use the following macroeconomic parameters: the relative change in house prices i.e. the house price index, and the unemployment rate. For SME loans, we use the unemployment rate and the number of bankruptcies. In the model for consumer loans, we only use the unemployment rate as a macroeconomic parameter. All macroeconomic parameters of the ECL models for residential mortgages, consumer loans and SME loans are related to the developments in the Netherlands. In the ECL model for Financial Markets, the Sustainable Finance portfolio and for private placements, the macroeconomic impact is incorporated in the CDS curves used.

Scenarios and their weights are reviewed quarterly and adjusted as needed. Following challenge by first and second line experts, including second line ESG and credit risk specialists, the Asset and Liability Committee (ALCO) approves both scenarios and weights. The scenarios that are used to determine the provisions are also used to draw up our Financial Plan & Budget.

The parameters used in the three scenarios are presented in the Section [Sensitivity analyses](#) in the Annual Report 2025.

Write-off

Loans and debt securities are written off (either partially or in full) when there is no reasonable expectation of recovery and/or collectability of amounts due. When writing off a loan, we make a distinction between the waiver of amounts due and the write-off of a residual debt. The following is a description of these terms:

1. Waiver of amounts due: a loan is written off, in full or in part if the waiver of amounts payable leads to the customer's recovery. The consequence of this is that the customer can meet his or her payment obligations again. Waivers of amounts payable are debited to the credit provision;
2. Write-off of residual debt: there may be a residual debt as a result of a recovery process. This residual debt is fully provisioned for. Any collateral is realised during a period of 6 months after the execution process. After this period, any remaining debt is written off.

Management overlay

We apply a management overlay when credit-related dynamics, such as in the macroeconomic environment, are not sufficiently captured in our credit risk models. We review the elements of the management overlay at least every quarter as part of the credit risk governance process.

As at year-end 2025, a management overlay in the amount of € 34 million was in place for residential mortgages. For more information, please refer to the Section [Additional credit risk information - Management overlay](#) in the Annual Report 2025.

Credit risk in capital adequacy

To determine capital requirements for credit risk of residential mortgages, ASN Bank uses the Advanced Internal Ratings-based (AIRB) approach. The AIRB approach measures credit risk by using internal models for the calculation of PD and LGD.

For the other exposures, risk-weighted assets are determined according to the Standardised Approach (SA).

Definition of Default (DoD)

As from 31 December 2021, we have implemented a uniform definition of default (DoD) for all credit exposures, which is aligned to Capital Requirements Regulation (CRR) Article 178. A default is considered to occur if at least one of the following conditions is met:

- the obligor is past due for more than 90 days on any material credit obligation and/or;
- the obligor is considered unlikely-to-pay (UtP).

7.1.2 General quantitative information regarding credit risk

EU CR1 - Performing and non-performing exposures and related provisions 2025

in € millions	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
	Gross carrying amount/nominal amount						Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off	Collateral and financial guarantees received	
	Performing exposures		Non-performing exposures				Performing exposures - accumulated impairment and provisions		Non-performing exposures - accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions					On performing exposures	On non-performing exposures
	Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3		Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3				
005 Cash balances at central banks and other demand deposits ¹	1,719	1,719	-	-	-	-	-	-	-	-	-	-	-	-	-
010 Loans and advances ²	67,029	59,566	7,449	556	-	550	-51	-14	-36	-36	-	-36	-	60,228	475
020 <i>Central banks</i>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
030 <i>General governments</i>	1,162	1,162	-	-	-	-	-0	-0	-	-	-	-	-	15	-
040 <i>Credit institutions</i>	6,784	6,784	-	-	-	-	-2	-2	-	-	-	-	-	2,598	-
050 <i>Other financial corporations</i>	513	513	-	-	-	-	-1	-1	-	-	-	-	-	-	-
060 <i>Non-financial corporations</i>	1,741	1,688	53	66	-	66	-6	-3	-3	-14	-	-14	-	936	9
070 <i>Of which SMEs</i>	773	735	38	12	-	12	-4	-2	-3	-2	-	-2	-	756	9
080 <i>Households</i>	56,828	49,419	7,396	490	-	484	-42	-9	-33	-22	-	-22	-	56,679	466
090 Debt securities	6,871	6,871	-	-	-	-	-5	-5	-	-	-	-	-	272	-
110 <i>General governments</i>	3,527	3,527	-	-	-	-	-1	-1	-	-	-	-	-	224	-
120 <i>Credit institutions</i>	2,168	2,168	-	-	-	-	-2	-2	-	-	-	-	-	48	-
130 <i>Other financial corporations</i>	556	556	-	-	-	-	-1	-1	-	-	-	-	-	-	-
140 <i>Non-financial corporations</i>	620	620	-	-	-	-	-1	-1	-	-	-	-	-	-	-
150 Off-balance-sheet exposures	3,577	3,253	324	9	-	9	-2	-1	-2	-2	-	-2	-	1,035	7
170 <i>General governments</i>	375	375	-	-	-	-	-	-	-	-	-	-	-	-	-
190 <i>Other financial corporations</i>	9	9	-	-	-	-	-	-	-	-	-	-	-	-	-
200 <i>Non-financial corporations</i>	196	193	3	0	-	0	-1	-0	-0	-0	-	-0	-	22	-
210 <i>Households</i>	2,997	2,676	321	9	-	9	-2	-0	-1	-2	-	-2	-	1,013	7
220 Total	79,196	71,410	7,773	565	-	560	-58	-20	-38	-38	-	-37	-	61,534	482

1. Including balances held with the Central Bank required as minimum reserve

2. Excluding fair value adjustments from hedge accounting

The coverage ratio for non-performing loans and advances is 6.5% as per 31 December 2025 (31 December 2024: 14.0%). The coverage ratio for non-performing loans and advances is calculated by dividing the provisions and if applicable, the negative fair value adjustments due to credit risk for non-performing loans and advances, by the total gross carrying amount for non-performing loans and advances.

Cash balances at central banks and other demand deposits decreased by € 1.6 billion in 2025 attributable to cash management activities.

The loans and advances increased by € 5.7 billion in 2025 mainly attributable to the increase of loans and advances to households (€ 4.5 billion) and credit institutions (€ 0.6 billion).

Loans and advances to customers increased by € 4.7 billion to € 59.2 billion in 2025. This includes the IFRS fair value adjustments from hedge accounting and amortisations of € 1.5 billion negative, which is part of residential mortgages. The fair value adjustments decreased by € 449 million due to increased (long term) interest rates.

Performing exposure stage 1 increased due to new originations and recoveries from stage 2 as a result of the availability of additional income information for use in the interest-only risk segmentation. However, the accumulated impairment and provisions for stage 1 exposures decreased to € 20 million (year-end 2024: € 43 million) mostly due to the staging alignment transferring the management overlay from stage 1 to stage 2. This was partly offset by an increase because of new originations. Although stage 2 interest-only mortgage exposure decreased, the modelled provisions for credit losses related to riskier customers increased. The stage 2 accumulated impairment and provisions increased by € 3 million to € 38 million, mainly due to the aforementioned management overlay transfer.

Performing exposures - accumulated impairment and provisions decreased by € 20 million mostly due to a decrease in the provisions for mortgages.

Non-performing exposures - accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions decreased by € 43 million attributable to a write-off of € 36 million in non-financial corporations, as well as the decrease in households in stage 3.

Residential mortgages

Portfolio

The gross carrying amount on our mortgage portfolio - excluding the IFRS value adjustments¹ - increased by € 4.5 billion to € 56.5 billion (year-end 2024: € 52.0 billion). In an expanded mortgage market ASN Bank's new mortgage production increased to € 10.3 billion (2024: € 7.1 billion). The market share of new mortgages stood at 6.9%, up compared to 2024 (6.3%). 80% of new mortgage production in 2025 consisted of mortgages with a 10-year fixed rate, in line with 2024 (77%). Repayments amounted to € 5.8 billion (2024: € 4.7 billion) and interest rate renewals were € 2.7 billion, up € 1.3 billion compared to 2024.

The weighted average indexed LtV of the residential mortgage portfolio was virtually unchanged compared to year-end 2024 at 51%, as the impact of new originations with higher LtVs were offset by higher house prices.

In 2025, we refined the risk segmentation, including the staging framework for interest-only mortgages. A significant part of the interest-only mortgages previously in scope of the management overlay, has been included in the modelled part of the stage 2 provision. However, for a part of the interest-only exposure in stage 2 (€ 379 million), we calculate the credit loss provision (€ 11 million) using non-performing expected credit loss rates through the management overlay.

Provision for credit losses

In 2025, the credit loss provision declined to € 54 million (2024: € 85 million). This decrease consisted of a € 24 million reduction in the modelled provision to € 20 million, primarily driven by the updated model predicting lower losses than its predecessor and improved house prices, and a € 7 million decrease in the management overlay to € 34 million.

Management overlay

The management overlay for residential mortgages decreased by € 7 million to € 34 million (year-end 2024: € 41 million). This net change reflects three key developments. First, we implemented an enhanced model with improved methodology and performance, resulting in a € 12 million release. Second, we refined the management overlay for the interest-only mortgage portfolio: the composition of this overlay was adjusted, while the total amount remained stable at € 22 million. Furthermore, we retained the management overlay for ESG risks, which identifies physical environmental risks associated with collateral, specifically flood and drought risks in the Netherlands. Finally, we introduced a management overlay of € 5 million for geopolitical risks not captured in the model.

¹ Consist of fair value adjustments from hedge accounting and amortisations.

Provision for credit losses per stage

Stage 1 exposure increased from € 44.8 billion to € 48.6 billion due to new originations. Derecognitions increased slightly while transfers from and to stage 1 were in balance. The provision for stage 1 exposures decreased to € 7 million (year-end 2024: € 25 million), primarily due to the staging refinement transferring a part of the interest-only management overlay provision from stage 1 to stage 2. Changes in credit risk and the updated model also contributed to this release. This was partly offset by additions due to new originations.

Stage 2 exposure for residential mortgages increased by € 0.6 billion to € 7.4 billion, primarily driven by a refined SICR methodology as part of the IFRS 9 ECL model redevelopment. The stage 2 provision increased by € 7 million to € 31 million, mainly due to the interest-only management overlay transfer, partly offset by a release of € 4 million for the updated model.

The stage 3 exposure decreased slightly by € 7 million to € 466 million at year-end 2025. The largest release from the model update was recorded in stage 3 (€ 11 million) as the model predicts lower losses and due to positive house price developments. Derecognitions and a lower stage 3 management overlay also contributed to the decrease in stage 3 provisions from € 31 million to € 15 million at year-end 2025. The stage 3 coverage ratio decreased to 3.2% (year-end 2024: 6.6%).

Consumer loans**Portfolio**

The consumer loan portfolio grew slightly, as our customers were looking for more responsible lending flexibility and we could expand our offering to all customers under one ASN Bank brand.

Provision for credit losses

In 2025, the credit quality of the consumer loan portfolio slightly improved. Stage 3 exposure further decreased as did the exposure for loans and accounts in arrears. The provisions for on- and off-balance sheet items decreased due to the decline in stage 3 exposures.

SME loans**Portfolio**

ASN Bank continues to grow in the micro-sized and small-sized business loans market segment in the Netherlands. As a result, in 2025 our SME loan portfolio grew by € 148 million, from € 1,393 million to € 1,541 million.

Provision for credit losses

The credit loss provision for SME loans declined from € 16 million at year-end 2024 to € 13 million in 2025. Portfolio growth resulted in a slight increase in stage 1 provisions. Stage 3 provisions decreased slightly, as did the stage 3 exposure, resulting in a stable stage 3 coverage ratio. Loans in arrears decreased from € 43 million to € 31 million, with both short-term and long-term arrears improving. In addition, the more positive outlook in the macroeconomic scenario resulted in a reduction of the stage 2 Significant Increase in Credit Risk (SICR) population. Together, this resulted in a release of € 3 million in the stage 2 provisions.

Other corporate and government loans**Portfolio**

Other corporate and government loans mainly consist of the Sustainable Finance portfolio (€ 1.2 billion), with loans to the sustainable industry, such as solar and wind energy companies, and our Financial Markets portfolio (€ 1.3 billion) through which we provide loans to other financial institutions and central and local governments.

Since early 2025, we have suspended new sustainable finance loan origination, while reviewing our strategy and focus in this area. This will result in a steady decrease in volume due to regular and occasional early full loan repayments. We are currently investigating whether and in what form the portfolio can possibly grow again in the future.

Provision for credit losses

In 2025, the total credit loss provision for other corporate and government loans dropped to € 14 million (year-end 2024: € 40 million), mainly due to a stage 3 Sustainable Finance loan write-off of € 33 million. Despite this write-off, the stage 3 exposure increased to € 53 million, due to corporate loans transferred to stage 3. The coverage ratio dropped from 82.2% to 22.6% at year-end 2025 as the new and remaining stage 3 loans require lower provisioning levels, while the written-off loan was almost fully provided for.

EU CR1-A - Maturity of exposures 2025

In € millions	a	b	c			d	e	f
	On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated maturity	Total		
1 Loans and advances	50	8,097	2,338	56,695	319	67,499		
2 Debt securities	-	902	3,043	2,838	-	6,783		
3 Total	50	8,999	5,381	59,533	319	74,282		

In 2025, total loans and advances increased by € 5.7 billion. The increase is mainly due to increase in loans advances to credit institutions and households. The loans and advances granted from credit institutions are short-term of nature and will mature within a period less than 1 year.

Loans and advances bucket less than 1-year increased by € 1.8 billion.

Mortgage rates remained broadly stable in 2025. In 2025, majority the of new mortgage production consisted of mortgages with a 10-year fixed mortgage rate. Loans and advances bucket greater than 5 years increased by € 4.1 billion.

The NPE ratio of ASN Bank is below the 5% threshold in accordance with Article 9 (2) of Regulation (EU) 2024/3172. Therefore tables EU CQ2, EU CQ6 and EU CQ8 are not disclosed below.

EU CQ1 - Credit quality of forbore exposures 2025

in € millions	a	b	c	d	e	f	g	h
	Gross carrying amount/nominal amount of exposures with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collateral received and financial guarantees received on forbore exposures	
	Performing forbore	Non-performing forbore			On performing forbore exposures	On non-performing forbore exposures	Of which Collateral and financial guarantees received on non-performing exposures with forbearance measures	
		Of which defaulted	Of which impaired					
005 Cash balances at central banks and other demand deposits	-	-	-	-	-	-	-	-
010 Loans and advances	702	232	232	232	-6	-23	869	176
060 <i>Non-financial corporations</i>	8	44	44	44	-1	-8	9	3
070 <i>Households</i>	694	189	189	189	-6	-15	860	173
080 Debt securities	-	-	-	-	-	-	-	-
090 Loan commitments given	4	2	2	2	-0	-1	3	1
100 Total	707	234	234	234	-7	-24	872	177

The forbore exposures portfolio showed an improvement and decreased due to mortgage repayments.

EU CQ3 - Credit quality of performing and non-performing exposures by past due days 2025

in € millions	a	b	c	d	e	f	g	h	i	j	k	l
	Gross carrying amount/nominal amount											
	Performing exposures				Non-performing exposures							
	Not past due or past due ≤ 30 days	Past due > 30 days ≤ 90 days		Unlikely to pay that are not past due or are past due ≤ 90 days	Past due > 90 days ≤ 180 days	Past due > 180 days ≤ 1 year	Past due > 1 year ≤ 2 years	Past due > 2 years ≤ 5 years	Past due > 5 years ≤ 7 years	Past due > 7 years	Of which defaulted	
005 Cash balances at central banks and other demand deposits	1,719	1,719	-	-	-	-	-	-	-	-	-	-
010 Loans and advances	67,029	66,906	123	556	474	24	22	18	12	2	5	556
020 <i>Central banks</i>	-	-	-	-	-	-	-	-	-	-	-	-
030 <i>General governments</i>	1,162	1,162	-	-	-	-	-	-	-	-	-	-
040 <i>Credit institutions</i>	6,784	6,784	-	-	-	-	-	-	-	-	-	-
050 <i>Other financial corporations</i>	513	513	-	-	-	-	-	-	-	-	-	-
060 <i>Non-financial corporations</i>	1,741	1,739	2	66	62	1	3	0	0	0	0	66
070 <i>Of which SMEs</i>	773	771	2	12	8	1	3	0	0	0	0	12
080 <i>Households</i>	56,828	56,707	121	490	412	23	19	18	12	2	5	490
090 Debt securities	6,871	6,871	-	-	-	-	-	-	-	-	-	-
110 <i>General governments</i>	3,527	3,527	-	-	-	-	-	-	-	-	-	-
120 <i>Credit institutions</i>	2,168	2,168	-	-	-	-	-	-	-	-	-	-
130 <i>Other financial corporations</i>	556	556	-	-	-	-	-	-	-	-	-	-
140 <i>Non-financial corporations</i>	620	620	-	-	-	-	-	-	-	-	-	-
150 Off-balance-sheet exposures	3,577			9								9
170 <i>General governments</i>	375			-								-
190 <i>Other financial corporations</i>	9			-								-
200 <i>Non-financial corporations</i>	196			0								0
210 <i>Households</i>	2,997			9								9
220 Total	79,196	75,496	123	565	474	24	22	18	12	2	5	565

Performing exposure increased by € 4.2 billion in 2025. This is mainly attributable to an increase in the loans and advances to credit institutions and households. The increase was partly offset by the decrease of cash balances.

EU CQ4 - Quality of non-performing exposures by geography 2025

In € millions	a	c	e	f
	Gross carrying/Nominal amount	of which: defaulted	Accumulated impairment	Provisions on off-balance sheet commitments and financial guarantee given
010 On balance sheet exposures	76,175	556	-92	
020 Netherlands	62,209	551	-84	
030 Switzerland	4,963	0	-1	
040 Germany	2,271	0	-1	
050 Belgium	1,309	3	-1	
060 France	1,100	0	-1	
070 Other countries	797	0	-0	
080 United Kingdom	693	0	-0	
090 Finland	430	-	-0	
100 Denmark	402	-	-0	
110 Luxembourg	375	-	-1	
120 Czech Republic	351	-	-0	
130 Spain	284	0	-0	
140 Norway	221	0	-0	
150 Austria	219	-	-0	
160 Japan	203	-	-0	
170 Canada	195	0	-0	
180 Ireland	52	-	-0	
190 Italy	43	-	-0	
200 Slovenia	30	0	-0	
210 Sweden	15	0	-0	
220 Australia	7	0	-0	
230 United States	3	0	-0	
240 New Zealand	2	-	-0	
250 Morocco	1	1	-0	
260 United Arab Emirates	1	0	-0	
270 Türkiye	1	0	-0	
280 Hungary	1	-	-0	
290 Curaçao	1	0	-0	
300 Off balance sheet exposures	3,586	9		4
310 Netherlands	3,542	9		4
320 Germany	15	0		0
330 Spain	14	-		0
340 Belgium	7	0		0
350 Italy	3	-		0
360 France	3	0		0
370 Other countries	1	0		0
380 Total	79,762	565	-92	4

This table contains a breakdown of exposures (excl. cash balances at central banks and other demand deposits) in countries where the exposure value is larger than € 0.5 million.

ASN Bank is predominantly active in the Dutch market and especially the domestic mortgage market. The exposures outside the Netherlands are mostly caused by liquidity management activities (central government bonds, money market activities with financial institutions). Exposures to International Organisations and Multilateral Development Banks are included in Other countries.

The template is disclosed because the non-domestic exposures as at 30 June 2025 is 17.6%, which exceeds the required threshold of 10%. The NPE ratio of ASN Bank is below the 5% threshold in accordance with Article 9 (2) of Regulation (EU) 2024/3172. Therefore, column b and d in the table above are not reported.

ASN Bank does not have collateral obtained by taking possession and execution processes. Template EU CQ7 - Collateral obtained by taking possession and execution processes is therefore not included in this report.

EU CQ5 - Credit quality of loans and advances by industry 2025

In € millions	Gross carrying amount		Accumulated impairment
	a	c	
		of which: defaulted	e
010 Agriculture, forestry and fishing	1	0	-0
020 Mining and quarrying	-	-	-
030 Manufacturing	43	0	-0
040 Electricity, gas, steam and air conditioning supply	646	28	-5
050 Water supply	0	-	-0
060 Construction	36	0	-0
070 Wholesale and retail trade	35	1	-1
080 Transport and storage	4	0	-0
090 Accommodation and food service activities	2	0	-0
100 Information and communication	4	0	-0
110 Financial and insurance activities	444	4	-3
120 Real estate activities	267	4	-2
130 Professional, scientific and technical activities	213	21	-6
140 Administrative and support service activities	10	6	-3
150 Public administration and defence, compulsory social security	-	-	-
160 Education	1	0	-0
170 Human health services and social work activities	70	0	-0
180 Arts, entertainment and recreation	29	1	-0
190 Other services	2	1	-0
200 Total	1,807	66	-20

ASN Bank mainly focuses on retail customers. Therefore, the exposure to non-financial corporations is relatively small. The decrease of the total gross carrying amount are mainly due to the decrease in loans and advances in the Human health services and social work activities and the electricity, gas, steam and air conditioning supply.

The NPE ratio of ASN Bank is below the 5% threshold in accordance with Article 9 (2) of Regulation (EU) 2024/3172. Therefore, column b and d in the table above are not reported.

EU CR2 - Changes in the stock of non-performing loans and advances 2025

In € millions		a
		Gross carrying amount 31-12-2025
010	Initial stock of non-performing loans and advances	557
020	Inflows to non-performing portfolios	288
030	Outflows from non-performing portfolios	-289
040	Outflows due to write-offs	-36
050	Outflow due to other situations	-253
060	Final stock of non-performing loans and advances	556

The stock of non-performing loans and advances decreased due to the higher outflow compared to inflow in 2025.

7.2 Use of Credit Risk Mitigation techniques

ASN Bank has divided its credit risk portfolio into several exposure classes. We use the Advanced Internal Ratings-Based approach to calculate the capital requirements for the residential mortgage portfolios. We use the Standardised Approach for all other portfolios. The credit risk portfolio is presented in the Pillar 3 report in accordance with regulations: Standardised Approach (SA) versus advanced Internal Ratings-Based (IRB) approach and then further specified within the exposure classes.

7.2.1 General qualitative information regarding credit risk mitigation

Residential mortgages

We ensure that the inflow of loans meets adequate standards in respect of customer, income and collateral. We limit potential losses resulting from credit risk by setting conditions on collateral, such as the value of the collateral and possibly the issue of a National Mortgage Guarantee (NHG).

An NHG mortgage provides both the customer and the bank with additional security. On 1 January 2025, the NHG limit was set at € 450,000 and at € 477,000 in case of investments in energy-saving measures. With effect from 1 January 2026, these maximum amounts were raised to € 470,000 and € 498,200 respectively. Of the residential mortgages, € 16.1 billion (2024: € 14.1 billion), i.e. 29%, of the gross carrying amount of the exposure fell under the NHG guarantee scheme.

The weighted average indexed LtV of the residential mortgage portfolio was virtually unchanged at 51%, from 50% at year-end 2024 as new originations with a higher LtV were offset by higher house prices. In the event of foreclosure, we instruct an appraiser of our choosing to (re)value the collateral. For more information on LtV and NHG for

residential mortgages, see the Section [Credit quality of the residential mortgages](#) in the Annual Report 2025.

SME Loans

The major part of our SME loan portfolio consists of mortgages on commercial real estate. All collateralised assets are located in the Netherlands, a mature market for commercial real estate. The revaluation frequency for property depends on the amount of its exposure. If 1) the exposure exceeds € 3 million or 2) the exposure exceeds € 1 million and the LtV is above 80%, the property must be revalued every three years.

A revaluation is also initiated as part of the (arrears) management process. This is a standard procedure once the process for a loan that has been declared to be in default has been started. A revaluation is also made if, upon a check, the information received indicates that the value of the real estate has dropped sharply in comparison with general market prices. For every new mortgage or material change in a loan, a valuation report is required for all properties to which the loan pertains. For new developments, this is a valuation based on the specifications and underlying documents such as a building contract.

Other corporate and government loans

The major part of the sustainable loans we provide are loans with government-guaranteed electricity prices and/or power purchase agreements. Other corporate and government loans also have government-issued guarantees, such as loans provided to healthcare institutions and housing associations. We do not use credit derivatives as collateral.

Investments

Collateral for investments primarily concerns bonds with a financial guarantee from a government or local authority.

Loans and advances to banks

The guarantees for loans and advances to banks are guarantees issued by regional or central governments. The collateral is mainly linked to derivative transactions.

7.2.2 General quantitative information regarding credit risk mitigation

EU CR3 – CRM techniques – Overview 2025

In € millions	Unsecured carrying amount	Secured carrying amount	Of which secured by collateral	Of which secured by financial guarantees	Of which secured by credit derivatives
	a	b			
1 Loans and advances	8,515	60,703	57,906	2,797	-
2 Debt securities	6,594	272	-	272	-
3 Total	15,109	60,975	57,906	3,069	-
4 <i>Of which non-performing exposures</i>	45	475	475	-	-
EU-5 <i>Of which defaulted</i>	45	475			

The unsecured carrying amount of loans and advances decreased by € 0.4 billion and secured carrying amount of loans and advances increased by € 4.5 billion.

7.3 Use of the Standardised Approach

We distinguish the following exposure classes within the Standardised Approach (SA):

- **Central governments or central banks.** In addition to direct exposures to central governments and central banks, this also includes items covered by guarantees of these entities.
- **Regional governments or local authorities.** These are, for example, provinces, municipalities or water boards.
- **Public sector entities.** These include non-commercial administrative bodies, such as universities or university hospitals, that are accountable to central, regional or local governments.
- **Multilateral development banks.** Examples in this exposure class are the European Investment Bank and the Council of Europe.
- **International organisations.** Legal entities subject to international law, established by two or more member states and incorporated on the basis of a treaty or an agreement. An example is the European Stability Mechanism (ESM).
- **Institutions.** These are mainly credit institutions such as banks.
- **Corporates.** These include SMEs with an exposure exceeding € 1 million (excluding exposures fully and completely secured on residential property collateral) as well as large businesses. Large businesses are companies employing more than 250 people, with sales equal to or greater than € 50 million and a balance sheet total equal to or larger than € 43 million.

- **Retail.** In addition to natural persons, this category also contains SMEs with an exposure of no more than € 1 million (excluding exposures fully and completely secured on residential property collateral). SMEs are companies employing fewer than 250 people and which have an annual turnover not exceeding € 50 million, and/or an annual balance sheet total not exceeding € 43 million.
- **Secured by mortgages on immovable property and ADC exposures.** This includes exposures secured by mortgages on residential and commercial immovable property and exposures that are classified as land acquisition, development and construction.
- **Exposures in default.** All SA exposures that are either or both unlikely to pay or are more than 90 days in arrears on any material credit obligation are in default.
- **Covered bonds.** These are bonds that offer additional security to the holders by means of a first right to specific assets upon bankruptcy.
- **Equity.** This category includes exposures to equities of businesses.
- **Other items.** All other exposures that do not fall in any of the above categories are classified in this category.

ASN Bank does not have exposures in the exposure class:

- **Subordinated debt exposures**
- **Exposures to institutions and corporates with a short-term credit assessment.**
- **Collective investments undertakings.** These are equity exposures in investment funds.

7.3.1 Qualitative information regarding the use of the Standardised Approach

Under the Standardised Approach (SA), credit risk is measured using prescribed risk weights that are applied to the exposure. The application of risk weights within the SA is subject to a set of fixed rules and is primarily determined by the risk classification of the underlying asset.

External ratings issued by recognised credit rating agencies serve as input to determine the risk classification and, as a result, the risk weight in the SA measurement of risk-weighted assets (RWA). ASN Bank uses the recognised external ratings issued by Standard & Poor's, Moody's and Fitch Ratings. The credit rating is related to the credit quality steps (from high to low: 1 through 6) defined in the CRR. The CRR3/CRD6 rules indicate for various exposure classes which risk weight corresponds with which credit quality step.

The template below indicates for each exposure class, if applicable, the rating agency whose ratings are applied.

SA Ratings

Exposure classes	S&P	Moody's	Fitch	Regulatory Risk Weight
Central governments or central banks	x	x	x	
Regional governments or local authorities				x
Public sector entities				x
Multilateral development banks	x	x	x	
International organisations				x
Institutions	x	x	x	
Corporates	x	x	x	
Retail				x
Secured by mortgages on immovable property and ADC exposures				x
Exposures in default				x
Covered Bonds	x	x	x	
Equity exposures				x
Other exposures				x

Following the guidelines (CRR), we use credit ratings to determine the risk weight for an exposure, which is a standard method used to link the rating to a credit quality step (in accordance with ITS 2016/1799). If a single credit rating is available, that credit rating is used to determine the risk weight; if two credit ratings are available and the associated risk weights differ, the highest risk weight is used; If three credit ratings are available the highest associated risk weight is removed, of the two remaining risk weights the highest is used.

If no issue rating is available, we first check whether a rating has been given for a similar issue of the same counterparty, which may be adopted. If no other issue rating is available, the issuer rating – the rating provided by the issuer – may be used. If neither an issue rating nor an issuer rating exists, the risk weight for unrated exposures is used.

7.3.2 Quantitative information regarding the use of the Standardised Approach

EU CR4 – Standardised approach – Credit risk exposure and CRM effects 2025¹

in € millions Exposure classes		Exposures before CCF and before CRM		Exposures post CCF and CRM		RWAs and RWA density	
		On-balance-sheet amount a	Off-balance-sheet amount b	On-balance-sheet amount c	Off-balance-sheet amount d	RWAs e	RWA density (%) f
1	Central governments or central banks	3,206	-	16,326	225	-	0.00%
2	Non-central government public sector entities	2,726	375	2,713	150	100	3.50%
EU 2a	<i>Regional government or local authorities</i>	1,671	-	1,673	-	64	3.85%
EU 2b	<i>Public sector entities</i>	1,055	375	1,040	150	36	3.01%
3	Multilateral development banks	400	-	400	-	-	0.00%
EU 3a	International organisations	387	-	387	-	-	0.00%
4	Institutions	7,160	-	7,112	-	1,681	23.64%
5	Covered bonds	1,112	-	1,112	-	111	10.00%
6	Corporates	2,383	76	2,204	31	1,644	73.55%
6.1	<i>Of which: Specialised Lending</i>	748	65	748	26	776	100.21%
7	Subordinated debt exposures and equity	15	-	15	-	38	250.00%
EU 7b	<i>Equity</i>	15	-	15	-	38	250.00%
8	Retail	88	364	88	145	151	64.92%
9	Secured by mortgages on immovable property and ADC exposures	1,501	137	1,501	55	784	50.40%
9.1	<i>Secured by mortgages on residential immovable property - non IPRE</i>	67	6	67	2	23	33.12%
9.2	<i>Secured by mortgages on residential immovable property - IPRE</i>	17	-	17	-	7	40.01%
9.3	<i>Secured by mortgages on commercial immovable property - non IPRE</i>	1,384	131	1,384	52	730	50.80%
9.4	<i>Secured by mortgages on commercial immovable property - IPRE</i>	33	0	33	0	25	74.33%
10	Exposures in default	69	1	69	0	85	122.52%
EU 10c	Other items	381	-	381	-	295	77.62%
12	TOTAL	19,429	953	32,308	605	4,891	14.86%

1. This template excludes exposures subject to counterparty credit risk.

The total on-balance exposure before CCF and CRM decreased to € 19.4 billion by year-end 2025, which is a € 0.7 billion decrease when compared with 2024. The overall RWA increased with € 0.1 billion to € 4.9 billion.

The decrease in exposures to Central governments or central banks is mainly due to the decrease in central bank reserves by € 2.3 billion compared to year-end 2024.

The increase in Exposures post CCF and post CRM to Central governments or central banks is mainly due to the inflow NHG guaranteed (€ 13.1 billion) residential mortgages for which the substitution approach is applied.

The increase in Institutions reflects a higher amount of new outstanding short term deposits with credit institutions compared to year-end 2024. Existing exposures on counterparties remained stable.

The aggregate exposure to shadow banking entities is € 319 million by year-end 2025.

EU CR5 – Standardised approach 2025

in € millions Exposure classes		Risk weight																	Total	Of which unrated	
		0%	10%	20%	30%	35%	45%	50%	60%	75%	90%	100%	105%	110%	130%	150%	250%	Oth0 ers			z
		a	d	e	f	g	i	j	k	m	o	p	q	r	s	t	u	y			
1	Central governments or central banks	16,550	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	16,550	--
2	Non-central government public sector entities	2,369	--	489	--	--	--	5	--	--	--	--	--	--	--	--	--	--	--	2,863	70
EU 2a	Regional governments or local authorities	1,351	--	322	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	1,673	64
EU 2b	Public sector entities	1,018	--	167	--	--	--	5	--	--	--	--	--	--	--	--	--	--	--	1,190	6
3	Multilateral development banks	400	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	400	--
EU 3a	International organisations	387	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	387	--
4	Institutions	--	--	4,822	2,140	--	--	150	--	--	--	--	--	--	--	--	--	--	--	7,112	1,060
5	Covered bonds	--	1,112	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	1,112	111
6	Corporates	--	--	246	--	--	--	657	--	267	--	913	--	--	152	--	--	--	--	2,234	612
6.1	Of which: Specialised Lending	--	--	--	--	--	--	--	--	--	--	623	--	--	152	--	--	--	--	774	--
7	Subordinated debt exposures and equity	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	15	--	15	0
EU 7b	Equity	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	15	--	15	0
8	Retail exposures	--	--	--	--	--	61	--	--	172	--	0	--	--	--	--	--	--	15	233	--
9	Secured by mortgages on immovable property and ADC exposures	--	--	47	10	2	2	--	1,001	384	5	74	1	2	--	2	--	24	1,556	--	--
9.1	Secured by mortgages on residential immovable property - non IPRE	--	--	47	--	--	--	--	--	15	--	7	--	--	--	--	--	--	70	--	--
9.1.1	No loan splitting applied	--	--	--	--	--	--	--	--	1	--	7	--	--	--	--	--	--	9	--	--
9.1.2	loan splitting applied (secured)	--	--	47	--	--	--	--	--	--	--	--	--	--	--	--	--	--	47	--	--
9.1.3	loan splitting applied (unsecured)	--	--	--	--	--	--	--	--	14	--	0	--	--	--	--	--	--	14	--	--
9.2	Secured by mortgages on residential immovable property - IPRE	--	--	--	10	2	2	--	0	--	--	--	1	--	--	1	--	--	17	--	--
9.3	Secured by mortgages on commercial immovable property - non IPRE	--	--	--	--	--	--	--	1,001	369	--	66	--	--	--	--	--	--	1,437	--	--
9.3.1	No loan splitting applied	--	--	--	--	--	--	--	--	169	--	33	--	--	--	--	--	--	203	--	--
9.3.2	loan splitting applied (secured)	--	--	--	--	--	--	--	1,001	--	--	--	--	--	--	--	--	--	1,001	--	--
9.3.3	loan splitting applied (unsecured)	--	--	--	--	--	--	--	--	200	--	33	--	--	--	--	--	--	233	--	--
9.4	Secured by mortgages on commercial immovable property - IPRE	--	--	--	--	--	--	--	--	--	5	--	--	2	--	2	--	24	33	--	--
10	Exposures in default	--	--	--	--	--	--	--	--	--	--	38	--	--	--	31	--	--	69	--	--
EU 10c	Other items	0	--	106	--	--	--	--	--	--	--	274	--	--	--	--	--	--	381	--	--
EU 11c	TOTAL	19,706	1,112	5,712	2,150	2	64	812	1,001	822	5	1,299	1	2	152	34	15	24	32,913	1,854	

Under Basel IV, the NHG guarantee portion of the mortgages is reported under the Standardised Approach (SA). This gives a € 13 billion higher balance in the exposure to Central governments or central banks. Other movements in exposure and/or RWA are in line with the transition to CRR3, where different riskweights than under CRR 2 might be applicable to exposures.

The table provides the breakdown of exposure after applying CCF and CRM, under the standardised approach, by exposure class and risk weight.

The exposure in the 0% risk weight bucket increased from € 8.5 billion at year-end 2024 to € 16.5 billion at the half year 2025, mainly due to the inflow of NHG guaranteed (€ 13.1 billion) residential mortgages for which the substitution approach is applied.

7.4 Use of the advanced IRB approach to credit risk

ASN Bank uses the advanced Internal Ratings-Based (IRB) approach to calculate regulatory capital requirements for its residential mortgage portfolio. Currently, ASN Bank has no intention of including other exposure classes under the advanced IRB approach.

As of 1 January 2025, the CRR3 framework governs ASN Bank's prudential reporting and year-end 2025 regulatory capital and exposure metrics are in line with it. Metrics for year-end 2024 were reported under CRR2.

ASN Bank's permission for the use of its current advanced IRB model RegCap PHIRM to calculate the capital requirement of its mortgage portfolio was issued in October 2021. During the two-year period 2023-2025, the bank undertook an update of its advanced IRB model with the purpose of improvement of the model's ability to accurately capture mortgage credit risk and adherence to updated regulatory expectations. More information about that re-development process is provided further below.

Residential mortgages

Exposures to individual residential mortgages secured with collateral subject to a mortgage registration and possibly a National Mortgage Guarantee (NHG) are classified as loans and advances to customers. At year-end 2025, the residential mortgages portfolio comprised 93% (unchanged from 2024) of ASN Bank's total loans and advances to customers.

7.4.1 Qualitative information on the use of the advanced IRB-approach

Under the advanced IRB approach, ASN Bank assesses credit risk using supervisor-approved internal models for the calculation of Probability of Default (PD), (downturn) Loss Given Default ((DT) LGD), and Credit Conversion Factor (CCF). These risk parameters serve as inputs in the calculation of the minimum regulatory capital requirements, as well as in other risk-related processes within the bank. The IRB PD parameter also plays a role in the credit-approval process enabling the informed decision-making of credit acceptors.

Probability of Default

ASN Bank assesses debtors' credit quality by assigning them an internal risk rating. The rating reflects the probability of a customer defaulting on their obligations towards the bank within the next 12 months. It is determined based on the output of a statistical

model which takes into account customer and loan characteristics, such as loan-to-value, loan-to-income, collateral type, and customer delinquency history.

The model leads to the classification of customers in 15 different PD internal rating scales (grades): 14 scales for performing loan exposures and one scale for defaulted loan exposures.² Customers in arrears tend to be assigned to scales 10-14. Customers with loans in the so-called "Deutsche Beamten Versicherung" (DBV) portfolio segment are assigned a "standard" PD value (portfolio average PD) for the purpose of regulatory capital requirements calculation. That portfolio segment represents approximately 2.5% of ASN Bank's mortgage portfolio at year-end 2025. In template EU CR6, DBV customers are included in PD range 0.75-1.75.

Loss Given Default

In the event of customer default, a large part of the outstanding amount is usually recovered through the proceeds from the sale of the underlying collateral real estate. The actual loss for the bank is represented by the remainder (unrecovered part) of the outstanding loan amount, as well as any costs incurred during the recovery process. Together with the economic costs associated with the collateral sale, this leads to the determination of the observed Loss Given Default (LGD), measured as percentage of the exposure at default. Customers in ASN Bank's retail mortgage portfolio are assigned to LGD rating grades, which are calibrated to the long-run average observed LGD.

Downturn LGD

Regulations specify that the internal-model LGD estimates should be appropriate for an economic downturn, i.e., that the LGD model captures the expectation that losses tend to increase during unfavourable macroeconomic conditions. The so-called "downturn adjustment factor", resulting in downturn LGD risk parameter per grade, is thus estimated for the purpose of capturing credit risk and determining regulatory capital requirements in a prudent and regulatory-compliant way.

Exposure value and CCF

The exposure value reflects the outstanding obligations of a customer towards the bank, with any yet-unused credit line amounts converted to on-balance amounts through the application of a credit conversion factor (CCF).

¹ In addition to the models estimating these risk parameters, Margin of Conservatism is also considered a model within the umbrella of the regulatory capital model.

² Internal rating scales largely coincide with PD grades from the IRB PD model. Specifically, scales 1-4 and 6-15 coincide with the PD grades for the SAS portfolio segment. Scale 5 is composed of DBV customers and customers to whom binding offers have been made but the mortgage loans are not yet originated.

Conservatism framework

The conservatism framework is an integral part of the IRB model and helps quantify the uncertainty related to risk parameter (i.e., PD, LGD, and downturn LGD) estimates.

The Margin of Conservatism and Additional Conservatism are risk parameter add-ons capturing the statistical uncertainty due to methodological and data aspects of the model development process and model implementation/application, respectively. The objective of these add-ons is to ensure that the risk parameters estimated by the IRB model are sufficiently prudent in capturing credit risk.

Internal rating procedure

The internal rating procedure refers to the assignment of internal ratings to mortgage customers on ASN Bank, on the basis of the developed advanced IRB model. Ratings are automatically assigned on a monthly basis for all loans that are a part of the residential retail mortgage portfolio. Contractual obligations for future loans (binding offers) are assigned internal ratings based on exposure-weighted average PD, LGD, and downturn LGD risk parameter values.

Control mechanism for the internal rating system**Model documentation**

ASN Bank's internal guidelines stipulate that the documentation of advanced IRB models must be of sufficient detail to allow for an independent model validation. The documentation must include a description of the data used for model development, the methods used (and the rationale for their choice), all assumptions made in model development, and the strengths and weaknesses of the model. Furthermore, the assessment of compliance of the rating system with relevant legislation and regulations is also a part of the model documentation.

Initial and periodic model validation

All new or revised models are subject to a thorough validation process before the external approval process by the supervisor commences. Model Validation (MV) examines the model's methodological development, the data used for model development, the model performance, the assumptions made during model development, the regulatory compliance, and whether the model can be used for calculating risk weighted exposure amounts (RWEA) and, thus, regulatory capital requirements. The examination by MV results in a validation report and accompanying model-use advice.

MV performs annual model reviews. Just like the model monitoring process (see below), the annual review's objective is to determine the extent to which the model

performs in line with expectations, as well as whether any identified changes in model performance require a model adjustment.

Internal Model approval process

MV is an independent team that reports directly to the Model Governance Committee (MGC), which is chaired by the CRO. ASN Bank has a clear structure of the model-approval process which, as of Q4 2025, is as follows: Model owners submit risk models to the MGC for approval. The Asset Liability Committee has the opportunity to examine models' impact on capital requirements and decide on the timing of their implementation. Upon MGC approval, the model is assessed for model change materiality. If the model change is determined to be material, the model is submitted for supervisory approval and can only be deployed after such an approval is granted.

Model monitoring

Once the model is implemented, the risk management department (Regulatory Capital Office – RegCap Model Insights) performs model monitoring on a quarterly basis with the objective of assessing whether the model's predictive and explanatory power continue to be sufficient. In the event of significant difference between predicted and observed model performance, the cause is investigated and the need for a model adjustment evaluated. In such circumstances, model monitoring may lead to MGC requesting an early model review.

Audit

Audit has a standing invitation to MGC meetings and is a recipient of the model validation reports. It performs its own model review.

Supervisory authority

The advanced IRB models are assessed by the supervisory authority at the start of advanced IRB application, after a material model change, and through internal model investigations. In their model assessment, the supervisory authority evaluates the degree of model regulatory compliance, the modelling techniques used, and the model's applicability to the portfolio concerned, among others. Based on findings, if any, the supervisory authority may give instructions, request adjustments or even impose sanctions. ASN Bank must act on the supervisory authority's findings, either immediately or in a subsequent model iteration. The advanced IRB model is re-developed and submitted for assessment to the supervisory authority, when findings are addressed and/or new regulations on PD and LGD estimation (issued by the European Banking Authority) are implemented.

Other uses

While the IRB PD, LGD, and downturn LGD risk parameters' primary use is in determining prudential capital requirements, they play an essential role in a number of other risk management-related processes, such as:

- Regulatory and internal stress testing,
- Economic capital calculation,
- Pricing,
- Portfolio steering.

For the purpose of IFRS 9 provision determination, ASN Bank applies a dedicated IFRS 9 ECL model, developed using methodology comparable to that of the advanced IRB models and compliant with IFRS 9 regulations.

Regulatory capital adjustments

The difference between the estimated IFRS 9 provision for the exposures in the retail mortgage portfolio and the expected loss determined under the CRR3/CRD6 guidelines (on the basis of the advanced IRB model) results in adjustments to the Tier 1 or Tier 2 capital. When the difference is negative (expected loss exceeds provision), an IRB shortfall arises. The shortfall is subtracted from the Common Equity Tier 1 capital. When the difference is positive (provision exceeds expected loss), the resulting IRB excess is added to the Tier 2 capital, under certain regulatory restrictions.

Advanced IRB model re-development

The update of the advanced IRB model for regulatory capital calculation was initiated in 2023, under the umbrella of the Return-to-Compliance project which concerned

improvements in several components of the rating system (among them Definition of Default and IT infrastructure). Changes were motivated by the need to address regulator findings and obligations, improve model performance and accuracy in the quantitative estimation of credit risk, and align better with the constantly evolving regulations in the area of advanced IRB credit-risk models. ASN Bank applied for material change at the end of August 2025 and underwent internal model investigation of its rating system in Q3 and Q4 of 2025. Subject to supervisory approval, the updated regulatory capital model is expected to go live in 2026. Thereafter, ASN Bank's regulatory capital will be computed using that new model.

7.4.2 Quantitative information regarding the use of the AIRB-approach

As part of the Return-to-Compliance process, in the second half of 2022, ASN Bank introduced a self-imposed add-on for the purpose of RWEA calculation. As with the measures of conservatism applied to risk parameters, this add-on is monitored and updated as needed to guard against the potential risk of underestimation of ASN Bank's own fund requirements. During the 2025 reporting period, no changes to the self-imposed add-on were made.

For more information regarding the (management of the) residential mortgage portfolio see also the [Section 7.1.1 Credit risk - General qualitative information regarding credit risk](#) and [7.1.2 Credit risk - General quantitative information regarding credit risk](#).

The EU CR6 template below presents the breakdown of the residential mortgage portfolio by PD scale.

EU CR6 – AIRB approach – Credit risk exposures by exposure class and PD range 2025¹

A-IRB in € millions	PD range	On-balance sheet exposures	Off-balance-sheet exposures pre-CCF	Exposure weighted average CCF	Exposure post CCF and post CRM	Exposure weighted average PD (%)	Number of obligors	Exposure weighted average LGD (%)	Risk weighted exposure amount after supporting factors	Density of risk weighted exposure amount	Expected loss amount	Value adjust-ments and provisions
		a	b	c	d	e		f	g	i	j	k
Exposure class Retail - Secured by immovable property non-SME												
	0.00 to <0.15	24,194	322	0.75	18,259	0.13%	166,020	23.01%	1,316	7.21%	7	-5
	0.00 to <0.10	-	-	-	-	0.00%	-	0.00%	-	-	-	-
	0.10 to <0.15	24,194	322	0.75	18,259	0.13%	166,020	23.01%	1,316	7.21%	7	-5
	0.15 to <0.25	-	-	-	-	0.00%	-	0.00%	-	0.00%	-	-
	0.25 to <0.50	26,788	351	0.71	20,704	0.26%	89,019	25.82%	2,866	13.84%	19	-18
	0.50 to <0.75	1,787	52	0.41	1,767	0.61%	3,793	43.29%	749	42.37%	6	-4
	0.75 to <2.50	1,605	1,637	0.40	1,910	1.52%	12,220	29.55%	1,010	52.88%	11	-3
	0.75 to <1.75	1,515	1,637	0.40	1,831	1.49%	11,832	29.73%	963	52.60%	11	-2
	1.75 to <2.5	90	0	0.65	79	2.30%	388	25.48%	47	59.30%	1	-1
	2.50 to <10.00	1,172	210	0.43	1,156	8.12%	2,618	25.12%	1,308	113.14%	32	-6
	2.5 to <5	136	0	0.95	125	4.12%	461	25.28%	103	82.18%	2	-1
	5 to <10	1,036	210	0.43	1,031	8.61%	2,157	25.10%	1,205	116.89%	30	-4
	10.00 to <100.00	467	51	0.43	440	18.68%	1,039	30.05%	739	168.04%	33	-4
	10 to <20	391	49	0.42	378	14.33%	776	30.29%	643	170.10%	22	-3
	20 to <30	40	2	0.41	35	29.74%	132	29.22%	66	186.68%	4	-0
	30.00 to <100.00	35	0	1.00	26	66.10%	131	27.86%	30	113.84%	7	-1
	100.00 (Default)	476	7	0.77	431	100.00%	2,766	16.17%	531	123.27%	93	-15
	Subtotal (exposure class)	56,488	2,630	0.49	44,667	1.62%	277,475	25.45%	8,519	19.07%	201	-54
	Total (all exposures classes)	56,488	2,630	0.49	44,667		277,475		8,519	19.07%	201	-54

1. Including Margin of Conservatism, self-imposed add-ons, and Trim/IMI limitations.

The total exposure of the IRB portfolio grew by about 8.6% during 2025 from € 52 billion at year-end 2024 to € 56.5 billion at year-end 2025. This exposure increase together with within-portfolio adjustments resulted in some (on-balance) exposure shifts across most of the PD ranges, with the exception of the Default one, where (on-balance) exposure remained almost unchanged. Post-CCF and post-CRM exposure decreased across most PD ranges at year-end 2025 compared to year-end 2024 due to the application of credit conversion factor of 0.4 for most off-balance exposures and unfunded credit protection substitution approach (NHG guaranteed residential mortgages), as per the CRR3 regulatory framework.

As a result of the application of the substitution approach, the exposure post CCF and post CRM is € 13.1 billion lower compared to year-end 2024. This application results in a € 1.9 billion reduction of the reported IRB RWA for credit risk because NHG-

guaranteed mortgages are effectively reported as 0% risk-weighted SA exposures to central government. Pending adjustments to be made in IRB modelling regarding non-NHG mortgages, the overall RWA impact is neutralised by applying an Article 3 CRR RWA add-on of equal size.

Compared to year-end 2024, the exposure-weighted risk weight decreased slightly (from about 19.7% to about 19.1%). Some risk-composition shifts within the portfolio could be observed, with exposure-weighted PD and LGD increasing for the lower PD ranges and suggesting some credit quality deterioration.

ASN Bank does not apply F-IRB to credit risk exposures. Therefore, template EU CR6 for F-IRB approach is not applicable and therefore not included in this report.

EU CR6-A – Scope of the use of AIRB and SA approaches 2025

In € millions	Exposure value as defined in Article 166 CRR for exposures subject to IRB approach	Total exposure value for exposures subject to the Standardised approach and to the IRB approach	Percentage of total exposure value subject to the permanent partial use of the SA (%)	Percentage of total exposure value subject to IRB Approach (%)	Percentage of total exposure value subject to a roll-out plan (%)
	a	b	c	d	e
1 Central governments or central banks	-	3,206	100.00%	0.00%	0.00%
2 Regional governments or local authorities	-	2,458	100.00%	0.00%	0.00%
3 Public sector entities	-	1,430	100.00%	0.00%	0.00%
4 Institutions	-	8,272	100.00%	0.00%	0.00%
5 Corporates	-	2,502	100.00%	0.00%	0.00%
5.1 Of which Corporates - General	-	1,646	-	0.00%	0.00%
5.2 Of which Corporates - Specialised lending	-	855	100.00%	0.00%	0.00%
5.2.1 Of which Corporates - Specialised lending, excluding slotting approach	-	855	100.00%	0.00%	0.00%
5.2.2 Of which Corporates - Specialised lending under slotting approach	-	-	-	0.00%	0.00%
5.3 Of which Corporates - Purchased Receivables	-	-	0.00%	0.00%	0.00%
6 Retail	55,944	58,062	3.65%	96.35%	0.00%
6.1 of which Retail – Qualifying revolving	-	-	0.00%	0.00%	0.00%
6.2 of which Retail – Secured by residential immovable property	-	56,037	0.17%	99.83%	0.00%
6.3 Of which Retail - Purchased Receivables	-	-	0.00%	0.00%	0.00%
6.4 of which Retail - Other retail exposures	-	2,025	100.00%	0.00%	0.00%
7 Equity	-	15	100.00%	0.00%	0.00%
EU 7a Collective investment undertakings (CIU)	-	-	0.00%	0.00%	0.00%
8 Other non-credit obligation assets	-	381	100.00%	0.00%	0.00%
9 Total	55,944	76,326	26.70%	73.30%	0.00%

The decrease in exposures to Central governments or central banks is mainly due to the decrease in central bank reserves by € 1.7 and redemption of € 0.4 billion compared to year-end 2024 and the growth in mortgage loans.

Since ASN Bank does not use credit derivatives as a form of security or as an instrument to hedge credit risk, template EU CR7 AIRB approach – Effect on the RWAs is not applicable and, thus, not included in this report.

EU CR7-A – AIRB approach – Disclosure of the extent of the use of CRM techniques 2025

A-IRB in € millions	Total exposures	Credit risk Mitigation techniques						Credit risk Mitigation methods in the calculation of RWEAs	
		Part of exposures covered by Financial Collaterals (%)	Part of exposures covered by Other eligible collaterals (%)	Funded credit Protection (FCP)		Unfunded credit Protection (UFCP)		RWEA without substitution effects (reduction effects only)	RWEA with substitution effects (both reduction and substitution effects)
				Part of exposures covered by Immovable property Collaterals (%)	Part of exposures covered by Other funded credit protection (%)	Part of exposures covered by Instruments held by a third party (%)	Part of exposures covered by Guarantees (%)		
	a	b	c	d	g	j	k	m	n
6 Retail	44,667	3.88%	98.83%	98.83%	0.00%	0.00%	29.34%	10,399	8,519
6.2 Retail – secured by residential immovable property	44,667	3.88%	98.83%	98.83%	0.00%	0.00%	29.34%	10,399	8,519
7 Total	44,667	3.88%	98.83%	98.83%	0.00%	0.00%	29.34%	10,399	8,519

ASN Bank employs two types of credit risk mitigation: collateral (funded credit protection) and NHG guarantees (unfunded credit protection) for its IRB retail mortgage

portfolio. Template EU CR7-A shows that the majority of ASN Bank's IRB exposures at year-end 2025 were covered by eligible collateral or NHG guarantees.

ASN Bank does not apply F-IRB to credit risk exposures. Therefore, template EU CR7-A for F-IRB approach is not applicable and therefore not included in this report.

EU CR8 – RWEA flow statements of credit risk exposures under the AIRB approach 2025

in € million	Risk weighted exposure amount			
	a	a	a	a
	31-12-2025	30-9-2025	30-6-2025	31-3-2025
1 Risk weighted exposure amount as at the end of the previous reporting period¹	8,190	7,908	7,611	9,938
2 Asset size (+/-)	219	216	246	176
3 Asset quality (+/-)	110	67	51	-33
5 Methodology and policy (+/-)	-	-	-	-2,470
9 Risk weighted exposure amount as at the end of the reporting period	8,519	8,190	7,908	7,611

1. This template includes the RWEA flow statement per quarter.

Template EU CR8 reports quarterly RWEA amounts for the 2025 reporting period. The marked decrease of RWEA between the end of Q4 2024 and Q1 2025 is predominantly due to the transition from CRR2/ Basel III to CRR3/Basel IV regulatory frameworks. The application of the risk-weight substitution approach for NHG-guaranteed exposures under CRR3 led to a nearly € 2.1 billion reduction of the Q1 2025 reported RWEA under the advanced IRB approach. Pending further refinements in the advanced IRB models regarding non-NHG mortgages, currently this overall CRM impact is neutralised by applying an Article 3 CRR RWEA add-on of equal size.

While the residential mortgage portfolio continues to grow, a certain deterioration in credit quality is also observed throughout 2025. The resulting effect of these two factors is an increase in RWEA between Q1 and Q4 of 2025, while year-on-year RWEA decreases by about € 1.4 billion (driven by the transition to CRR3 regulation).

Model backtesting

As part of the quarterly model monitoring process, model backtesting is performed to determine the extent to which model predictions are consistent with observed model performance. Specifically, the objective is to ascertain that model predictions are of satisfactory quality in both short- and long-term. The PD model's backtest performed in Q3 2022 indicated that the model underestimates the observed default rate for some of the PD buckets.¹ Since this underestimation is a deviation from the objective of the PD estimate being through-the-cycle, an additional add-on on the PD risk

parameter was introduced at that time to mitigate the underestimation. Similarly, during the same model-monitoring cycle, DT LGD model's underestimation was established and an add-on on the DT LGD risk parameter was instated as well to ensure that the bank's regulatory capital remains adequate. Both add-ons are still applied. PD model backtests are performed annually and the result of the one as of year-end 2025 is presented in Table EU CR9.

The template below provides information on the predicted PD, realised number of defaults and default rate for the reporting 2025 period, as well as other related metrics.

¹ Mortgages in the DBV portfolio segment and mortgage binding offers are not a part of model backtesting. The backtest of the PD risk parameter excludes the Margin of Conservatism and the TRIM/IMI limitation on PD.

CR9 – AIRB approach – Back-testing of PD per exposure class (fixed PD scale) 2025

Exposure class	PD range	Number of obligors at the end of previous year		Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%) ¹
		c	d				
a	b	c	d	e	f	g	h
Retail - Secured by immovable property non-SME	0.00 to <0.15	157,870	674	0.43%	0.13%	0.13%	0.35%
	0.00 to <0.10	-	-	0.00%	0.00%	0.00%	0.00%
	0.10 to <0.15	157,870	674	0.43%	0.13%	0.13%	0.35%
	0.15 to <0.25	-	-	0.00%	0.00%	0.00%	0.36%
	0.25 to <0.50	90,042	392	0.44%	0.26%	0.26%	0.38%
	0.50 to <0.75	3,219	73	2.27%	0.61%	0.61%	1.51%
	0.75 to <2.50	10,043	77	0.77%	1.52%	1.53%	0.85%
	0.75 to <1.75	9,610	56	0.58%	1.49%	1.49%	0.71%
	1.75 to <2.5	433	21	4.85%	2.30%	2.30%	3.68%
	2.50 to <10.00	2,455	116	4.73%	8.12%	7.34%	7.03%
	2.5 to <5	575	30	5.22%	4.12%	4.12%	5.70%
	5 to <10	1,880	86	4.57%	8.61%	8.32%	7.68%
	10.00 to <100.00	790	188	23.80%	18.68%	24.01%	21.58%
	10 to <20	567	97	17.11%	14.33%	14.71%	14.79%
	20 to <30	113	33	29.20%	29.74%	29.74%	30.49%
30.00 to <100.00	110	58	52.73%	66.10%	66.10%	47.10%	
100.00 (Default)		2,514			100.00%	100.00%	

1. 5 year average historical default rate.

8. Credit valuation adjustments (CVA) risk

8.1 Qualitative disclosure regarding CVA risk

Credit Valuation Adjustment

ASN Bank calculates an own funds requirement for Credit Valuation Adjustment (CVA) risk on their derivatives exposures and, if material, on their repurchase transaction exposures. Transactions with a qualifying central counterparty are excluded from this own funds requirement. ASN Bank applies the reduced basic approach (R-BA) for determining the capital requirement in accordance with the Capital Regulatory Requirements, article 384. ASN Bank does not meet all of the conditions set out in Article 273a(2) for using the simplified approach set out in Article 385.

The CVA Risk is measured and controlled through regular exposure reporting, and is monitored through periodic assessment of the counterparties. CVA Risk is mitigated by entering the majority of the derivative transactions through central clearing counterparties and daily collateral management with our bilateral counterparties. ASN Bank does not use credit default swaps to hedge CVA Risk.

For a description of ASN Bank's policies for hedging and mitigating risk and strategies and processes for monitoring the continuing effectiveness of hedges please refer to the Section [9.1 Qualitative disclosure regarding CCR](#)

8.2 Quantitative disclosure regarding CVA risk

EU CVA1 – Credit valuation adjustment risk under the Reduced Basic Approach (R-BA) 2025

in € millions	a	b
	Components of Own Funds Requirements	Own Funds Requirements
1 Aggregation of systematic components of CVA risk	18	
2 Aggregation of idiosyncratic components of CVA risk	4	
3 Total		6

9. Counterparty credit risk

9.1 Qualitative disclosure regarding CCR

Methodology

Pillar 1 method for counterparty credit risk

ASN Bank uses the Standardised approach for counterparty credit risk specified in the CRR. The bank calculates the Exposure at Defaults (EADs) according to the SA-CCR rules.

The simplified method for calculating the exposure value of derivatives according to Article 273a of CRR is not used.

Offsetting and collateral

The bank offsets financial assets and liabilities and reports the net amount on the balance sheet if there is a legally enforceable right to offset the recognised amounts, and if there is an intention to settle the items on a net basis, or to settle the asset and the liability simultaneously. There is an enforceable right to offset amounts, provided it is not dependent on a future event and is legally enforceable under normal circumstances as well as in the case of bankruptcy. If these conditions are not met, amounts will not be offset.

Derivative positions

ASN Bank enters into derivative contracts mainly with financial institutions and qualifying central counterparties (QCCPs) primarily to hedge the interest rate and currency risks arising from its banking activities. These products expose the bank to the risk that the counterparty of a transaction defaults before the final settlement of the transaction's cash flows.

To manage this risk, the bank conducts periodic credit reviews to reassess counterparty creditworthiness and to validate that internal limits remain appropriate and aligned with the bank's risk appetite. Counterparties are continuously monitored for early-warning indicators, limit usage and other credit-related triggers. The management of counterparty credit risk is governed by the bank's risk management framework and overseen by the respective Committee.

Exposure measurement and risk mitigation

Credit risk on derivative positions is calculated in accordance with the Standardized Approach for Counterparty Credit Risk (SA-CCR) taking into account netting sets and collateral arrangements. The exposure is measured through the Exposure at Default

(EAD), which includes both the replacement cost and the potential future exposure. Additionally, Credit Valuation Adjustments (CVA) are applied to reflect counterparty credit risk in the valuation of derivative positions.

Interest rate derivative transactions are cleared mostly through a QCCP, reducing the counterparty credit risk on a specific counterparty. Derivative transactions that are not eligible for central clearing are executed bilaterally under International Swaps and Derivatives (ISDA) agreements with Credit Support Annexes (CSAs), or under Global Master Repurchase Agreements (GMRAs) in the case of repurchase transactions. Nearly all derivative transactions are subject to cash collateral agreements, with daily collateral exchanges to reflect the market value movements. Collateral value is monitored on a daily basis. Settlement risk for the bilateral foreign exchange derivative transactions is mitigated by executing them via Continuous Linked Settlement. ASN Bank does not use credit derivatives as a form of security or as an instrument to hedge credit risk.

Wrong-way risk

Wrong-way risk arises when the counterparty credit risk exposure is positively correlated with the counterparty's probability of default, such that the credit exposure increases as the counterparty's creditworthiness deteriorates. Wrong-way risk can be specific, where the exposure is directly linked to the counterparty itself, or general, where exposure and counterparty credit quality are both affected by common market or macroeconomic factors. Based on current exposures, ASN Bank has not identified any material instances of specific or general wrong-way risk, as counterparty credit exposures are mitigated through the daily exchange of cash collateral. Cash collateral does not depend on the credit profile or market value of the counterparty and therefore does not give rise to adverse correlation effects. As such, ASN Bank does not identify instances of wrong-way risk within its activities.

Other risk management objectives

Policies are in place to govern counterparty limits and revisions. The Credit Committee (CC) approves the counterparty mandates, credit limit revisions and respective policies.

Potential collateral deposit

For details about the potential collateral deposit please refer to the Section [6.2 Liquidity Coverage Ratio](#)

9.2 Quantitative disclosure regarding CCR

EU CCR1 – Analysis of CCR exposure by approach 2025¹

In € millions		a	b	c	d	e	f	g	h
		Replacement cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWEA
EU-1	EU - Original Exposure Method (for derivatives)	-	-		-	-	-	-	-
EU-2	EU - Simplified SA-CCR (for derivatives)				-	-	-	-	-
1	SA-CCR (for derivatives)	24	332		-	611	499	499	158
4	Financial collateral comprehensive method (for SFTs)					-	-	-	-
6	Total					611	499	499	158

1. This template excludes all counterparty credit risk exposures cleared through a CCP. Counterparty credit risk exposures cleared through a CCP are included in EU CCR8.

ASN Bank uses the Standardised approach for counterparty credit risk. The simplified method for calculating the exposure value of derivatives according to Article 273a of CRR is not used.

EU CCR3 – Standardised approach – CCR exposures by regulatory exposure class and risk weights 2025

in € millions		b	c	e	f	i	k	l
Exposure classes		2%	4%	20%	50%	100%	Others	Total exposure value
6	Institutions	157	63	81	3	-	344	648
7	Corporates	106	-	-	69	2	-	177
11	Total exposure value	263	63	81	72	2	344	825

Due to the implementation of CRR3 the risk weights applicable to Institutions have changed. Furthermore, one of our Central Clearing Counterparties has returned its banking licence for deposit taking and lending business, resulting in a reclassification from the asset class Institutions to the asset class Corporates.

EU CCR5 – Composition of collateral for CCR exposures 2025

Collateral type		Collateral used in derivative transactions				
		Fair value of collateral received		Fair value of posted collateral		Unsegregated
		Segregated	Unsegregated	Segregated	Unsegregated	
in € millions						
1	Cash – domestic currency	1,064	285	197	69	-
2	Cash – other currencies	-	1	-	0	-
3	Domestic sovereign debt	-	-	-	-	-
4	Other sovereign debt	-	-	431	35	-
9	Total	1,064	286	629	104	-

EU CCR8 – Exposures to CCPs 2025

in € millions		a	b
		Exposure value	RWEA
1	Exposures to QCCPs (total)		9
2	Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which	326	8
3	(i) OTC derivatives	326	8
7	Segregated initial margin	629	
8	Non-segregated initial margin	35	1
11	Exposures to non-QCCPs (total)		

10. Securitisation

10.1 Qualitative disclosure regarding securitisation exposures

ASN Bank acts as an originator of and an investor in securitisation positions. As originator, we have securitised part of our residential mortgage loan portfolio to obtain funding and to improve liquidity. As investor, we hold a relatively small portfolio of third-party securitisation notes in our Banking Book. ASN Bank does not hold any securitisation positions in its Trading Book.

ASN Band as Originator

By the end of 2025, ASN Bank securitised residential mortgages in the amount of € 8.2 billion (2024: € 8.2 billion). We only securitise residential mortgages that we originated. In securitisation transactions, the beneficial and legal title of the residential mortgages is transferred to separate entities, which are referred to as Special Purpose Vehicles (SPVs).

There are three reasons for securitising residential mortgages:

- Funding: securitisation is a funding instrument that broadens and diversifies our funding base;
- Lower capital charges: securitisation of residential mortgages enables us to reduce the risk-weighted assets;
- Liquidity: by securitising residential mortgages we create new assets that are used as collateral.

ASN Bank does not have any re-securitisation activities, nor does it perform securitisation programmes for third parties. We securitise residential mortgages under two different programmes: Pearl and Lowland.

The purpose of the Pearl programme is funding. The Lowland transactions are set up for liquidity purposes.

The senior tranches of Lowland are held for own account and qualify as eligible assets at the European Central Bank. The Pearl and Lowlands transactions outstanding are not designated as STS securitisations.

No synthetic securitisations – transactions in which it is not the assets that are transferred but merely the associated credit risks – were outstanding for ASN Bank in 2025.

An overview of the securitisations originated by ASN Bank and included in the regulatory scope of consolidation as at 31 December 2025 is provided below:

Securitisations originated						
	Initial principal	Start of securitisation	Book value		First call-option date	Contractual expiration
in € millions			2025	2024		
Pearl Mortgage Backed Securities 1 B.V.	1,014	09-2006	241	276	18-09-2026	18-09-2047
Lowland Mortgage Backed Securities 7 B.V.	8,000	04-2023	7,952	7,931	18-04-2028	18-04-2060
Total			8,193	8,207		
On own book			-8,030	-8,008		
Total			163	199		

There are no legal entities affiliated with ASN Bank that invest in securitisations originated by ASN Bank.

ASN Band as investor

By the end of 2025, ASN Bank held a portfolio of senior tranches in third-party Residential Mortgage Backed Securities (RMBS) of € 269 million (2024: € 222 million). ASN Bank has not invested in re-securitisation positions.

Risks

In the context of the securitisation programmes where ASN Bank acts as originator, we recognise several types of risk, including credit risk, interest rate risk and liquidity risk.

The credit risk from the securitisation programmes pertains to the possible credit losses on the underlying residential mortgage loans. In the Pearl 1 and Lowland transactions, ASN Bank retains the credit risk of the underlying mortgages in full. In these cases, the underlying mortgages are weighted based on the internal risk model (AIRB).

There is also counterparty risk in respect of counterparties with which risks are hedged in swap transactions. See the explanation of the interest rate risk below, which includes a description of the background of the swap transactions. The credit and counterparty risks are managed in the regular control processes for mortgage loans, counterparty risk and balance sheet management.

ASN Bank holds the interest rate risk of the residential mortgages in the outstanding Pearl transaction securitised by it on the balance sheet. The SPV hedged the interest rate risk of the securitisation with an interest rate swap, which has been executed with a third party. We executed a back-to-back swap with this third party. The interest

rate risk of the back-to-back swap is included in the regular process of managing the balance sheet. The Lowland transactions are an exception. These transactions do not include any interest rate swaps. However, interest rate risk is mitigated as the notes of the Lowland transactions have not been issued to third parties and hence are eliminated on our consolidated balance sheet.

The liquidity risk of ASN Bank's own securitisation positions pertains to the possible cash outflow. This has to do with its role of liquidity provider and the possible deposit of cash collateral in the swap transaction. The impact on the liquidity position is included in the regular process of liquidity management. See sections [6.1 Liquidity risk management](#), [7.1.1 General qualitative information regarding credit risk](#) and [10.2 Interest rate risk not included in the trading portfolio](#) for an explanation of the regular processes for credit-, interest- and liquidity risks.

Where ASN Bank acts as investor, the risks of positions in securitisations of third parties mainly pertain to credit risk of default on the underlying mortgage loans. We are limiting this risk by purchasing tranches of the highest seniority, the so-called A notes, and we are also monitoring the performance of these transactions.

Roles

ASN Bank plays various roles in its own securitisation programmes. As 'originator' we granted the underlying residential loans. In addition, we are active as 'arranger': we structure the transaction and conduct negotiations with the rating agencies. We coordinate the documentation on the transaction together with our legal advisor. As 'manager' we are co-responsible for placing securities with institutional investors, for which purpose we work together with other financial institutions.

ASN Bank can also (indirectly) act as swap counterparty for the interest rate risk management of the SPV. The SPV executes an interest rate swap with a third party that, in turn, executes a fully offsetting transaction for the swap with us. Consequently, we do not play a role as swap counterparty in the swap transactions of the SPV itself. The Lowland securitisation programme does not comprise swaps.

As 'servicer' we are responsible for the daily operational management of the underlying residential mortgages. We set up a foundation that is in charge of collecting the principal and interest payments: 'Stichting Hypotheken Incasso'. The foundation is responsible for the collection of the various mortgage payments and transfers these amounts to the relevant SPVs.

Our support of the securitisation programmes does not extend beyond our contractual obligations, nor do we act as a programme sponsor.

Following template shows the roles that ASN Bank plays in the different securitisation programmes.

Roles in securitisation programmes

Programme name	Originator	Arranger	Manager	Servicer	Swap CP (indirect)
Pearl	x	x	x	x	x
Lowland	x	x	x	x	

Policy & processes

Risk management is applied on the residential mortgage loans in the securitisation programmes. The interest rate and liquidity risks of these mortgage loans fall under the regular process for balance sheet management. See also the Section [10.2 Interest rate risk not included in the trading portfolio](#) of this report, where we explain the interest rate risk outside the Trading Book.

The credit risk is included in the regular process for monitoring mortgage loans. This process does not distinguish between securitisation positions issued or retained. That is why we do not pursue separate policies to hedge the risks relating to (retained) securitisation positions.

ASN Bank Financial Markets & Treasury conducts the operational management of the retained (unsold) or purchased securitisation positions within the mandate set by the ExBo.

The interests in securitisation positions of third parties are part of the investments by ASN Bank. Within the powers delegated to it, ASN Bank Financial Markets & Treasury is free to take positions and manage the risks of these investments.

Accounting policy for securitisation

We do not have a separate loan book containing loans that may still be securitised. For each securitisation transaction, loans to be securitised are selected from the total pool of eligible loans. Partly for that reason, we do not have a different accounting policy or classification for loans that may be eligible for future securitisation transactions. In the securitisation transactions we initiated, we transferred the underlying loans to separate SPVs at nominal value. Our economic interest in the SPVs is expressed in several ways. First of all, in most SPVs we have a large or significant direct position in the notes issued by the SPV. The size of these positions differs for each securitisation programme and may also differ in each SPV within the various programmes. Furthermore, the securitisations entitle us to a deferred selling price that is not obtained until the SPV generates positive results during the transaction.

This economic connection in combination with the other IFRS control criteria shows that ASN Bank must be considered the entity that controls the SPVs. That is why we fully consolidate the SPVs in our consolidated financial statements. On ASN Bank's consolidated balance sheet, the securitisation positions of securitisations we initiated are limited to the SPVs' monetary balances and the derivative transactions that the SPVs concluded with third parties. These securitisation positions are measured on the balance sheet at amortised cost and fair value, respectively. The consolidated balance sheet also shows securitisation positions in which we are the investor. These are positions in notes issued by these SPVs. These notes are classified as part of the investments and are measured at fair value, with gains and losses being recognised directly in equity.

Rating agencies

ASN Bank obtained credit ratings from the main credit rating agencies for its residential mortgage loans securitisations. The template below shows which credit ratings are issued by the rating agencies for the securitisation programmes active at year-end 2025.

Credit ratings securitisation programmes

Programme name	Moody's	Fitch
Pearl 1	x	x
Lowland 7	x	x

Regulatory treatment for securitisation

The regulatory scope of consolidation is the same as the IFRS scope of consolidation. For securitisations where ASN Bank acts as originator and no significant transfer of credit risk has occurred, the risk-weighted exposure is calculated for the underlying securitised mortgage loans using the internally developed AIRB model PHIRM. There is no significant transfer of credit risk for the Pearl and Lowland transactions.

For our investment in third-party securitisation positions we follow the hierarchy of RWA calculation approaches pursuant to CRR article 242 to 270e. Three RWA calculation approaches are distinguished: Internal Ratings-Based Approach (SEC-IRBA), Standardised approach (SEC-SA) and External Ratings-Based Approach (SEC-ERBA). We do not make use of the option provided for in CRR article 254 (3) to apply the SEC-ERBA instead of the SEC-SA to all securitisation positions for which an external credit rating is available or for positions in respect of which an inferred rating may be used. Following the prescribed hierarchy our third-party securitisation positions are risk weighted by the standardised approach (SEC-SA) as of the end of 2025. The new framework also introduces a specific framework for Simple, Transparent

and Standardised (STS) securitisations. Under all approaches in the hierarchy, the risk weight for STS-compliant securitisations is subject to a preferential treatment. To determine regulatory capital under the SEC-ERBA, ASN Bank uses the following External Credit Assessment Institutions (ECAIs): Fitch Ratings, Moodys Investor Service and Standard & Poor's Rating Services.

As ASN Bank does not have any positions in an ABCP programme or ABCP transaction, there are no securitisation positions subject to the Internal Assessment Approach at the end of 2025.

10.2 Quantitative disclosure regarding securitisation exposures

The tables below show explanatory figures pertaining to the securitised residential mortgages. These are exposures in the Banking Book. ASN Bank does not hold any securitisation positions in the trading portfolio.

The tables present, if applicable, the outstanding nominal values of ASN Bank's own securitisation programmes plus the investment positions in third-party securitisations.

EU-SEC1 - Securitisation exposures in the Non-Trading Book 2025

In € millions	a	b	c	d	e	f	g	l	m	n	o
	Institution acts as originator						Institution acts as investor				
	Traditional		Synthetic		Sub-total	Traditional			Sub-total		
	STS	Non-STS	of which SRT	STS		Non-STS	Synthetic				
	of which SRT	of which SRT	of which SRT								
1 Total exposures	-	-	8,078	-	-	-	8,078	269	-	-	269
2 Retail (total)	-	-	8,078	-	-	-	8,078	269	-	-	269
3 Residential mortgage	-	-	8,078	-	-	-	8,078	269	-	-	269
7 Wholesale (total)	-	-	-	-	-	-	-	-	-	-	-

Securitisation exposures consist mainly of securitisations where ASN Bank acts as originator. This exposure remained stable, and mainly consists of exposures relating the Lowland Mortgage Backed Securities (Lowland) 7.

EU-SEC4 - Securitisation exposures in the Non-Trading Book and associated regulatory capital requirements - institution acting as investor 2025

In € millions	a	b	f	g	h	j	k	l	n	o	EU-p
	Exposure values (by RW bands/ deductions)		Exposure values (by regulatory approach)			RWEA (by regulatory approach)			Capital charge after cap		
	≤20% RW	>20% to 50% RW	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA
1 Total exposures	269	-	-	-	269	-	-	27	-	-	2
Traditional											
2 securitisation	269	-	-	-	269	-	-	27	-	-	2
3 Securitisation	269	-	-	-	269	-	-	27	-	-	2
4 Retail underlying	269	-	-	-	269	-	-	27	-	-	2
5 Of which STS	269	-	-	-	269	-	-	27	-	-	2
Synthetic											
9 securitisation	-	-	-	-	-	-	-	-	-	-	-

By the end of 2025, there are no securitisations with a SEC-SA risk weight above 25%. Therefore, Article 254(2) CRR was not applicable. The total on-balance sheet securitisation exposure rose to € 269 million, from € 222 million at year-end 2024.

EU-SEC5 - Exposures securitised by the institution - Exposures in default and specific credit risk adjustments 2025

In € millions	a	b	c
	Exposures securitised by the institution - Institution acts as originator or as sponsor		
	Total outstanding nominal amount	Of which exposures in default	Total amount of specific credit risk adjustments made during the period
1 Total exposures	8,241	3	0
2 Retail (total)	8,241	3	0
3 Residential mortgage	8,241	3	0
7 Wholesale (total)	-	-	-

Total exposures where ASN Bank acts as originator had no significant changes, and mainly consist of exposures relating the Lowland Mortgage Backed Securities (Lowland) 7.

11. Market risk

11.1 Market risk qualitative disclosure

Market risk in the banking book

Interest rate risk in the banking book

Interest rate risk management aims to protect and generate stable net interest income. In the assessment and management of interest rate risks, we take into account:

- Behavioural aspects of demand deposits and mortgages;
- Effects of the current and anticipated interest rate environment;
- Effects of interest rate developments that deviate from our expectations.

When managing the banking book's interest rate risk we focus on the net interest income (NII) and market value changes perspectives to manage the short to medium-term interest rate risk. For managing long-term interest rate risk, we focus on the economic value (EV) perspective.

Both the NII and market value changes and the economic value perspectives are covered in internal reporting on the Banking Book's interest rate risk, which occurs on a monthly basis, as well as in stress testing and economic capital calculations. Limit-setting takes place in line with the bank's risk appetite.

Steering of the different perspective occurs through dynamic hedging. Offsetting asset and liabilities are targeted as natural hedges where desired and possible. Interest rate swaps and non-linear derivatives are used to further steer the balance sheet to the desired interest rate risk profile, preferably through fair value hedge accounting, but incidentally using economic hedges that entail direct P&L impact.

For modelling customer behaviour, the following key customer options are relevant:

- Customers have the option to fully or partially prepay mortgages before maturity. Typical examples of prepayments are the porting option when someone moves house, early renews a mortgage rate, or changes bank. A model is used to accurately estimate the probability of a mortgage prepaying in a certain month, given its loan characteristics and macro-economic circumstances. Important drivers are the number of houses being sold and the interest rate incentive for the customer e.g. is it beneficial given current mortgage rates to prepay.
- Customers have the option to maintain existing interest rate conditions when moving house, which is known as the porting option. Clients may prefer exercising the porting option over entering into a new mortgage contract if the interest rate on

their existing mortgage is lower than current market rates. As such, the interest rate incentive is the main driver in accounting for porting behaviour.

- Customers have the option during the application process of a mortgage to accept or reject an offer from the bank. The bank commits itself several months to a client rate without firm commitment from the customer. Historical data is used to estimate the probability of clients accepting a mortgage, as well as the period until the mortgage is activated.
- Customers have the option to withdraw their balance on savings and/or current accounts without notice. The future client rate on these products is modelled using a replicating portfolio model. Important drivers are the historic development of yield curves, liquidity spreads and client rates. A maximum maturity of 10 years is assumed for savings accounts and 20 years for current accounts. The average behavioural maturity for the whole Non Maturing Deposits (NMD) portfolio is around 2.5, well below the regulatory maximum of 5 years.

Short-term interest rate risk: NII

To determine the short-term risk to NII, we apply the NII-at-Risk measure, which expresses the change in interest income due to gradual deviations from the expected interest rate development over a horizon of one year. This assessment is based on a dynamic balance sheet, which is aligned with the regular planning process. Deviating interest rate scenarios are calibrated using statistical analysis. To capture basis risk, the NII-at-Risk calculations take into account diverging rate movements of different benchmark rates as part of the scenario-set. Complimentary to the internal perspective, the NII sensitivity is measured and steered in relation to the Supervisory Outlier Test on net interest income (SOT NII), which is based on the assumption of a constant balance sheet.

Long-term interest rate risk: economic value

When we apply the economic value (EV) methodology, we determine the economic value of equity (EVE) by considering all future incoming and outgoing cashflows based on current market rates. The key control measures of EVE sensitivity for day-to-day steering purposes are basis point values at total level and per tenor. The basis point value at total level is used to express the sensitivity of the EVE in euros in the event of a parallel interest rate increase of one basis point. The basis point values per tenor expresses this sensitivity at specific points on the yield curve, enabling us to identify sensitivity to non-parallel shifts in the market yield curve.

Complementary to the basis point value measurements, we protect the EVE against stress in market interest rates by managing its sensitivity to parallel and non-parallel curve movements of a greater magnitude, with a specific focus on potential adverse effects from (behavioural) non-linearity. We assess the sensitivity of EVE to interest rate

scenarios calibrated using statistical analysis in our internal EV-at-Risk calculations. This is supplemented by the regulatory prescribed Supervisory Outlier Test on Economic Value of Equity (SOT EVE).

Fair value impact on P&L and equity

Fair value changes of positions marked-to-market may result in P&L and/or (indirect) capital effects from marking-to-market. To manage the interest rate risk component, we monitor and manage the sensitivity of fair value movements to different interest rate scenarios for these items within our risk management framework.

Credit spread risk in the banking book

Credit spread risk in the banking book (CSRBB) refers to risk driven by changes of the market price for credit risk, for liquidity and for potentially other characteristics of credit-related instruments, which is not captured by another existing prudential framework such as IRRBB or by expected credit/(jump-to-) default risk.

The bank's CSRBB risk management framework is aligned with European Banking Authority (EBA) guidelines and incorporates European Banking Federation (EBF) interpretations. Risk metrics are based on economic value, net interest income measures, and market value changes. These metrics and associated limits are subject to monthly monitoring and reporting to the Asset and Liability Committee (ALCO).

Market risk in the trading book

Market risk management in the trading book

ASN Bank does not consider the trading book as a core activity, but it has to classify certain activities to the TB, as per the Capital Requirements Regulation (CRR). The trading book may contain exposure to interest rate risk, credit spread risk and currency risk. There is no mandate in the trading book for equity or commodity risk. The bank does not trade in credit default swaps.

Market risk measurement in the trading book

Market risk in the trading book is measured and monitored on a daily basis using Value at Risk (VaR), Expected Shortfall (ES) and dedicated stress-testing indicators. These metrics support internal risk oversight and are evaluated against formally established limits.

VaR and ES are calculated using a one-day horizon and confidence levels of 99% and 97.5% respectively. The VaR methodology is based on historical simulation and incorporates the risk factors relevant to the trading book, including interest rate, currency and credit spread movements.

The VaR and ES model forms part of the bank's internal model inventory. In line with internal governance standards, the model undergoes independent validation to ensure continued robustness and appropriateness.

Total balance sheet

Currency risk

Foreign exchange risk (or currency risk) is the risk arising from adverse foreign exchange rate movements that may change the value or the cash flows of financial instruments. Currency risk is managed by the Financial Markets & Treasury Department for both the banking book and trading book.

ASN Bank has a low risk appetite for currency risk. Currency risk is mitigated by hedging most of our foreign currency exposures through foreign exchange swaps. Currency risk is managed on a day-to-day basis. To avoid concentration risk in one single foreign currency, limits are used for the positions in each currency. These limits are reviewed periodically. All portfolios that are allowed to contain currency risk are actively monitored to ensure that they remain within the approved limits

The equivalent of the total net foreign currency exposure of the bank at the end of 2025 was € 4.6 million (2024: € 8.6 million).

Equity risk

With equity holdings in other companies totalling € 15 million (2024: € 16 million), the equity (price) risk is small.

Commodity risk

ASN Bank does not have any exposure to commodities.

11.2 Market risk quantitative disclosure

Market risk exposure trading and non-trading risk

The overview below presents the balance sheet broken down by the risks associated with the banking book and the trading book.

The market risk exposure of the trading book decreased to a carrying amount of € 185 million for assets, and decreased to € 182 million for liabilities (2024: € 427 million and € 425 million respectively).

Market risk exposure trading and non-trading risk							
in € millions	Carrying amount	Market risk measure		Carrying amount	Market risk measure		Primary risk sensitivity
	2025	Non-trading 2025	Trading 2025	2024	Non-trading 2024	Trading 2024	
Assets subject to market risk							
Investments fair value through P&L	23	23	--	12	12	--	interest rate, exchange rate, credit spread
Investments fair value OCI	4,232	4,232	--	3,931	3,931	--	interest rate, exchange rate, credit spread
Investments amortised costs	2,554	2,554	--	3,256	3,256	--	interest rate, exchange rate, credit spread
Derivatives	1,789	1,604	185	2,141	1,714	427	interest rate, exchange rate
Loans and advances to customers	59,172	59,172	--	54,494	54,494	--	interest rate
Loans and advances to banks	7,323	7,323	--	6,710	6,710	--	interest rate, exchange rate
Cash and cash equivalents	1,178	1,178	--	2,834	2,834	--	interest rate
Other	393	393	--	302	313	--	--
Total assets	76,664	76,479	185	73,680	73,264	427	
Liabilities subject to market risk							
Subordinated debts	494	494	--	997	997	--	interest rate
Debt certificates	11,873	11,873	--	9,322	9,322	--	interest rate
Derivatives	509	327	182	1,105	680	425	interest rate, exchange rate
Amounts due to customers	57,811	57,811	--	56,153	56,153	--	interest rate
Amounts due to banks	1,117	1,117	--	1,401	1,401	--	interest rate
Other	4,860	4,860	--	4,702	4,713	--	--
Total liabilities	76,664	76,482	182	73,680	73,266	425	

Market risk in the trading book

We use the standardised approach to calculate capital requirements for the Trading Book. The model covers interest rate risk and currency risk and is based on fixed risk weights.

At year-end 2025 RWA for market risk stood at € 192 million (2024: € 159 million). Market risk from cash management activities, for which its interest rate risk is internally transferred to the trading book, has increased slightly compared to year-end 2024, resulting in a slightly higher RWA for market risk in the trading book.

EU-MR1 - Market risk under the Standardised approach 2025

In € millions		a RWEAs 31-12-2025
Outright products		
1	Interest rate risk (general and specific)	192
9	Total	192

Interest rate risk in the banking book

A short description of the six supervisory shock scenarios referred to in template EU IRRBB1 below:

- parallel shock up, where there is a parallel upward shift of the yield curve with the same positive interest rate shock for all maturities;
- parallel shock down, where there is a parallel downward shift of the yield curve with the same negative interest rate shock for all maturities;

3. steepened shock, where there is a steepening shift of the yield curve, with negative interest rate shocks for shorter maturities and positive interest rate shocks for longer maturities;
4. flattener shock, where there is a flattening shift of the yield curve, with positive interest rate shocks for shorter maturities and negative interest rate shocks for longer maturities;
5. short rates shock up, with larger positive interest rate shocks for shorter maturities to converge with the baseline for longer maturities; and
6. short rates shock down, with larger negative interest rate shocks for shorter maturities to converge with the baseline for longer maturities.

EU IRRBB1 - Interest rate risks of non-trading book activities 2025

Supervisory shock scenarios In € millions ¹	a		b		c		d	
	Changes of the economic value of equity				Changes of the net interest income			
	Current period		Last period		Current period		Last period	
	31-12-2025		30-6-2025		31-12-2025		30-6-2025	
1 Parallel up	-344	-234			99	90		
2 Parallel down	82	114			-122	-113		
3 Steepener	-102	-81						
4 Flattener	45	38						
5 Short rates up	16	-18						
6 Short rates down	-19	17						

1. The scope for this table is limited to Euro, as this is the only material currency.

Table EU IRRBB 1 contains the change of economic value under six supervisory shock scenarios, as well as the change in Net Interest Income (NII) under the parallel up and parallel down scenario. For the calculation of the NII impact, a constant balance sheet assumption has been used. The parallel up and down scenarios are calculated as a 200 bps instantaneous interest rate shock.

Economic Value of Equity

The scenario with the largest negative outcome on the economic value of equity is the parallel up scenario. This scenario has a negative impact of € 344 million (half year 2025: € 234 million negative). This is mainly caused by the interest rate sensitivity of the mortgage portfolio, which is largely, but not fully hedged. The increase is mainly attributable to refinements in behavioural assumptions, in order to better reflect customers' interest rate considerations in prepayment behaviour.

Net interest income

The scenario with the largest negative outcome on net interest income is the parallel down scenario. This scenario has a negative impact of € 122 million (half year 2025: € 113 million negative). The NII sensitivity to interest rate shocks is actively steered to mitigate negative NII effects from short-term repricings. The increase is mainly attributable to minimally higher net short-term exposures on the balance sheet.

12. Operational risk

12.1 Operational (non-financial) risk qualitative disclosure

Operational (non-financial) risk

Operational risk is the risk of loss resulting from inadequate or failed internal processes, people and systems, external events, and conduct-related factors that could impact an organisation's operations, compliance, reputation, or strategic objectives.

Risk management objectives and policies (operational risk)

ASN Bank manages operational risk through an enterprise-wide risk management framework based on the COSO ERM model and a bank-wide risk management cycle that supports consistent identification, assessment, measurement, monitoring, management and reporting of risks. Operational risk management and underlying documents set mandatory requirements for the bank. Our objective is to minimise operational losses at reasonable cost while meeting regulatory requirements, with risk appetite and supporting risk indicators captured in the Risk Appetite Statement (RAS).

Structure and organisation of the operational risk management function

Operational risk governance is anchored in the three lines model: the business owns and manages risks and controls; the independent risk management and compliance functions set the frameworks, advise, monitor and challenge; and the internal audit function independently assesses the effectiveness of the first and second line. The Executive Board (ExBo) holds ultimate responsibility for risk management and is supported by risk committees, including a Non-Financial Risk Committee that reviews and assesses non-financial risk types on a quarterly monthly basis.

Scope and nature of the measurement system

For Pillar 1 capital purposes, operational risk requirements are calculated using the standardised approach. The outcome is an input to the ICAAP. For ongoing measurement and management, ASN Bank uses a risk control framework to monitor control effectiveness, evaluates and monitors issues and incidents, and applies risk indicators (including KRIs) to measure exposures against appetite.

Scope and nature of the operational risk reporting framework

The second line produces monthly and quarterly risk and compliance reports for the ExBo and its respective committees and provides these quarterly to the Supervisory Board's Risk & Compliance Committee to support oversight. Reporting includes actual indicator levels, an overall green/amber/red risk score versus appetite, and a forward-looking forecast for the next quarter, supported by an intervention ladder that

defines follow-up actions. In addition, incident and loss reporting, annual strategic risk assessments, tactical risk assessments and ad hoc analyses are used to address sudden developments and track remediation progress.

Policies and strategies for risk mitigation and risk hedge

Operational risk mitigation is primarily achieved through policy-driven risk culture and risk appetite setting, process and control design in the first line, and active monitoring and challenge by the second line-supported by targeted remediation where risk appetite is exceeded. The risk control framework supports timely identification, tracking and resolution of incidents and control issues, and "Path to Green" programmes are used to drive focused improvements for material operational risk themes. Residual operational risk is largely retained and managed through controls.

For more information, please refer to Sections Risk management and Non-financial risks in the Annual Report 2025.

12.2 Operational risk quantitative disclosure

EU OR1 - Operational risk losses 2025

In € millions		a	b	c	d	e	f	g	h	i	j	k
		T	T-1	T-2	T-3	T-4	T-5	T-6	T-7	T-8	T-9	Ten-year average
Using €20,000 threshold												
1	Total amount of operational risk losses net of recoveries (no exclusions)	2	254	6	14	16	1	1	4	8	33	34
2	Total number of operational risk losses	4	13	16	24	14	8	15	32	22	54	20
3	Total amount of excluded operational risk losses	-	-	-	-	-	-	-	-	-	-	-
4	Total number of excluded operational risk events	-	-	-	-	-	-	-	-	-	-	-
5	Total amount of operational risk losses net of recoveries and net of excluded losses	2	254	6	14	16	1	1	4	8	33	34
Using €100,000 threshold												
6	Total amount of operational risk losses net of recoveries (no exclusions)	2	254	6	14	15	1	0	3	7	31	33
7	Total number of operational risk losses	3	5	5	10	3	5	1	5	8	15	6
8	Total amount of excluded operational risk losses	-	-	-	-	-	-	-	-	-	-	-
9	Total number of excluded operational risk events	-	-	-	-	-	-	-	-	-	-	-
10	Total amount of operational risk losses net of recoveries and net of excluded losses	2	254	6	14	15	1	0	3	7	31	33

There is a steep decrease in operational losses in 2025 compared to 2024. This is mainly due operational losses being higher than normal in 2024 due to one-off events. The main driver for operational losses in 2024 was the provision for remediation of Anti-financial crime impediments.

EU OR2 - Business Indicator, components and subcomponents 2025

BI and its subcomponents		a	b	c	d
In € millions		T	T-1	T-2	Average value
1	Interest, lease and dividend component (ILDC)				1,168
EU 1	ILDC related to the individual institution/consolidated Group (excluding entities considered by Article 314(3))				1,168
1a	Interest and lease income	2,166	2,230	2,030	2,142
1b	Interest and lease expense	1,057	1,116	747	973
1c	Total assets/Asset component	76,239	72,595	69,709	72,848
1d	Dividend income/dividend component	0	0	-	0
2	Services component (SC)				278
2a	Fee and commission income	197	191	171	186
2b	Fee and commission expense	114	114	107	112
2c	Other operating income	0	0	0	0
2d	Other operating expense	2	247	25	91
3	Financial component (FC)				91
3a	Net profit or loss applicable to trading book (TB)	-5	114	86	68
3b	Net profit or loss applicable to banking book (BB)	19	-10	-39	23
EU 3c	Approach followed to determine the TB/BB boundary (PBA or accounting approach)				Accounting approach
4	Business Indicator (BI)				1,537
5	Business indicator component (BIC)				201
6a	BI gross of excluded divested activities	1,537			
6b	Reduction in BI due to excluded divested activities	-			
EU 6c	Impact in BI of mergers/acquisitions	-			

Figures are shown of the CRR3 revised standardised approach for operational risk

EU OR3 - Operational risk own funds requirements and risk exposure amounts 2025

In € millions		a
1	Business Indicator Component (BIC)	201
3	Minimum Required Operational Risk Own Funds Requirements (OROF)	201
4	Operational Risk Exposure Amounts (REA)	2,507

REA increases by € 0.5 billion, primarily driven by the transition to the CRR3 methodology. Additionally, as the REA calculation is based on a three-year rolling average, the higher net interest income in 2025 compared to 2022 contributes to a further increase in REA.

12.3 Types of risk and areas of focus

Operational risk

For operational risk, the most important sub-risks and developments of 2025 are highlighted below, specifically: people risk, technology, information security and data management risks, as well as third party risks. ASN Bank acts on the other risk types in line with the Risk Management Framework (RMF) of the bank.

People risk

People risk is the risk of breaching employment legislation, mismanaging employee relations, and failing to ensure a safe work environment.

Developments in 2025

To deliver on our strategy, ASN Bank strives to have the right workforce with appropriate skills at the right time. may impact employee morale and create uncertainty, potentially leading to higher turnover, reduced productivity, and recruitment challenges. Our ongoing transformation is expected to impact the working environment and employee morale, potentially leading to higher turnover, higher absenteeism, lower productivity, loss of key people, and insufficient inflow of capable staff. This is also reflected in our absenteeism figures, which were 5.6% in 2025, up from 5.4% in 2024. Given that the transformation may put additional pressure on absenteeism due to job insecurity and difficulties coping with change, this will require close attention in the period ahead.

For more information, see the Section [Own workforce](#) in the Sustainability statements in the Annual Report 2025.

Technology risk

Technology risk is the risk associated with the failure or outage of systems, including hardware, software and networks.

Developments in 2025

With rapid digitalisation, AI, automation and cloud developments, ASN Bank is modernising applications and infrastructure based on our strategic IT roadmap. The migration towards one ASN Bank brand accelerated this strategy, focusing on technology best practices and specific risk mitigation projects. ASN Bank must adapt to the continuously changing digital world while providing availability and continuity of applications and services, including those from external vendors. In 2025, we focused on continuous execution and improvements of incident and change management processes to maximise systems availability.

Due to ASN Bank's focus on IT outsourcing, there is substantial dependency on third-party risk management, which requires further maturation. To reduce technology risks, we phased out end-of-life applications and are modernising our infrastructure. Technology risk is monitored through a newly introduced KRI, increasing awareness and senior management involvement in risk mitigation.

Information security risk

Information Security Risk is the risk of information security incidents, including the loss, theft or misuse of data / information (this covers all types of data).

Developments in 2025

Cybercriminals are becoming more sophisticated through Ransomware-as-a-Service, and generative AI developments. Their focus has expanded from direct financial services attacks to critical infrastructure, indirectly impacting customer services.

Senior management conducted a deep-dive on information security risk in 2025 and concluded that cybersecurity needs to be a fundamental part of ASN Bank's strategy, addressing geopolitical threats, ransomware attacks, supply chain risks, DDoS attacks, and regulatory pressure. Success requires a security-first culture.

Current developments require strengthened cyber resilience which is actively enforced by the Digital Operational Resilience Act (DORA), which is incorporated into ASN Bank's policies and controls. ASN Bank invests in employee awareness as our human firewall through ongoing programmes including phishing campaigns with micro trainings, risk awareness days, and dedicated cybersecurity month activities. These initiatives strengthen our corporate security culture and mindset.

Data management risk

Data management risk is the risk of failing to appropriately manage and maintain all types of data, including customer data, employee data, and the organisation's proprietary data.

Developments in 2025

2025 marked the start of building upon 2024's foundational work while managing the bank-wide transformation impact. We strengthened data organisation by appointing a Chief Data Officer.

On the business side, we embedded data management capabilities in the new organisation. Data domains were revised to fit ASN Bank's new organisational structure. Data stewards for each domain were appointed as full-time positions, reflecting the importance of this function.

Our BCBS239 programme focuses on ensuring control over the data we process, including data lineage challenges, making sure that all data risks are managed in conformity with risk data aggregation and risk reporting (RDARR) principles. Across all data management capabilities and more, the BCBS239 programme is executed according to a detailed action plan.

Third-party risk

Third-party risk is the risk of failing to manage third party relationships and risks appropriately, for example, not taking reasonable steps to identify and mitigate additional operational risks resulting from the outsourcing of services or functions.

Developments in 2025

In 2025, ASN Bank continued strengthening its management of third-party and outsourcing risks, aligning with industry standards and European regulations. The bank ensures compliance with EBA guidelines on outsourcing arrangements and has incorporated Digital Operational Resilience Act (DORA) requirements into its policies and processes. Contract management is centralised to improve oversight of critical outsourcing arrangements, with risk analyses and due diligence conducted for all outsourcing contracts.

Compliance risk

We define compliance risk as the risk that ASN Bank fails to comply with laws, or the spirit of any such laws, additional regulations, self-regulation and any relevant codes of conduct.

The compliance function continuously monitors compliance with laws, regulations and internal policies. The taxonomy of compliance risk distinguishes five sub-risks:

- External fraud risk
- Internal fraud risk
- Conduct risk
- Financial crime risk
- Regulatory compliance risk

We ensure better identification and management of compliance risks by means of tools, such as regulatory technology, compliance management dashboards and new privacy tooling.

The bank conducted an ESG materiality assessment in 2025; the results for compliance risk are included in the Section [Sustainability risk](#).

Developments in 2025

Below, we describe the most important compliance risk-related developments in 2025.

External fraud risk

External fraud is fraud attempted or perpetrated against the organisation by an external party (i.e. a party without a direct relationship to the financial institution) without the involvement of an employee or affiliate of the organisation.

Fraud has a significant impact on society. It erodes trust in financial systems and causes personal and financial hardship for victims. Managing fraud risks is recognised by ASN Bank as an important area of attention. There are no indicators that the financial impact for fraud is high, and the control framework is currently being improved.

Developments in third party fraud in 2025

Fraud committed by external third parties was present in 2025. The primary method of external fraud in payment transactions observed by ASN Bank involved scams where individuals impersonate others, often with the intention of gaining trust and deceiving victims. Three main types were observed

- Bank helpdesk fraud: external fraudsters impersonate bank employees to obtain customer data or execute transactions. In 2025, damages were increasingly recovered from money mules.
- Investment fraud: external parties offer false investment opportunities to deceive victims.
- Dating fraud: external fraudsters use dating platforms to mislead victims into transferring money.

As fraudsters continually adapt their methods, ASN Bank continues to invest in security measures to reduce the risk of customers becoming victims of external fraud. Key measures include customer awareness campaigns, advanced monitoring and detection systems to recognise fraud patterns, and collaboration with other financial institutions and public entities to exchange information on trends and developments.

ASN Bank actively advocates for legislative improvements, including lobbying politicians for enhanced information exchange capabilities and working with the Ministry of Justice and Security to reduce online crime. Additionally, we collaborate with the Dutch Banking Association to monitor AI-related fraud trends and respond swiftly to protect customers.

Developments in first party fraud in 2025

In addition to external fraud, ASN Bank again observed mortgage fraud in applications during 2025. This constitutes first party fraud, typically involving applicants providing

false information such as manipulated pay slips, falsified bank statements, or incorrect asset declarations to obtain mortgages.

The most common cases involved fraud with income statements and concealment of unregistered debts, such as student loans. ASN Bank continued dialogue with industry associations to improve regulations, including lobbying for enhanced income verification through government sources and exploring expanded information sharing from police investigations.

In 2026, we will continue collaborating with public and private organisations to address upcoming legislation, monitor developments, and enhance our resilience against fraud through improved infrastructure and awareness programs.

Internal fraud risk

Internal fraud is fraud attempted or perpetrated by an internal party (or parties) against the organisation, i.e. an employee or affiliate of the organisation, including instances where an employee is acting in collusion with external parties.

Developments in 2025

ASN Bank remains committed to protecting its organisation from internal threats and continually invests in strengthening its preventive, detective, and responsive measures. A key development in 2025 was the enhancement of employee screening quality by revising policies and conducting quality audits with suppliers, which further reinforces our ability to identify potential risks early in the process. Through these ongoing efforts, ASN Bank contributes to maintaining a safe and reliable business operation.

Conduct risk

Ethical business conduct is fundamental to ASN Bank's strategy and essential for maintaining customer trust and a sound risk culture. Conduct risk management is embedded in our risk policies and processes, including the investigation and follow-up of concerns related to complaints, misconduct or conflicts of interest.

Developments in 2025

In 2025, we strengthened our approach to the management of conduct risk. We launched the updated Code of Conduct and carried out awareness activities to support ethical behaviour and responsible decision-making. We also encouraged reporting by clarifying how concerns can be raised and by collecting feedback from reporters to improve our SpeakUp processes.

Since establishing the SpeakUp whistleblowing desk in 2024, we have seen an increase in external reports, which has supported our efforts to reinforce integrity safeguards.

To further grow a strong and transparent risk culture, we introduced several organisation-wide initiatives, including enhanced leadership profiles, whole-system-in-the-room sessions, dilemma workshops, and keynote sessions on ethical decision-making and risk culture. These initiatives support employees in recognising, discussing, and addressing ethical issues, contributing to more structured and consistent behaviour across the organisation.

Conduct risk activities are supported by robust governance structures, including the Ethics Committee, which provides advice on ethical issues and addresses significant normative questions. The Committee consists of members from the Executive Board, senior management, the Works Council, and first- and second-line functions.

In 2026, we will continue these initiatives to further strengthen conduct risk management and deepen our values-driven risk culture.

Financial crime risk - Anti-financial crime (KYC)

See the Section [Anti-financial crime](#) in the Sustainability statements in the Annual Report 2025 for disclosures on AFC.

Privacy

ASN Bank is continuously monitoring, following up and improving its maturity level of being compliant with the privacy regulations protecting the privacy of customers, employees and other relevant stakeholders. During 2025, ASN Bank increased overall maturity in the privacy risk area but is not sufficient mature yet. Progress is made on level of maturity of the Record of Processing Activities (RoPA), Data Protection Impact Assessments (DPIA), Transfer Impact Assessments (TIA) and Legitimate Interest Assessment (LIA). These privacy risk deliverables provide important insights into sensitive processing activities and privacy risks within the bank, which are addressed and followed accordingly. Privacy risk maturity was also strengthened by several awareness and training initiatives such as 'Week of Privacy', mandatory privacy e-learning courses and multiple presentations on privacy related topics (e.g. privacy vs Artificial Intelligence (AI), How to protect your personal data, etc.). Improvement is needed on the implementation of retention term and data quality.

From an outside-in perspective, ASN Bank continuously monitors technological (AI) and societal developments regarding the processing of personal data. We continue to monitor privacy developments because of court decisions, guidelines, sanctions,

and fines announced by supervisory authorities. In particular, we took notice of developments relating to the transfer of personal data to countries outside of the European Economic Area (EEA) and the stricter interpretations of the legal grounds for processing activities with respect to consent and legitimate interests. Internally, the Data Protection Officer and the Privacy Office are focusing on systems with integrated AI capabilities and how personal data is being processed.

Regulatory compliance risk

Regulatory compliance risk is defined as the failure to comply with any legal or regulatory obligations that are not captured through other non-financial risks. Amongst others, this risk arises from failure to prepare and respond to regulatory change adequately. This definition ensures comprehensive coverage of our regulatory landscape while maintaining clear boundaries within our risk management framework. Managing regulatory compliance risk is also about protecting our customers, maintaining their trust, and protecting the broader financial system we operate. Our comprehensive approach enables us to anticipate, assess, and implement regulatory requirements in a timely and demonstrable manner and maintaining ongoing demonstrable compliance.

A range of activities contributed to managing the regulatory compliance risk in 2025. The regulatory change management process for implementing new laws and regulations within ASN Bank was evaluated and improved. A key result is the establishment of a Regulatory Change Board, mandated by the Executive Board to maintain central oversight of timely and demonstrable compliance with new or changing laws and regulations affecting ASN Bank. In addition, the way of working and ownership for implementation of cross-departmental laws and regulations was improved, which is expected to have a positive effect on legal and compliance risk. Work continues in 2026 to operationalise the new process and additionally, tooling is being developed.

ASN Bank's regulatory radar process was evaluated in 2025. Several improvements have been adapted, such as input for the implementation of cross-departmental laws and regulations and ownership, which are expected to have a positive effect on legal and compliance risk.

Model risk

Model risk is the risk that the use of models has a negative impact on society, customers, employees of the bank, or the financial position of the bank. Model risk arises from errors in the development, implementation, use, or interpretation of models, leading to inaccurate, non-compliant, or misinterpreted model output.

Developments in 2025

Model risk governance and maintenance are an ongoing process involving many discussions and iterations with the ECB, DNB and the JST. We have paid considerable attention to improving compliance with regulatory capital and provisions-related regulations, especially with respect to the residential mortgage portfolio.

The active model versions (including those for regulatory capital and the IFRS 9 provisioning for our residential mortgages) are part of our internal ongoing validation cycle in accordance with regulatory requirements and internal policies. In December 2025, model risk remains outside our risk appetite, as further improvement is required on key aspects such as data, IT infrastructure and (credit) processes, as well as in the implementation of the newly approved model risk management framework. To sufficiently mitigate this model risk in our regulatory capital model we continue to hold additional capital (a self-imposed capital add-on, SIA) with clear focus on strengthening our management and use of models.

In 2025, we have finalised the new iteration of our regulatory capital models and provisioning models for our residential mortgage portfolio. The regulatory capital models are currently undergoing a supervisory approval process. The IFRS 9 ECL model was upgraded and internally approved, for more information, see the [Section Provisioning methodology](#).

13. Remuneration policy

13.1 Qualitative information regarding remuneration policy

Scope

ASN Bank is a financial services provider engaged in banking, with a particular focus on the Dutch market. The Pillar 3 Remuneration Report focuses entirely on the remuneration of ASN Bank's Identified Staff. Identified Staff is the group of employees with a material impact on ASN Bank's risk profile. In this report, Identified Staff is divided into the following groups:

1. Management Board Supervisory function (Supervisory Board)
2. Management Board Management function (Executive Board)
3. Other senior management (reporting to the Executive Board)
4. Other Identified Staff

Identified Staff of ASN Bank is not a homogeneous group; these staff members are spread across the organisation and comprise members of the Supervisory Board, Executive Board, a part of the directors and a part of the employees falling within the scope of the collective agreement. The latter category includes, for example, employees with voting rights in certain risk committees.

In this report, total fixed remuneration includes: 12 times the fixed monthly salary, holiday pay, fixed 13th month, allowances that are regarded as fixed income and fringe benefits such as lease, pension and personnel conditions. ASN Bank does not have any variable remuneration arrangements, however, in this report ASN Bank is required to include severance payments as variable remuneration.

Principles of the remuneration policy

In determining our remuneration policy and the actual remuneration, we take account of our stakeholders, i.e. our customers, society, our employees and the shareholder. In equal situations, equal remuneration is provided; factors such as gender or ethnicity have no influence on remuneration and/or recognition. We do not consider variable remuneration linked to performance agreements to be in keeping with the social character of our bank and, for that reason, do not award any variable remuneration.

Responsibilities

The Executive Board is responsible for the remuneration policy of directors and other employees of ASN Bank. The Executive Board oversees the exceptions process for collective agreement employees and can approve exceptions for employees who fall

outside the scope of the collective agreement. Material exceptions are submitted to the Supervisory Board for approval.

The Supervisory Board adopts the remuneration report and is responsible for the implementation and evaluation of the remuneration policy for the members of the Executive Board. The Supervisory Board approves the remuneration policy for directors as proposed by the Executive Board and supervises its implementation. The Supervisory Board is also responsible for approving the outlines of the remuneration policy as proposed by the Executive Board for the other employees of ASN Bank.

The Supervisory Board discusses material retention, sign-on and severance payments and sees to it that any such payments are in keeping with ASN Bank's established remuneration policy and are not excessive. The Supervisory Board directly supervises the remuneration of the directors with ultimate responsibility for the departments Risk, Compliance and Internal audit. The Supervisory Board does so on the basis of the Annual Remuneration Policy Review Report drawn up by Compliance and HR.

The Selection, Nomination & Remuneration Committee (SNRC) of the Supervisory Board has, where applicable, prepared the decision-making for the Supervisory Board on subjects relating to selection, nomination and remuneration. The SNRC was held six times in 2025 (including shared meetings with other committees). At year-end 2025, the SNRC consisted of three members of the Supervisory Board, namely: Jeanine Helthuis (Chair), Gerard van Olphen and Aloys Kregting.

In 2025, Willis Towers Watson, a global consulting firm, conducted a benchmark of the remuneration of the Executive Board. The benchmark did not result in changes to the Executive Board's remuneration policy.

On the one hand, it is understandable restrictions have been imposed in exchange for the State aid received and it was ASN Bank's own decision not to want to offer compensation at top market level. On the other hand, the salary freeze, which has been in force for many years now, is increasingly becoming a barrier to attract and retain executive directors for ASN Bank. While regulatory requirements imposed on executive directors have increased enormously in recent years, and more and more is expected of them in terms of content. However, legislation does not allow remuneration to be set at an appropriate level, which represents a strategic risk for the company going forward.

Governance

The implementation of the remuneration policy is the responsibility of line management in collaboration with HR. Risk, Compliance, Legal and HR who supervise the greatest

remuneration policy implementation risks and provide risk management and policy-related advice. HR conducts an annual remuneration risk analysis and Compliance conducts an annual review of the application of the remuneration policy.

Performance objectives and link with remuneration

The SB determines the performance objectives for the ExBo annually. These are derived from the strategic (long term) objectives of ASN Bank. In doing so, the SB takes into account the desired risk profile, sustainability legislation (ESG) and the sustainability ambitions of ASN Bank. These themes are safeguarded every year. Furthermore, the SB takes into consideration the interests of all stakeholders of ASN Bank. The performance objectives are converted into measurable and achievable KPIs at ExBo level, after which they are cascaded to the relevant functions. The performance objectives and corresponding KPIs are evaluated annually. In exceptional circumstances the ExBo has the opportunity to adjust one or more KPIs to reflect changing circumstances and business objectives.

As Executive Board members are only entitled to a fixed remuneration, there are no remuneration incentives that could prioritise individual short-term interests above collective long-term objectives. At the end of each performance period, the Supervisory Board not only assesses the performance of the Executive Board in relation to achieving its KPIs. The Supervisory Board also assesses the progress on the (long-term) objectives.

Performance year 2025		
Aspect	Associated Main KPIs, if applicable	Weight
Finance	Adjusted Cost/income ratio	15%
	Adjusted Return on Equity	
	Common Equity Tier 1 ratio	
	Leverage ratio	
Transformation		20%
Retail	Net Promoter Score	20%
	Number of active multi-customer	
Operations & IT		15%
Risk & Compliance		20%
ESG	Climate neutral balance sheet	5%
Staff	Employee engagement	5%
		100%

The Supervisory Board assesses to what extent the performance objectives have been achieved. They have established that the performance objectives have been achieved by 61%. The SB emphasises that this realisation should be viewed in the context of the highly ambitious performance objectives that were set for 2025. While the numerical score of 61% does possibly not fully capture this context, the SB is of the view that the progress made and the impact delivered by the ExBo in 2025 have been substantial and appreciated.

The following table shows the performance objectives that have been set for 2026:

Performance year 2026		
Aspect	Associated Main KPIs, if applicable	Weight
Finance	Adjusted Cost/income ratio	15%
	Adjusted Return on Equity	
	Common Equity Tier 1 ratio	
	Leverage ratio	
Commercial:		
- Primary customers	Net Promoter Score Primary customers	20%
- Grow mortgages		
- Grow savings		
- Improve payments		
Increase sustainable impact	Towards net zero in 2050	10%
Right size and simplify organisation		15%
Modernise IT & Data		15%
In control & Risk Appetite		15%
Increase execution power	Employee engagement	10%
		100%

For more information about the compensation of the Executive Board and the Supervisory Board and also about the performance please refer to the Section 'Remuneration Report' in Annual Report 2025.

13.2 Quantitative information regarding remuneration policy

EU REM1 - Remuneration awarded for the financial year 2025

in € thousands		a	b	c	d
		MB Supervisory function	MB Management function	Other senior management	Other identified staff
1	Number of identified staff	5	5	20	27
2	Total fixed remuneration	300	2,389	6,630	5,697
3	Of which: cash-based	300	2,389	6,630	5,697
EU-4a	Fixed remuneration				
	Of which: shares or equivalent ownership interests	-	-	-	-
5	Of which: share-linked instruments or equivalent non-cash instruments	-	-	-	-
EU-5x	Of which: other instruments	-	-	-	-
7	Of which: other forms	-	-	-	-
9	Number of identified staff	-	-	7	9
10	Total variable remuneration	-	-	1,530¹	1,479¹
11	Of which: cash-based	-	-	1,530 ¹	1,479 ¹
12	Of which: deferred	-	-	-	-
EU-13a	Of which: shares or equivalent ownership interests	-	-	-	-
EU-14a	Variable remuneration				
	Of which: deferred	-	-	-	-
EU-13b	Of which: share-linked instruments or equivalent non-cash instruments	-	-	-	-
EU-14b	Of which: deferred	-	-	-	-
EU-14x	Of which: other instruments	-	-	-	-
EU-14y	Of which: deferred	-	-	-	-
15	Of which: other forms	-	-	-	-
16	Of which: deferred	-	-	-	-
17	Total remuneration (2 + 10)	300	2,389	8,160	7,176

1. ASN Bank has no variable remuneration schemes, the reported amounts are severance payments.

The template above includes information on the remuneration awarded to staff whose professional activities have a material impact on the risk profile of ASN Bank (identified staff).

EU REM2 - Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff) 2025

In € thousands		a	b	c	d
		MB Supervisory function	MB Management function	Other senior management	Other identified staff
Guaranteed variable remuneration awards					
1	Guaranteed variable remuneration awards - Number of identified staff	-	-	-	-
2	Guaranteed variable remuneration awards - Total amount	-	-	-	-
3	Of which guaranteed variable remuneration awards paid during the financial year, that are not taken into account in the bonus cap	-	-	-	-
Severance payments awarded in previous periods, that have been paid out during the financial year					
4	Severance payments awarded in previous periods, that have been paid out during the financial year - Number of identified staff	-	1	-	-
5	Severance payments awarded in previous periods, that have been paid out during the financial year - Total amount	-	71	-	-
Severance payments awarded during the financial year					
6	Severance payments awarded during the financial year - Number of identified staff	-	-	7	9
7	Severance payments awarded during the financial year - Total amount	-	-	1,530	1,479
8	Of which paid during the financial year	-	-	1,264	778
9	Of which deferred	-	-	-	-
10	Of which severance payments paid during the financial year, that are not taken into account in the bonus cap	-	-	-	-
11	Of which highest payment that has been awarded to a single person	-	-	266	312

EU REM5 - Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (identified staff) 2025

In € thousands	a	b	c	d	e	f	g	h	i	j	
	Management body remuneration			Business areas							Total
	MB Supervisory function	MB Management function	Total MB	Investment banking	Retail banking	Asset management	Corporate functions	Independent internal control functions	All other	Total	
1	Total number of identified staff										57
2	5	5	10								
3					5		9	6			
4					9	4	8	6			
5	Total remuneration of identified staff										
6					1,606		431	972			
7	300	2,389	2,689		3,208	739	5,230	3,150			

14. ESG risks and other sustainability disclosures

14.1 ESG qualitative disclosures

Sustainability governance

The Supervisory Board exercises oversight over the exposures and responses relating to ESG risks. It sets performance objectives for the Executive Board (ExBo), including performance objectives for our impact on society and aligned with (long-term) strategic objectives. By doing so, they consider ASN Bank's desired ESG related risk profile in the Supervisory Board's ESG Committee. In accordance with the suitability requirements, the management body has an induction and lifelong learning programme. On 18 December 2025, an educational session was organised for the Supervisory Board and Executive Board on sustainability and climate and environmental risks.

The ExBo is responsible for managing the overall sustainability objectives and ESG risks, and is the highest governing body for sustainability. The ExBo approves the strategic direction and targets, oversees our performance on material sustainability impacts, risks and opportunities (IROs) as well as policies, actions and targets, and approves the double materiality assessment results annually. The ExBo is presented with a progress update quarterly across strategic priorities and targets to further integrate the developments into its execution and oversight of the overall strategy.

The ExBo and its members are both individually and collectively responsible for sustainability and for identifying, monitoring and signalling developments in the exposures for sustainability risk. To increase efficiency and allow greater focus in specific risk areas and/or business themes, the ExBo has established committees to properly manage sustainability topics and the daily management for sustainability is taken care of within the COO domain.

The ESG Impact Committee (ESG IC) is a risk committee chaired by the CRO. The ESG IC steers and monitors the implementation of ASN Bank's Sustainability strategy (including approval of ASN Bank's sustainability policy) and monitors compliance with regulations, guidelines and commitments. The committee also oversees all ESG-related KRIs in the risk taxonomy.

Risk and Compliance departments (second line) are responsible for monitoring that ESG risks are adequately controlled and that laws and regulations are implemented by the first line. Internal Audit, as the third line, is responsible for assessing whether

the interaction between the first and second lines functions smoothly and providing an objective independent judgement on this.

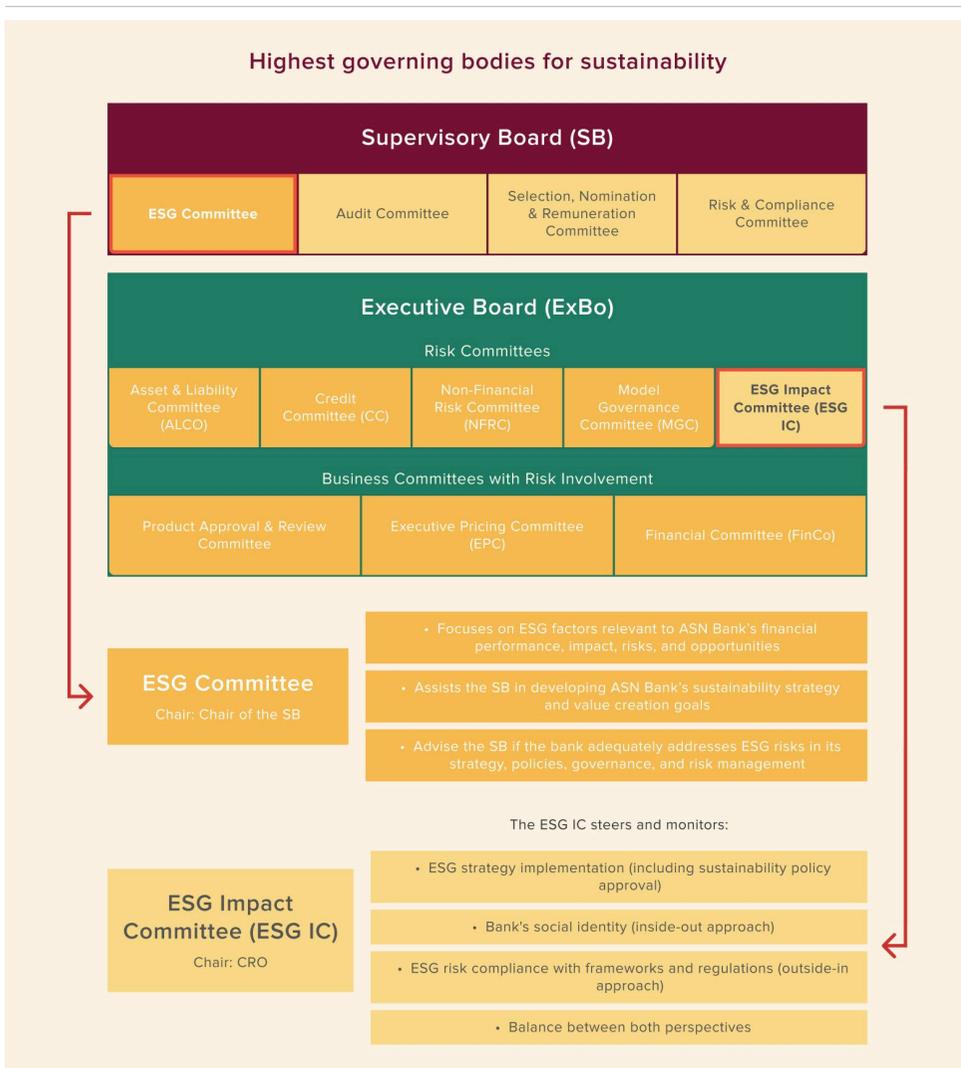
ASN Bank has monthly and quarterly risk reports in place, which include ESG risks. These monitoring reports consist of two levels:

- Level 1: Enterprise level (ASN Bank)
- Level 2: Business line level (i.e. department level)

Level 1 risk indicators are reported to the ExBo and Supervisory Board by the second line. Level 2 indicators are reported to specific risk committees by the first line or the second line. KRIs with an actual risk profile outside the ESG-related risk appetite must receive heightened management oversight and attention from the risk committee. The first line must define and execute actions to have these KRIs comply with the risk appetite again. The first line also submits a progress report on the progress made towards fulfilling the net zero KPI.

The ESG IC also regularly receives implementation progress reports on the fulfilment of ESG laws and regulations, such as the progress on the implementation of the EBA Guidelines on management of ESG Risk.

The expected impact of decisions on our four stakeholder groups, i.e. customers, society, employees and the shareholder, is included in the decision-making in all ExBo and ESG IC meetings. For detailed information on ASN Bank's governance structure, the role of the highest governance bodies and their composition and diversity, please refer to the Section Leadership and governance of the Annual Report.



(long term) strategic objectives, and in setting them the Supervisory Board takes into account ASN Bank's desired ESG risks-related risk profile. For details, see the Section [Performance objectives and link with remuneration](#).

Sustainability policies

The purpose of our sustainability policies is to minimise the negative impact and increase our positive impact we have through our investments and loans. We also use the sustainability policies for due diligence and to identify, monitor and mitigate ESG risks as much as possible.

These policies cover all our investments, financing activities and own operations. As our sustainability policies and criteria continue to evolve, or where issuers of bonds become involved in controversies, certain legacy bond holdings may no longer align with our current sustainability standards. In such cases, we do not initiative new investments in the affected counterparties. However existing holdings may be retained and managed in a prudent manner rather than divested immediately. Several components of our policies relate to how counterparties approach ESG risks. We apply our policies at three levels: sustainability policies, specific sustainability policies and applied sustainability policies.

Sustainability Policies and Specific Sustainability Policies

The Sustainability Policies (SPs) have three pillars: climate, biodiversity and human rights. We assess countries, organisations and businesses based on these sustainability policies. The approach to our SPs consists of two elements: 1) a set of sustainability criteria to exclude or avoid investments that have a negative impact and 2) a set of criteria to assess how to support investments that contribute to sustainability. Below, we elaborate on the two elements of our approach for each pillar.

We update our SPs so that it incorporates recent developments. In 2026, we will review and align our sustainability policies with our new strategy, enabling the bank to support transition and to grow in sustainable products and services. The SPs and Specific Sustainability Policies (SSPs) contain information regarding the sustainability criteria for our investments in for example corporate and sustainable bonds. We engage with our stakeholders including NGOs, other financial institutions, academics, politicians and the media. Our policies are available for our stakeholders on our website. In SSPs, we provide additional guidance and criteria for specific topics or sectors.

Climate

Our sustainability criteria exclude in entities with a substantial negative impact on climate change. Instead, we support investments that contribute to combating

Sustainability-related performance in incentive schemes

ASN Bank has no variable remuneration scheme. Nevertheless, every year the Supervisory Board sets performance objectives for the ExBo, including performance objectives for our impact on society. These objectives are derived from ASN Bank's

climate change. We do not invest fossil fuel exploration, production, or fossil-fuelled electricity generation.

Biodiversity

Our biodiversity criteria are in line with the main threats concerning loss of nature and biodiversity: land use change, overexploitation, climate change, invasive and exotic species, and pollution. We promote projects that aim to protect nature and relieve the pressure that society puts on it. This includes renewable energy and circular economy projects that lead to lower natural resources consumption.

Human rights

We have a wide range of policies to avoid violations of human rights in our loan and investment portfolios. Direct investments in companies that are involved in the development and manufacturing of or trade in armaments are therefore excluded. All listed companies are screened and then monitored periodically to ensure they meet this policy. We can, however, invest in government bonds, non-combat equipment, and dual-use technologies and goods, which can serve both civilian and defence purposes.

Examples of criteria to support investments that uphold collective, human and labour rights are: equal treatment and anti-discrimination, no forced or child labour, safe and healthy working conditions, freedom of association and respect for the rights of local communities and indigenous people. This is in line with the Core Conventions of the International Labour Organization. Our policy also addresses human rights in our own operations and own workforce, consumers and end users in scope.

Human rights due diligence

Our human rights policy prescribes how we conduct our human rights due diligence. In 2023, we conducted a salience risk analysis following the United Nations Guiding Principles for Business and Human Rights. This analysis showed that the risks of forced labour and degradation of livelihoods in the mining and metals chain are the most salient human rights risks through for example our investments related to renewable energy. Yet these risks are not assessed as material for ASN Bank. In 2026, we aim to conduct a new human rights salience analysis, the results of the 2023 analysis remain relevant for our sustainability policies.

Our sustainable energy policy strengthens our focus on identifying and addressing human rights risks throughout the supply chain. We pay particular attention to the risk of forced labour in solar panel and battery supply chains. ASN Bank is also a supporting partner of the IRBC covenant for the renewable energy sector. The purpose is to jointly tackle and prevent risks in the area of human rights violations and environmental

damage by collaborating with solar and wind energy companies, industry associations, the Dutch government, knowledge institutes, NGOs and trade unions.

Several components of our policies are related to how our counterparties deal with social risks, such as their attitude towards human rights, the (local) community and society, employee relationships and labour standards, customer protection and product responsibility, healthcare, a living wage, privacy, housing, and social needs.

Applied Sustainability Policies

The Applied Sustainability Policies specify how our sustainability policies are implemented in various processes. The responsibility for implementing these operational policies lies with the relevant departments.

Foundation of our policies

ASN Bank is guided by international treaties and conventions as fundamental starting points for our sustainability policies, aimed at a sustainable society for current and future generations. For an overview of guiding principles see the image Foundation of our policies.

Implementation of the sustainability policies in relation to counterparties we invest in or finance

As we invest in several different asset classes with different risks profiles, the way these policies are implemented varies. As described in this section, the sustainability policies also relate to the governance performance of our counterparties. The governance concerning the sustainability performance of these asset classes differs.

In general, ASN Bank has no specific governance body responsible for deciding whether or not to do business with a counterparty. Our Sustainability team develops sustainability policies. These policies are discussed with all relevant internal stakeholders, who can give their input. The ESG Impact Committee is responsible for approving and implementing the sustainability policies. The Sustainability team analyses whether a potential loan or investment is in line with our Sustainability Policies. The Sustainability team advises the departments responsible for purchasing or investing in the counterparties. In addition, we do not systematically take into account the role of a counterparty's highest governing body in the approval of its non-financial reporting. This applies to all the categories listed below.

Corporate and green bonds

We conduct an assessment for corporate (green) bonds by analysing whether the activities or projects that are financed with the bond or loan involve activities we exclude or avoid. For corporate bonds, we assess whether the company has policies in

place for sustainability risks, including integrity-related risks, and check if the company is not listed as an UN Global Compact violator.

Within ASN Bank, the Sustainability team is responsible for assessing counterparties' policies on these topics. In addition, we monitor if companies are involved in ESG-related misconduct, using a data provider (RepRisk). When the company is involved in serious misconduct, we engage with the company to seek further clarification.

Companies approved for ASN Impact Investors' investment universe are also eligible for corporate bond investments. The companies that fall within the investment universe of ASN Impact Investors are assessed in the onboarding process; among others, this review covers aspects such as ethics, strategy and risk management, inclusiveness, transparency and management of conflict of interest.

For green bonds we assess the framework but do not necessarily evaluate the issuer's highest governing body (as is also the case for corporate bonds). Additionally, we always include a second opinion in our assessment. If this opinion contains recommendations, we may verify whether the issuer has addressed them or set their implementation as a condition for investment.

Government bonds and loans

Government bonds and loans must meet our exclusion criteria as described in our specific policy for government bonds. We periodically update the countries that are eligible for our government bond portfolio and analyse whether financial institutions comply with our sustainability policies. We base these criteria on the endorsement of relevant international conventions, through ratification or accession. After, the performance of non-excluded countries is assessed based on a number of relevant indexes, as democracy, LGBTIQ+ rights, level of corruption, forced labour, protected areas of nature, etc. In this way, considerations of ethics, strategy and risk management, inclusiveness, transparency and management of conflict of interest are taken into account in the assessment of the counterparty. Internal communication on critical concerns is not considered at the moment. In consequence, we select countries that meet the exclusion criteria based on sustainability criteria for climate, biodiversity and human rights. Some countries are therefore excluded from our investment portfolio, for instance when they do not actively reduce their impact on climate change.

Sustainable loan portfolio

For project financings in the Sustainable finance portfolio we have developed a tool which is used to determine whether a potential project meets our sustainability criteria or whether extra research is required. Under this portfolio, as we only invest in

Foundation of our policies



CLIMATE

- Paris Agreement
- Intergovernmental Panel on Climate Change (IPCC) of the World Meteorological Organization (WMO)
- United Nations Environment Programme Finance Initiative (UNEP FI)
- Montreal Protocol



BIODIVERSITY

- Convention on Biological Diversity (CBD)
- The Kunming-Montreal Global Biodiversity Framework (GBF)
- Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) report
- Five Freedoms of the Farm Animal Welfare Committee
- Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)
- Convention on Wetlands (also known as the Ramsar Convention)
- UNESCO World Heritage Convention (WHC)



HUMAN RIGHTS

- United Nations' Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- Conventions of the International Labour Organization (ILO)
- Guidelines of the Organisation for Economic Co-operation and Development (OECD) for MNE
- UN Global Compact
- Conventions in relation to weapons



projects within the Netherlands or North-West Europe, local legislation is considered sufficient as governance screening criteria. Since early 2025, we have suspended new sustainable finance loan origination, while reviewing our strategy and focus in this area. We are currently investigating whether and in what form the portfolio can possibly grow again in the future.

SME customers

We do not assess our SME customers on specific governance aspects, since these criteria are considered disproportionate for this customer group. But we do exclude certain businesses. We base that on SBI-codes/ their core business. For example, we exclude business in the fossil fuel sector.

Residential mortgage portfolio

It is important that the collateral of our mortgage portfolio becomes more energy efficient. In our ESG transition plan we describe our ambitions and actions to further improve the energy efficiency of our residential mortgage portfolio. In our mortgage products, we do not exclude (potential) homeowners with low energy efficiency ratings. However, we do proactively engage with our customers by offering products and services aimed at home energy efficiency improvement.

Monitoring sustainability matters of companies we invest in or finance

We have continuous monitoring and periodic assessments in place to ensure that our current and potential investments and loans remain within the limits of our sustainability criteria. We also monitor and actively engage with companies in case of observed controversies or misconduct. In case of serious misconduct, we approach the relevant stakeholder and engage in a conversation to set up a request for action. If the stakeholder cannot uphold this request, we may decide to withdraw as an investor or financier.

Strategy, business model and value chain

During 2025, we concluded the execution of our strategy 2021-2025: 'Better for each other – from promise to impact'. This strategy had two main pillars aimed at strengthening our distinctive capabilities: to be the bank with the strongest customer relationship and to have a substantial and measurable positive impact on society. While significant progress was made in realising the core ambitions of the 2021-2025 strategy, economic circumstances and customer needs continued to evolve. This prompted the development of a new strategy with a strong focus on simplification and growth.

On 13 November 2025, we announced our new strategy 'Simplify and Grow'. We aim to achieve growth through our core activities: mortgages, savings, and payments, and enhance the effectiveness and efficiency of business operations, internal processes, and systems. Building on the strong ASN Bank brand and our distinctive social profile, the new strategy sets out three priorities:

1. Grow our business
2. Increase sustainable and social impact
3. Simplify the way we operate

Further information about the new strategy and our transformation can be found in the Section Our strategy of the Annual Report. Our value creation model, visualises how we create long-term value for our stakeholders, see the sections How we create value and Company profile of the Annual Report. And for more information about current and anticipated effects and adjustments to our strategy and our business model that may impact the relationship and how we deal with our interests and vision of our stakeholders, please refer to the sections Transformation programme and Our stakeholders, both of the Annual Report.

ASN Bank remains committed to contributing to a sustainable and fair future for everyone. We help customers improve their homes' energy efficiency and explore new investment opportunities that support the energy transition and sustainable economy through financial solutions. This also contributes to the resilience of ASN Bank against sustainability-related transition and physical risks. For more information regarding these topics, see the sections [Sustainability governance](#), [Sustainability risk](#), and Double Materiality Assesment in the Annual Report 2025.

During 2025, we concluded the execution of our strategy 2021-2025 related ESG targets which are disclosed in the table below. These applied to the bank until the announcement of the new strategy in November 2025. This is the last time we will report on these topics in this way in our sustainability statements.

ESG metrics and targets 2021-2025		
Definition	Target	More in the Annual Report, Section
Net zero	Net zero by 2050	Climate change
Employee engagement	≥ 8.0 in 2025	Own workforce
Net Promoter Score	+7 in 2025	Customer relationship
Number of active multi-customers	1.3 million in 2025	Customer relationship

Our new strategy, with focus on simplification and growth, includes the non-financial targets as disclosed in the table below. From the reporting year 2026 onwards, the new metrics will be fully integrated into the sustainability statements.

ESG metrics and targets 'Simplify and Grow'

Definition	Target	More in the Annual Report, Section
Employee engagement	≥ 8.0	Own workforce
Net Promoter Score	Leading position	Customer relationship
Number of primary customers	> 1.5 million	Customer relationship

Strategy development process

ASN Bank conducts a strategy review on an annual basis to assess, adjust and reconfirm long-term targets and strategic decisions based on internal and external factors, market developments (such as capital market changes, customer demand, and crisis impacts) and stakeholder interests. The process is continuously evaluated and updated short-term (1 year) when needed. Key inputs include the double materiality assessment (DMA), Strategic Risk Assessment (SRA) (covering climate and environmental risks), ESG assessments, risk appetite statements, financial business reports, sustainability scenarios, stakeholder consultations and stress tests. The annual SRA is crucial for recalibrating strategy against internal and external trends, including ESG risk developments.

KPI and target adjustments are aimed at strengthening stakeholder relationships, transparency, responsiveness, interest alignment and resilience of the bank. Adjustments stem from reassessing strengths and weaknesses along with opportunities, impacts and risks, as well as strategic goals and business model implications. This enables the bank to become more efficient and adaptable to regulatory requirements, technological developments, economic shifts, evolving customer needs and physical environmental changes. Our findings are detailed in our DMA Section of the Annual Report and the respective corresponding chapters. For more information see the sections Double materiality assessment, Climate change, Own workforce, Customer relationship and Anti-financial crime of the Annual Report.

ASN Bank aims to have a strategy and business model that is sustainable from a long-term perspective and is focused on achieving our strategic goals. To monitor progress and gain insight into the key challenges and solutions related to our strategy's ESG objectives, we have established short-, medium-, and long-term targets supported by performance indicators.

In 2025, ASN Bank has been working on revising the Net zero transition plan and we continue to work on a holistic [ESG transition plan](#), which is guided by the regulatory requirements and recommendations of the EBA as well as the provisions of CRD VI. The transition plan serves as a strategic guide for ASN Bank to systematically manage the shift towards a more sustainable business and investment practice. The

plan defines the necessary measures, timelines, and responsibilities to transparently manage ESG risks across the bank's lending and investment portfolios, thereby ensuring the long-term sustainability of its business model.

Sustainability risk

Sustainability risk is one of ASN Bank's strategic risks and is part of the bank's risk taxonomy as a stand-alone risk type. This categorisation supports the bank's aim of developing a holistic approach to the incorporation of ESG risk drivers into its overall business strategy, governance, risk management framework, organisational structure and reporting.

We define sustainability risk as the risk arising from Environmental, Social or Governance-related (ESG) factors over the short, medium or long-term that may have an (in)direct financial or reputational impact on ASN Bank - either directly or by acting as a driver for other risk types. In addition, the risk arising from the value chain of ASN Bank which may have an (in)direct negative impact on the environment or society.



As shown in the figure, we divide sustainability risk into sub-risk types and define them as follows.

Environmental risk

Environmental risk is the risk of (in)direct financial or reputational damage to the bank due to acute or chronic physical environmental events or the role in the transition to an environmentally sustainable economy of the bank itself or of parties with which the bank may interact. In addition, the risk arising from the value chain of ASN Bank which may have a (in)direct negative impact on the environment.

Social risk

Social risk is the risk of (in)direct financial or reputational damage to the bank due to social events or the role in the transition to a social sustainable economy of the bank itself or by parties with which the bank may interact. In addition, the risk arising from

the value chain of ASN Bank, that may have a negative impact on social topics such as human rights and privacy.

Governance risk

Governance risk is the risk of (in)direct financial or reputational damage to the bank due to governance-related events or the role in the transition to a sustainable economy. In addition, the risk arising from the value chain of ASN Bank, which may have a negative impact on environment or society due to inadequate corporate governance, ethical management or transparency.

Sustainability risk management refers to the management of all risk drivers that may affect our risk profile, or the environment or society. In this respect, sustainability risk management concerns the control of outside-in risks and the risks arising from negative inside-out impacts.

Risk profile

ASN Bank has a low appetite for sustainability risk, our risk profile is mainly driven by the bank's business model and strategy. Being a retail bank with a high concentration of residential mortgage loans in the Netherlands, the risk profile is impacted as follows:

- Physical risk: The intensity and frequency of wet and at the same time longer dry periods are increasing and homes will consequently be impacted by the deterioration of foundations and soil. We closely monitor these developments.
- Transition risk: The exposure to transition risk largely depends on the transition to a more sustainable housing sector. We actively encourage and support customers to reduce their energy costs by making their home more sustainable.

The figure 'Geographical distribution of mortgage portfolio and related climate risk' shows our mortgage portfolio by province and the share of mortgages that is sensitive to climate change events by province, which indicates potential climate change physical risks. To assess which exposures within our mortgage portfolio are sensitive to climate change events, we consulted the data from the Dutch Climate Impact Atlas (*Klimaat-effectatlas*), an initiative of the Dutch government. All maps in the atlas are available at the level of the collateral's coordinates.

We mapped the coordinates of the underlying collateral in our database to the coordinates of the maps in the atlas, irrespective of the (loan) portfolio. Exposures considered as sensitive to climate change events:

- Regions with a high or very high-risk exposure to pole rot and/or soil subsidence according to the maps in the Climate Impact Atlas, with the scenario 2050 Low.
- Regions with a flood of 50 cm or higher and a probability of 1/300 and higher according to the maps of the Climate Impact Atlas, with 2050 as reference point.

Geographical distribution of mortgage portfolio and related climate risk



Management and control

Clear roles and responsibilities are preconditions for an effective risk governance framework. To manage sustainability risk appropriately, ASN Bank has implemented the three lines model.

Integration of ESG risks in the risk framework

A sustainability risk management framework is in place, covering:

- A sustainability risk management policy which describes the way ASN Bank complies with all ESG-relevant laws and regulations, establishes a Sustainability risk management framework and defines the mandatory requirements for managing Sustainability risks within the Bank.
- A procedure and guidance document on how to conduct the ESG risk materiality assessment. It defines the methodology to systematically identify, evaluate, and mitigate sustainability risks. The requirements set out in the procedure are based upon the ECB Guide on CER, EBA Guidelines on ESG Risk Management and the European Sustainability Reporting Standards.
- A Risk Appetite Statement (RAS) which includes a paragraph on the KRIs set for Sustainability risk.

The risk management cycle is the basis for identifying, assessing, prioritising and monitoring risks and their financial impact. There is a transmission channel in place that translates ESG risk drivers to the risk types included in the ASN Bank risk taxonomy.

To monitor sustainability risk, we have developed sustainability key risk indicators (KRIs) with the corresponding thresholds. Since sustainability risk is considered both a stand-alone risk type and a risk driver for other risk types within the risk framework of ASN Bank, specific sustainability key risk indicators (KRIs) are included in the RAS for sustainability risk. For ESG risks that are translated into other risk types, for instance credit risk and reputational risk, KRIs are included in the respective RAS. There are also KRIs not specific to sustainability risk, but which do include the impact of sustainability as a risk driver. For example, the KRI regarding compliance with prudential laws and regulations includes ESG regulations. The determination of the indicators and the associated thresholds is an annual process and is approved by the ExBo.

The KRIs are monitored and steered upon, for instance if a main KRI breaches the thresholds a path-to-green is required. ASN Bank has monthly and quarterly risk reports on the progress of the KRIs, see the Section [Sustainability governance](#) for more information.

The table below gives an overview of the 2025 KRIs. The outcomes of the ESG risk materiality assessment of 2025, which are input for the RAS-process, will be reflected in the KRIs set for 2026.

Sustainability risk indicators		
Risk Appetite Statement	Risk indicator	Quantitative threshold
Sustainability risk – environmental risk	Growth of ASN Bank’s Sustainable Finance portfolio - monitors the expected total volume of CO ₂ e compensated by sustainable projects financed	Yes
	Average energy efficiency rating of the residential mortgage portfolio - monitored in kWh/m ²	Yes
Credit risk – environmental risk	Share of customers classified as high sustainability risk regarding drought	Yes
	Share of customers classified as high sustainability risk regarding flooding	Yes
Sustainability risk – social risk	Percentage of IT contracts for which the production location is known	Yes
Compliance risk – governance risk	Conduct: number of observed incidents with employees	Yes
	Privacy: non-compliance with GDPR	Yes
Reputational risk – E, S, G risks	A significant deterioration of the RepTrak – ESG score ¹ as opposed to the previous quarter and/or a lasting negative deviation from the long-term average	No

1. The RepTrak – ESG score is calculated through an assessment of what stakeholders think of the bank, specifically in relation to ESG, by means of nine indicators (three for Environmental, three for Social and three for Governance).

The main KRIs for sustainability risk are included in the monthly integrated risk report. This report is discussed monthly within the ExBo and quarterly with the Risk & Compliance Committee. All risk committees receive a quarterly risk report, which includes the KRIs that apply to their domain. For Sustainability risk, the ESG Impact Committee (ESG IC) receives a quarterly report. The quarterly report is also submitted to the ExBo and ESG Committee of the Supervisory Board.

Areas of focus and activities

ESG risk materiality assessment

ASN Bank conducts an annual ESG risk materiality assessment that reveals institution-specific ESG risks, considering the specificities of the business model, operating environment and risk profile. Its primary objective is to identify material risks arising from ESG risk drivers. The scope of this assessment encompasses aspects of our own business operations as well as of the upstream and downstream value chain, i.e. all ASN Bank's activities, including all underlying legal entities, departments and portfolios.

In assessing ESG risks, important considerations are ASN Bank's business model, products and services, geographical coverage and customers. ASN Bank also has risk assessment tools in place for other risk types (see previous paragraphs on other risk types) and the risks related to the various risk types are taken into account for decision-making. There is always a rationale behind prioritising risks.

In the identification and assessment process of ASN Bank's ESG risks drivers, we identified and assessed ESG events, including climate-related hazards and transition events to determine whether and how our assets and business activities are exposed to events. The following time horizons are considered:

- Short-term (< 1 year)
- Medium-term (1 –5 years)
- Long-term (> 5 years, including a time horizon of at least 10 years)

The time horizons are aligned with the expected lifetime of our assets, strategic planning and capital allocation plans. As such, the medium-term time horizon (1-5 years) is in line with the (annual) business planning cycle and capital stress testing horizons of three years. The long-term time horizon is beyond five years due to the long-term nature of our assets: residential mortgages have an average maturity of around eight years. Our GHG emission reduction targets (SBTs) are also aligned with the long-term time horizon.

The ESG risk materiality assessment process started with a long list of potential material ESG topics. The following information feeds into the longlist:

- Climate-related hazards,
- Topics included in the European Sustainability Reporting Standards (ESRS),
- Physical risks included in the European Climate Adaptation Platform, Climate-ADAPT,
- Expert insights, and
- Other available information.

A panel of experts, comprising of first and second line staff members across the business units and business lines, assessed the longlist on relevance and possible material impact. This resulted in a shortlist of ESG topics.

The likelihood and financial impact of the short list risk drivers are assessed for all the portfolios of ASN Bank. Thresholds for financial impact are defined as:

- Percentage of portfolio
- The amount of expected loss
- Loss amount (for operational events)

Available data (internal and external) is a limitation to conducting a full quantitative assessment. Hence, the assessment is enhanced with a qualitative assessment by all relevant stakeholders/participants.

To assess our own business operations to climate risk, we conducted a Location Impact Assessment for two data centres, the head office vicinity and IT office. The following risk drivers are considered: floods, wildfires, (urban) heat islands, pole rot and subsidence on a scale of none, very small, small, medium, medium-high and high. This location assessment was conducted in Q3 of 2024, and served as input for the ESG RMA of 2025. To assess our mortgage portfolio to climate risk, we plotted the property locations by means of the Climate Impact Atlas.

We identified and assessed transition events in each time horizon to determine whether and how our assets and business activities are exposed to these events. In the ESG risk assessment, the transition events from the ESRS were considered to determine whether they were relevant to ASN Bank, enriched with expert insights and other available information. We did not consider the climate-related scenario analysis consistent with the Paris Agreement. Instead, we considered high-emission climate scenarios, such as the high scenario of KNMI'14, which is in line with the IPCC SSP5 8.5 pathway (4 degree Celsius warming by 2100).

We identified which assets are compatible with the transition to a climate-neutral economy according to the requirements for EU Taxonomy alignment under Commission Delegated Regulation (EU) 2021/2139. The residential mortgage category is the largest on the balance sheet. For that part of the mortgage portfolio that is not Taxonomy aligned, we recognise that a significant effort is needed, we aim to enthruse homeowners to make their home more sustainable.

In 2025, we continued to improve our ESG risk materiality assessment. We paid special attention to the quantification of the ESG risks with data, when available. We analysed our own operations and assets on the balance sheet, including our residential

mortgage and SME portfolio, liquidity portfolio and sustainable finance projects, and assessed the ESG risks related to those portfolios.

Results

ESG materiality assessment												
Type	Environmental risk	Risk type	Description	Portfolio					Time horizon ¹			
				Residential mortgages	SME loans	Sustainable financeloans	Financial Markets loans	Own operations	Short-term	Medium-term	Long-term	
Environmental risk - Physical risk	Pole rot following drought	Credit risk	Pole rot occurs when wooden poles under a foundation decay due to severe drought, harming the house's foundation. This can reduce collateral value (increasing LGD) and burden borrowers with repair costs, potentially lowering repayment ability and raising probability of default (PD).	•						•	•	•
	Subsidence following drought	Credit risk	Differential settlement occurs when buildings sink unevenly on non-uniformly compacted soil, potentially reducing collateral value (increasing LGD) and burdening borrowers with repair costs that may impair repayment ability and raise probability of default (PD).	•						•	•	•
	Flood	Credit risk and operational risk	Flood damage risk (coastal, fluvial, groundwater, pluvial) can increase LGD through property devaluation and increase of PD via repair costs and higher insurance premiums. Operational risks include potential impact to the Zwolle datacenter.	•		•			•	•	•	•
Environmental risk - Transition risk	Legal and regulatory changes - GHG emissions	Credit risk and compliance risk	Strict requirements regarding energy labels may reduce collateral values and increase LGD, while adaptation costs strain borrowers' repayment capacity. Operationally, the bank may face challenges with suppliers unable or unwilling to meet sustainability reporting requirements	•					•	•	•	•
	Greenwashing ²	Compliance risk and reputational risk	With an ESG Strategy that needs to be further operationalised and evolving regulations, ASN Bank faces challenges that may lead to compliance, and eventually, reputational risk.						•	•	•	•
Social Risk	Working conditions (own workforce) ²	People risk	The transformation of ASN Bank may impact the working environment as the associated unclarity of roles and responsibilities and potential increased work-related stress could lead to higher sickness rate, lower productivity, resignation of key persons and/or insufficient inflow of capable staff.						•	•	•	•
	Data & Privacy ² 1. Data breach 2. Cyber security 3. Data gaps 4. Data ethics	Operational risk and reputational risk	Data breaches and cybersecurity threats pose significant risks through unauthorised access and data compromise, potentially causing privacy violations and reputational damage. Poor data quality and unethical data practices can lead to operational failures, discriminatory outcomes, and regulatory penalties, ultimately resulting in financial losses and damaged customer relationships.						•	•	•	•
Governance risk	Financial crime ²	Compliance risk, legal risk and reputational risk	Financial crime risk represents potential losses from illegal activities utilising financial systems, including fraud, money laundering, terrorist financing, and corruption, with impacts across individual, business, and global economic levels.						•	•	•	•

1. Time horizons as determined during the workshops in May 2025. The quantitative assessment was focused on the long term only.

2. This ESG Risk was not assessed per portfolio but is included in own operations.

The results of the 2025 ESG risk materiality assessment are presented in the table above. We assessed the impact of sustainability risk as a material risk driver for the following risk types: credit risk, reputational risk, operational risk (people risk and legal risk are sub-risk types of operational risk) and compliance risk. The assessment is based partly on qualitative judgements, internal and external studies and the impact of upcoming regulations, and partly on quantitative information (where possible).

We conclude that for the following other financial risk types, the climate-related and environmental (C&E) risk drivers are not material:

- Liquidity risk: C&E risks potentially have a long-term impact and arise from the securitised portfolio. In the short term, they are not considered material.
- Credit spread and interest rate risk in the banking book: we did not identify any material C&E risk drivers. We developed a quantification method to enrich the analysis for credit spread risk.
- Market risk: for the trading book portfolio, we applied the concept of proportionality. This means that, due to the relatively small risk exposures of our trading book portfolio, we did not consider any risk quantification methods.

These assessment results were then used to formulate mitigating actions. We will continue to improve our ESG risk management. The outcomes of the ESG risk materiality assessment of 2025, which are input for the RAS-process, will be reflected in the KRIs set for 2026.

Efforts to improve data availability, quality and accuracy

As the integration of ESG risk in risk management framework is constantly evolving, we continue to analyse the data requirements and the availability of data sources for risk assessments and processes. The data and methodologies of the Dutch Climate Impact Atlas (*Klimaat-effectatlas*) are currently used to measure the physical risks in our residential mortgage portfolio. To improve data quality and accuracy on foundation related risks, in 2026 a pilot with external data sources for example the Dutch Knowledge Center for Handling of Foundation Problems (KCAF) and/or FunderMaps will be conducted to determine whether an alternative source can provide us with more accurate data. To manage transition risks, we retrieve information on energy labels from the Netherlands Enterprise Agency (RVO). In 2025, ASN Bank conducted two pilot projects aimed at improving data on expired or missing energy labels for residential mortgages. The insights gained during these pilots contribute towards data improvement initiatives and underscore the importance of robust quality controls when applying new technologies.

Economic Capital

Sustainability risk is part of the Economic Capital (EC) model. Quantification methods and risk appetite thresholds are in place to ensure adequate capital allocation for sustainability risks.

The EC quantification for Sustainability Risk focuses on physical environmental risks that could damage collateral in the residential real estate mortgage portfolio, specifically flooding and drought-related risks. Flooding probability data is mapped to ASN Bank's mortgage portfolio to calculate average collateral damage based on flooding severity levels. These damages are translated into three distinct Downturn Loss Given Default (DT LGD) scaling factors corresponding to different flooding levels, which are then used to calculate unexpected losses. Drought-related damages follow a similar methodology but utilise a single DT LGD scaling factor to determine unexpected losses. The combined unexpected losses from both flooding and drought risks constitute the base EC for Sustainability Risk. Below we explain how data from the Dutch Climate Impact Atlas (*Klimaat-effectatlas*) is used to calculate EC.

Flood

To assess the exposure of the bank's mortgage portfolio to flood risk for EC, the geographic distribution of the mortgage portfolio is mapped to the location-specific probabilities of three different flood depths (>20 cm, >50 cm and >200 cm) occurring by 2050. In our model to calculate economic capital for sustainability risk, the probabilities of flooding are classified into different risk categories. We also make a prudent choice by defining a cut-off at the flooding probability levels of exceeding 1/3,000, for which economic capital is calculated, so as to correspond to the Economic Capital confidence level (1/1,000) as much as possible with the available Dutch Climate Impact Atlas (*Klimaat-effectatlas*) data.

Risk of flooding in 2050

Probability	Annual likelihood
High probability	>1/30 per year
Moderate-to-high probability	1/300 to 1/30 per year
Low probability	1/3,000 to 1/300 per year
Very low probability	1/30,000 to 1/3,000 per year
Extremely low probability	<1/30,000 per year

Drought

Drought risk encompasses two primary components: differential settlement (the uneven sinking or settling of different parts of a structure's foundation) and pole rot foundation risk. In the context of EC, drought-related foundation vulnerabilities are measured using the 2050 High scenario from the Dutch Climate Impact Atlas (*Klimaat-effectatlas*) for both risk types. Both differential settlement and pole rot risks are categorised into five risk buckets according to their respective measurement scales. Rank 1 represents a very low probability of drought-affected foundation damage, while rank 5 indicates a very high probability. For prudence, the higher rank of the two primary components is used. For EC calculations, only collateral with risk ranks 3 to 5 are considered.

Risk of drought in 2050

Probability	Risk rank
Very high probability	Rank 5
High probability	Rank 4
Moderate probability	Rank 3
Low probability	Rank 2
Very low probability	Rank 1

Stress testing and scenario analysis

Stress testing and scenario analysis offer valuable insights for strategic choices and capital planning. As part of our ICAAP and the Single Supervisory Mechanism (SSM) EU-wide stress testing exercise, ASN Bank conducts capital stress tests that comprise material risks expected to negatively affect capitalisation over the short, medium and long-terms.

For capital planning, we assess our capital adequacy under a credible baseline scenario and specific adverse scenarios. The stress test scenarios may include among others macroeconomic risks, cyber risk, and climate risk. For physical climate risks, ASN Bank uses scenarios aligned with scientific climate change pathways, sourcing flood and drought data from the Dutch Climate Impact Atlas (*Klimaat-effectatlas*) for property damage amounts. The bank considers how climate-related and environmental risks could evolve under various scenarios, recognising that these risks are not fully reflected in historical data.

In accordance with the ECB Guide with respect to ICAAP, the normative perspective for capital stress testing covers a four-year forward-looking horizon. ASN Bank takes

developments beyond this horizon into account in its strategic planning if they are expected to have a material impact. To capture the interaction of various types of risk, the bank uses a holistic capital stress testing framework, incorporating climate-related risks.

The SSM EU-wide stress testing exercise, the ICAAP stress test and mid-year stress test included scenarios with severe stress. Based on the results, we concluded that ASN Bank's capital position is resilient and can withstand severe climate stress.

The mid-year capital stress test outcomes are submitted to and discussed in the Asset and Liability Committee (ALCO) and the Credit Committee. The ICAAP and SSM stress test results are also on the agenda of the Executive Board (ExBo) and Supervisory Board (SB). Further, the outcomes are used to calibrate Risk Appetite Statement (RAS) thresholds for capital adequacy.

Liquidity Risk (ILAAP)

ASN Bank analysed the possible impact of ESG developments on all material risk types. It was concluded that the relevant ESG elements are included in the current liquidity stress testing framework and scenarios. Moreover, the impact of ESG risks on liquidity are expected to materialise on the medium to long run (>1 year). While their impact may rise over time, acute events are not expected to exceed current short-term stress impact. These risks are thus outside the scope of liquidity stress testing, which is and should remain focused on the short-term given the mostly short-term nature of liquidity risk.

Resilience analysis

The outcomes of the ESG risk materiality assessment, stress testing and scenario analysis help us assess the resilience of our business model and strategy in relation to material risks in 2025. The annual Strategic Risk Assessment (SRA) is an important tool to recalibrate the strategy against internal and external trends, including important developments in ESG risks. The outcomes of the ESG risk materiality assessment, stress testing and SRA may result in adjustments to our strategy and business model for the short, medium or long-term in the following areas:

- securing ongoing access to finance at an affordable cost of capital
- the ability to redeploy, upgrade or decommission existing assets
- shifting the products and services portfolio
- reskilling the workforce

There are several areas of uncertainty in the analyses, as the development of ESG risk drivers depends on various uncertain factors that may materialise in different time frames. Our assets and business activities at risk are assessed within the

definition of our strategy (through the SRA), within our investment decisions (through our sustainability policies) and within current and planned mitigating actions (through our ESG risk materiality assessment). Although we see some material physical and transitional risks, we expect that our strategy and business model are resilient in the short, medium and long-terms in relation to climate change. We reached this conclusion based on the results of the ESG risk materiality assessment, stress testing and scenario analysis and the SRA. We did not exclude any identified material physical and transition risks from the assessment.

The periodic update of the macroeconomic scenarios takes the impact of ESG events into consideration, including the transition to a lower carbon and resilient economy such as energy prices and net congestion, on macroeconomic levels. In 2026 ASN Bank will conduct an Environmental Resilience Analysis in accordance with the EBA Guidelines on ESG scenario analysis.

Mitigating risk controls

Material risks stemming from ESG events or climate-related hazards are evaluated on existing effective risk control mechanisms. If considered necessary additional risk responses are developed. Below are some examples of mitigating controls and commitments included in the 2025 ESG risk materiality assessment:

- The existing controls for the risk of Greenwashing, which can result in compliance risk and reputational risk, are 1) the product approval and review process which contains sustainability criteria; 2) content creation process during which amongst others sustainability claims are assessed; 3) and the process in which the feasibility of compliance to sustainability covenants and commitments are assessed.
- The mitigating measures for anti-financial crime, possibly leading to compliance risk, legal risk and reputational risk. Multiple programmes and enhanced resource allocation are in place to remediate shortcomings that were identified in 2023. ASN Bank is executing a multi-year Remediation Programme to ensure adequate control and demonstrable management of AFC risks.
- For people risk, we actively monitor retention rates and focus on positioning ASN Bank as an employer of choice. Supporting employee wellbeing also remains a priority through our 'Vitaal & Gezond' platform.
- Data & privacy, possibly leading to operational risk and reputational risk. ASN Bank invests in employee awareness as our human firewall through continuous programmes and also provides training to employees on privacy.

Additionally, ASN Bank has sustainability policies which also act as an important mitigant of our exposure to outside-in ESG risk drivers and risk arising from negative inside-out impacts, see the Section [Sustainability policies](#).

ESG integration in credit risk

ASN Bank has integrated ESG-risks throughout its credit process, from initial due diligence to ongoing monitoring, ensuring that climate and environmental risks are assessed, managed and aligned with our overarching strategy and risk appetite. Some key ESG-risk management measures and commitments relating to credit risk are:

- Portfolio-specific approaches with tailored ESG considerations for residential mortgages, commercial real estate, SME loans, Financial Markets & Treasury and sustainable finance projects
- Comprehensive due diligence assessing both physical risks (drought, foundation issues) and transition risks (energy efficiency)
- Sustainability policies applied to sectors and counterparties, with regular policy updates
- Advanced risk classification system using segmentation matrices that combine climate risk scores with financial resilience metrics
- Incentivised pricing mechanisms including interest rate discounts for energy-efficient properties (*Bespaarhypotheek*) and lower return targets for sustainable projects (4% for sustainable projects vs 8% bank-wide target)
- Continuous monitoring systems utilising dashboards and key risk indicators to track geographic and sectoral risk concentrations throughout loan lifecycles

ESG-risk is incorporated in the Risk Appetite of credit risk to enable strategic steering towards a sustainable portfolio.

Climate change impacts, actions, metrics and targets

In addition to the disclosures on risks and risk management in the previous sections, the following information is provided to meet expectation 13.4 of the ECB Guide on climate-related and environmental risks.

Introduction

In response to the 2015 Paris Agreement, the Dutch financial sector committed itself to the National Climate Agreement of the Netherlands (*het Klimaatakkoord*). In 2019, ASN Bank (at the time de Volksbank) endorsed the Financial Sector Climate Commitment. Following up on the commitment, ASN Bank published its Climate Action Plan in 2022, stating the ambition to reach net zero emissions by 2050. To support our 2050 ambition ASN Bank has near-term Science Based Targets (SBTs) validated by the Science Based Targets initiative since November 2022. Since then, we moved beyond the Climate Action Plan and are developing a holistic ESG transition plan to support our impact ambitions and ensure resilience to ESG risks.

Impacts, risks and opportunities

Through our own operations, investments and financing activities, we emit greenhouse gases into the atmosphere, contributing to climate change and impacting nature. This negative impact on the environment is considered a material impact in our double materiality assessment (DMA). In our DMA we also concluded that there are material climate and environmental risks.

Negative impact

To identify and assess our environmental impact, we measure, report and set targets. In 2025, our total scope 1, 2 and 3 emissions were 1,376 ktCO₂e, excluding scope 3 emissions from our assets under management activities. For more details about our emissions and GHG protocol, see the Section [Gross scope 1, 2, 3 and Total GHG emissions](#).

The impact from our business operations on the environment is limited at 2% of our total emissions. Business travel, commuting, heating and IT hardware and software contribute the most to our business operations emissions. Since our branch offices and shops are now independent franchises, we disclose their emissions separately.

The remaining 98% of emissions occur in our value chain through our business relationships, specifically from our investments and financing activities. Our sovereign bond and mortgage portfolio of residential and commercial real estate, especially properties with a low energy efficiency rating contribute the most to the negative impact.

Positive impact

ASN Bank makes a positive contribution to climate change mitigation through investments in renewable energy projects and projects that accelerate the energy transition, like energy storage. We are committed to only finance renewable forms of energy through the Science Based Targets initiative (SBTi). This is an integral part of our strategy and commitment to the Financial Sector Climate Commitment.

By supporting our mortgage customers with banking and non-banking products, we have an indirect positive impact as well, either via our own banking products or through products and services from partners. With our nature inclusive mortgage, we offer mortgage products for renovations that stimulate energy efficiency, climate adaptivity and nature inclusiveness. Doing so we encourage our customers to make their homes more sustainable and improve living comfort.

We participate in various working groups to co-create uniform sustainability definitions, methodologies and reporting methods for the financial sector. This resulted, among other things, in the development of the Partnership for Carbon Accounting Financials (PCAF), of which we are co-initiators. The PCAF developed an internationally recognised method to measure and monitor the financed emissions of loans and investments. Other initiatives in which we participate include the Partnership for Biodiversity Accounting Financials (PBAF), and the Energy Efficient Mortgage NL Hub.

Risks and opportunities

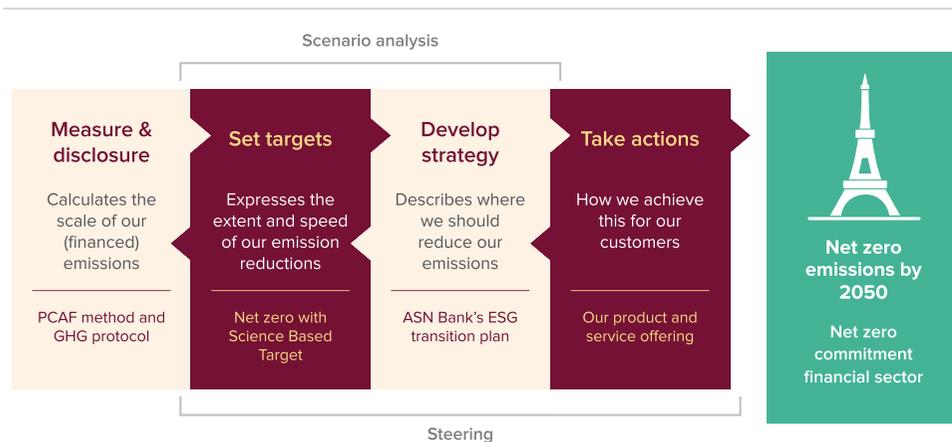
In our DMA we included the risks that were identified in our ESG risk materiality assessment (ESG RMA). In the ESG RMA we considered climate related hazards to identify and assess climate change related physical risks, and we considered transition events to identify and assess transition risk relevant to ASN Bank. In the Section [Sustainability risk](#), we specify the time horizons, likelihood, magnitude and duration of identified hazards, events and risks and we describe the identified material risks and how they interact with our business activities, strategy and investment capacity.

The identified risks could potentially have a financial impact on the bank. To mitigate the potential impact, we have an overlay for ESG risks for our mortgage portfolio. Physical environmental risk associated with i.e. the risk of flood and drought are considered for that overlay, see the Section [Developments per portfolio - Management overlay](#). To calculate the overlay, we used the same scenarios of the Dutch Climate Impact Atlas (*Klimaateffectatlas*) as we did to determine the IROs. We disclose our physical and transition risk in the ESG materiality table in the Section [Areas of focus and activities](#).

We did not identify any material opportunities in the DMA regarding climate change mitigation and adaptation and have therefore not included opportunities in policies, targets, metrics and other analyses.

Transition plan for climate change mitigation

In December 2022, we published our Climate Action Plan (CAP), describing our impact reduction ambitions and possibilities on how to reach them. In 2024, the CAP was succeeded by the Net zero transition plan, specifying our actions and aimed at accelerating our emission reductions. In 2025 we worked on an integrated ESG transition plan expanding the scope to incorporate ESG risks. We have the ambition to finalise the ESG transition plan in 2026. The ESG transition plan serves as a strategic guide for ASN Bank to systematically manage the shift towards a sustainable business and investment practice, given changing prudential circumstances and varying customer behaviour. Below we visualise how our strategy, targets and transition plan relate to each other.



ESG transition plan

ASN Bank's strategy 'Simplify and Grow' sets out three priorities: growth in mortgages, savings and payments; increase sustainable and societal impact, and simpler and faster operations. These priorities define the direction of the ESG transition plan and contribute to a sustainable and fair future for everyone.

Our overarching objective to transition planning is to embed sustainability at the core of our business strategy and risk management, ensuring the bank's activities

are compatible with the transition to net zero and a more sustainable economy. This implies that ASN Bank aims to address ESG risks in the short, medium and long term, in line with the overall business strategy, risk appetite and regulatory requirements. For example, the bank helps customers make their homes more energy efficient. ASN Bank is also looking into whether, in addition to existing impact funds, it can offer more funds that stimulate the energy transition. Or invest in the transition to a more sustainable economy and society through financing.

This high-level objective drives the bank's ESG initiatives and aligns with regulatory expectations, and EU and Dutch policy goals (e.g. the European Climate Law target of net zero by 2050, and interim -55% emissions by 2030). The plan considers the requirements from both the ESRS and CRD, including underlying guidelines and introduces a structured annual ESG transition planning cycle. It covers ASN Bank's own operations and financing activities with emphasis on retail lending.

Furthermore, the new strategy also emphasises the focus on mortgages while 'simpler and faster' acts as a pre-condition and enables ASN Bank to offer sustainable finance solutions to homeowners at an affordable price. To increase our social impact, ASN Bank aspires that products and services offered to clients — from green mortgages to sustainable investment solutions — actively contribute to building a more socially responsible and environmentally sustainable asset portfolio, while driving measurable positive impact for its customers and communities. Regarding our mortgage portfolio, sustainable growth targets will help to transform the traditional mortgage lending operation into a catalyst for sustainable housing transition. In the Section [Strategy, business model and value chain](#) we explain how we operationalise the 'Simplify and Grow' strategy.

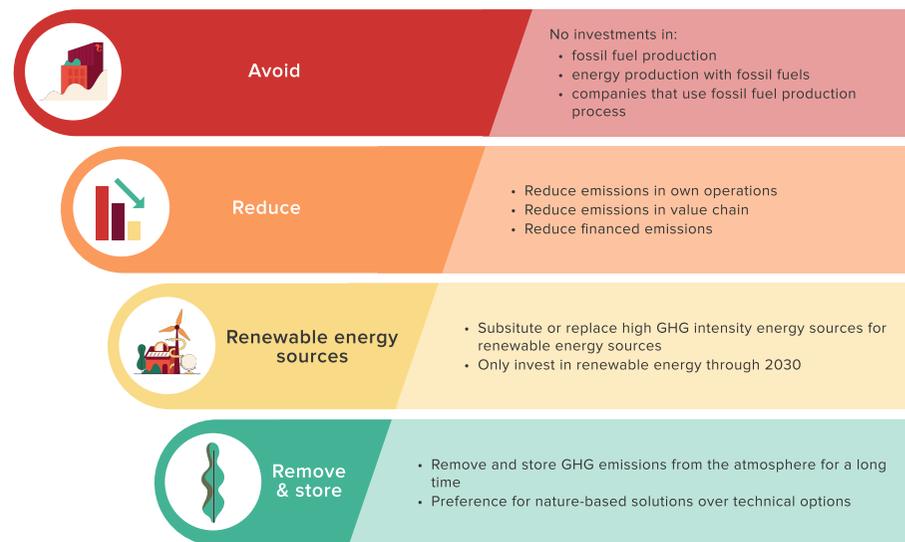
To implement the overarching objective we have defined specific short-term, medium-term, and long-term strategic goals that detail how ESG priorities will be achieved over time. These objectives are aligned with the bank's overall corporate strategy and ensure ESG risks are managed within the risk appetite at each stage. We outline these strategic ESG objectives by time horizon, showing how the bank will progress from immediate integration steps to long-term net zero alignment, while ensuring adequate risk management on ESG risks. With the short-term objectives (2026) we continue to strengthen the foundation for ESG integration across all operations and support the quantification of our decarbonisation levers. Our mid-term ambitions (2027-2030) regard scaling sustainable finance solutions and ensure adequate and proportionate ESG risk management. Achieving net zero alignment and play a leading role in sustainable finance are key in our long-term objectives (2031-2035+).

Our net zero KPI is central in the ESG transition plan. Net zero entails that we have to reduce our emissions from our own operations and the emissions from our investments and financing activities to as close to zero as possible, and neutralise the residual emissions. The ESG transition plan covers relevant activities of the bank: residential mortgages, business mortgages and corporate bonds and also project finance for renewable energy projects. The data and calculation method for determining the progress on the KPI are registered and monitored in automated IT processes. On a quarterly basis ExBo and the ESG Impact Committee (ESG IC) are informed. Every month a performance report is shared with the first line.

ASN Bank has taken important steps to expand ESG related human and financial resources in 2025. Key expertise has been established in climate scenario analysis, portfolio alignment methodologies, ESG data management and risk materiality assessments. We also have enhanced our capabilities to improve the availability, quality, and integration of ESG data across core systems. At the same time, foundational governance structures—such as the ESG Impact Committee, ESG specific RACI allocation, and strengthened first and second-line monitoring responsibilities—are now in place to support implementation. In 2026 ASN Bank will work on further strengthening several areas where upskilling and improved capabilities ought to be required.

Climate change mitigation hierarchy

ASN Bank's climate policy, see the Section [Sustainability policies](#), forms one of the foundation for the ESG transition plan and sets sustainability criteria to inform our lending and investments decisions. The climate policy is accompanied by our risk management policies to manage climate-related financial risks. Finally, the policy explains how different stakeholder groups are consulted and affected. We put our intentions into practice with the Climate change mitigation hierarchy. A tool that sets priorities to reduce our negative impact. The hierarchy is structured as follows:



Policies related to climate change mitigation and adaptation

We have policies in place to manage our impacts, risks and opportunities related to climate change mitigation and adaptation. See the Section [Sustainability policies](#) for more information and how we engage with our stakeholders.

Climate change mitigation and adaptation policy

Our policies describe how we intend to contribute to climate change mitigation and include climate change adaptation measures for our homeowners. We explain how investments in energy efficiency, in the renewable energy transition and other initiatives can improve climate, the environment and nature as a whole.

Of our total emissions (excluding the scope 3 emissions of our asset manager), 35% originate from our loan portfolio from the provision of private and business mortgages. Since we include the emissions of our mortgage portfolio in our GHG inventory, we have developed activities to reduce these emissions. These activities are considered in our ESG transition plan, in which we indicate the actions and financial resources for the coming year.

In our investment policies, see the Section [Sustainability policies](#), we explain our investment criteria to exclude certain investments or to support investments in

combating climate change and the transition towards a sustainable economy. In line with the climate mitigation hierarchy and aligned with our sustainability criteria, we exclude investments in the following three categories:

1. The production of electricity and heat involving high emissions.
The production of electricity and heat based on lignite, coal, shale gas and oil (such as tar sands oil) accounts for the largest share of GHG emissions per unit of energy generated. Although these emissions can be reduced by improving efficiency, we do not consider this sufficient. We do not regard 'clean coal-fired power plants' as a sustainable energy source, not even if the CO₂e is stored in gas fields, for example by Carbon Capture and Storage.
2. Activities that emit high levels of substances during production.
Activities that emit large amounts of greenhouse gases include mining, the extraction and production of lignite, coal, oil (e.g. tar sands oil) and gas (e.g. shale gas), basic chemicals (including petrochemistry), base metals, and cement production.
3. Products that emit high levels of substances during the use phase.
This includes products from transport, agriculture and livestock farming.

Since we avoid heavily polluting sectors, we do not have specific sector targets in our transition plan. We do support investments that contribute to combating climate change and the energy transition. Additionally, we realise that climate change is inevitable and therefore we invest in climate adaptation measures. We offer discounts to homeowners when they want to finance climate adaptive measures, like water retainment and more greenery in their garden.

Every year we provide qualitative and quantitative data to report our progress on the Financial Sector Climate Commitment. ASN Bank cannot be excluded from the EU Paris-aligned benchmarks.

Actions and resources in relation to climate change policies

Throughout 2025, we continued scenario analyses to determine the rate at which we need to reduce our emissions. The ExBo has approved the scenario that is aligned with our science-based targets for 2030. For this analysis we developed an internal tool to assess different scenarios to determine the impact of our actions on the target and target year. A scenario in line with the Paris Agreement and a conservative scenario were considered. The difference between the two scenarios determined the decarbonisation levers and their effectiveness and appropriateness for our financed emissions.

In this respect, we considered a change in emissions related to portfolio growth, autonomous development due to external factors such as policy, legislation and

regulations, as well as market fluctuations. The remaining emissions must be reduced through our products and services.

Decarbonisation levers

Decarbonisation levers are the products, services and other actions that are implemented to reduce emissions and to achieve our climate mitigation goals. To reach net zero emissions by 2050 we are investigating the potential decarbonisation levers for both our banking and non-banking products. For scope 1 and 2 we have quantified our decarbonisation levers, while for our scope 3 categories we have set reduction targets for our most impactful activities, but have yet to quantify the decarbonisation levers. Consequently, for our scope 3 emissions we have not identified dependencies, risk and financial effects for decarbonisation levers.

Decarbonisation levers that address the scope 1 and 2 emission reduction targets include moving to smaller offices with better energy performance in 2026. We estimated in 2024 that moving offices could lead to a scope 1 and scope 2 (location-based) emission reduction of 570 to 700 tCO₂e per year, depending on the amount of floor space we need. In 2025 we reduced our emissions with approximately 125 tCO₂e by moving our offices in 's Hertogenbosch. Moving offices in Utrecht could potentially reduce the emissions with 440 to 560 tCO₂e, aligning with our estimated total reduction.

The 'Simplify and Grow' strategy has reconfirmed our net zero ambitions by 2050 which are supported by our SBTs. In 2026 we are identifying, quantifying and optimising our decarbonisation levers to achieve our GHG emission reduction targets in scope 3. Supported by the climate mitigation hierarchy, as described in the Section [Transition plan for climate change mitigation](#), we have identified various decarbonisation levers.

To reach net zero emissions by 2050 we are investigating the potential decarbonisation levers for both our banking and non-banking products. Costs were included in the Financial Plan & Budget for 2025.

1. Banking products and services to retail customers
We offer several banking products and services that could serve as decarbonisation levers. These products and services either attract new customers with more energy efficient collateral, or help existing customers improve the energy efficiency of their current home. These products and services include: Bespaarhypotheek, an ASN mortgage including a loan component for sustainable housing, a personal loan for sustainability, and advice for sustainable renovation.
2. Non-banking products and services

In November 2025 ASN Bank started a pilot to support customers with improving the energy efficiency of their homes. This pilot will run until December 2026 to investigate which measurements are most effective in actually motivating home owners to take action. Together with partners ASN Bank offers 1,600 existing customers a free energy efficiency rating, including personal advice. With this pilot we aim to gain valuable insights in how to motivate customers to take action, which in turn contributes to our net zero KPI.

3. Removing CO₂e from the atmosphere

For the remaining emissions, such as emissions from generated waste, the last step of the carbon mitigation hierarchy, is to extract those emissions from the atmosphere and store them for a long period of time. We set requirements on CO₂e removal and storage in line with the four principles of carbon dioxide removal as stated in paragraph [Climate change mitigation hierarchy](#).

Resources

In the ESG transition plan, budget is allocated to reduce the CO₂e emissions of our mortgages. We continue to invest in our sustainability strategy and a specialised team to reach our targets. Initially, the budget will be used to improve data quality, develop non-banking products such as energy-saving advice or an insulation voucher, and carry out pilots to gain experience with direct customer approach. The resources are only allocated to the ESG transition plan in order to reduce CO₂e emissions; sustainable financing instruments are excluded from this budget. To determine a precise budget, we are improving our understanding of the effect of the decarbonisation levers.

No significant monetary amounts of CapEx or OpEx were required to implement the actions in 2025. The ESG transition plan is evaluated annually to include changes in data, scenario analysis or organisational changes, to determine what resources are necessary.

Locked-in GHG emissions

Locked-in emissions are the future emissions that are likely to be emitted over the lifetime of the key assets of ASN Bank. Our main assets are residential and business mortgages. As part of our social profile, our policy is to finance homes with the entire range of energy efficiency ratings (A-G), to keep the financing of these homes accessible. We develop products and initiate partnerships on sustainable housing to increase the energy efficiency of these homes, allowing homeowners with a low energy efficiency rating to implement measures to make their home more sustainable. However, we are dependent on homeowners, asset characteristics and external factors, in reducing our mortgage portfolio emissions.

The dependency on homeowners is linked to their willingness and ability to make their homes more sustainable. If they do not want or are not able to make their house more sustainable, the energy efficiency rating of their home and consequently our mortgage portfolio will not improve. For some of our assets, for example monumental real estate, increasing the energy efficiency rating is challenging as options for improvement are limited. Finally, external factors – such as effective government policy implementation, macro-economic development and the high energy prices – play a significant role.

Currently we have not determined the extent to which locked-in GHG emissions are present in the financial assets of ASN Bank. In 2025, we increased our insights to determine the potential locked-in emissions in order to identify potential transition or physical risks. You can read more about our risks in the Section [Sustainability risk](#).

Targets related to climate change mitigation and adaptation

Since climate change is the main driver of our identified climate and environmental physical and transition risks, our efforts to mitigate climate change contribute to the mitigation of these risks. Our net zero KPI is central in the ESG transition plan. Net zero entails that we have to reduce our emissions from our own operations and the emissions from our investments and financing activities by 90%-95% and neutralise the residual emissions. By externally validating our targets via the Science Based Target initiative (SBTi), we take action to mitigate impact and reduce risks.

Since 2015 we have been monitoring our impact on climate change on all our financing activities with the aim at reducing our negative impact. We started with the Climate-neutral balance sheet and now ASN Bank's investment policy and decision-making are aligned with the net zero by 2050 KPI. To identify and assess our climate impacts, we measure, report and set targets for our emissions, aligned with our ESG transition plan.

Net zero KPI

The net zero KPI covers all relevant scope 1, 2 and 3 emissions within our organisational boundaries (own operations, upstream and downstream activities, but excludes our subsidiaries) and does not include greenhouse gas removals. As we do not expect to be able to completely reduce all emissions to zero by 2050, we finance nature-based carbon removal projects, that neutralise our residual emissions. By aligning our business operations and investments with the net zero KPI, we contribute to mitigating our negative impact on the environment.

Science based targets

We have validated Science Based Targets (SBTs) for the emissions of our own operations related to scope 1 and 2 and we have scope 3 category 15 targets for the most relevant loans and investments. This covers 35% of our GHG inventory.

For scope 3 category 1 to 14 we do not have validated targets. The SBTs express which emissions we need to reduce and the required rate to align with the 1.5°C Paris Agreement scenario; see table 'Validated Science Based Targets'. The SBTs contribute to the near-term target, to ensure sufficient progress to stay on track for our net zero KPI and to align our activities with the Paris Agreement. For 2050 we do not have validated targets by the SBTi.

The scope 1 and 2 SBT is aimed at our own operations, where we have direct influence on our car fleet, our energy consumption and our renewable energy contracts, see

the Section [Gross Scope 1, 2, 3 and total GHG emissions](#). We have three SBTs for our scope 3 emissions relating to our investments. The first scope 3 target supports our ambition to contribute positively to climate change mitigation by contributing to the energy transition. The second scope 3 target pertains to the reduction of our mortgage portfolio's emissions. The third commitment reflects our ambition to have a corporate bond portfolio where our counterparties have set SBTi validated targets themselves. The objective is to increase our positive impact by means of motivating our business partners to commit to reduction targets in line with the 1.5°C scenario, which in turn leads to a reduction of the emissions from our portfolio.

Validated science-based targets						
	Base year 2020 value	2024 value	2025 value	2030 target value	% scope/category emissions	% of total emissions
Scope 1 and 2 target: ASN Bank commits to reduce absolute scope 1 and 2 GHG emissions with 45% by 2030 compared to the base year 2020						
Absolute	582.4 tCO ₂ e ¹	498.0 tCO ₂ e ¹	322.1 tCO₂e	320.3 tCO ₂ e ¹		
%	0%	-14%	-45%	-45%	100%	0.02%
Scope 3 target: ASN Bank commits to continue financing only renewable electricity						
%	100%	100%	100%	100%	n.a.	n.a.
Scope 3 target: ASN Bank commits to reduce its mortgage portfolio GHG emissions with 59% per square metre, by 2030 compared to the base year 2020						
Absolute	34.4 kgCO ₂ e/m ²	20.5 kgCO ₂ e/m ²	20.1 kgCO₂e/m²	14.1 kgCO ₂ e/m ²		
%	0%	-40%	-41%	-59%	36%	35%
Scope 3 target: ASN Bank commits to 29% of its corporate bond portfolio by total value held, have set SBTi validated targets by 2025, and 53% by 2030.						
%	5%	39%	55%	53%	n.a.	n.a.

1. Comparative figures updates to align methodology, scope and emissions factors with current reporting year, related to franchises.

The target for the mortgage portfolio is determined with a sectoral decarbonisation approach using the net zero emissions 2050 scenario from the International Energy Agency (2021) as a benchmark. This target is expressed as an intensity metric (kgCO₂e /m²) and is obtained by dividing the total emissions of the mortgage portfolio by the total floor area.

Monitoring impact

In the table 'Financed emission per asset class' an overview is provided of the financed emissions. The table excludes non-financial assets, cash and cash balances at central banks, derivatives and short-term exposures. The emissions of government bonds are not included in the net zero KPI as they fall outside the scope of our validated SBTs. No changes were made to targets and corresponding metrics of the underlying measurement methodologies.

We continuously measure our impact on climate change and we monitor the progress of our portfolio targets on a monthly basis and discuss the progress on a quarterly basis in the ESG Impact Committee (ESG IC), which includes internal stakeholders, like the Marketing & Proposition and Lending.

To monitor the negative impact of our offices and our vehicle fleet, we have set a medium-term target (2030) and a long-term target (2050). If interim targets are not achieved, a proposal for adjustment is drawn up in consultation with internal stakeholders. The proposal is sent to the ESG IC for decision-making.

We periodically reassess our investments to determine whether they are still appropriate and comply with our sustainability policies. See the Section [Sustainability](#)

[policies](#) for more insights in our sustainability criteria and how we engage with our business partners.

Financed emissions per asset class

Asset class	2025 - Financed emissions (Scope 3, category 15) ¹									2024 - Financed emissions (Scope 3, category 15) ²								
	in € millions	Scope 1 emissions (tCO ₂ e)	Scope 2 emissions (tCO ₂ e)	Scope 3 emissions (tCO ₂ e)	Total emissions (tCO₂e)	Of which biogenic emissions	Emission removals (tCO ₂ e)	GHG intensity (tCO ₂ e/ M€)	Data quality score (1 to 5)	in € millions	Scope 1 emissions (tCO ₂ e)	Scope 2 emissions (tCO ₂ e)	Scope 3 emissions (tCO ₂ e)	Total emissions (tCO₂e)	Of which biogenic emissions	Emission removals (tCO ₂ e)	GHG intensity (tCO ₂ e/ M€)	Data quality score (1 to 5)
Business loans	275	6,324	2,092	6,098	14,514	-	-	53	4	341	9,231	3,599	7,125	19,955	-	-	58	4
Unlisted equity	16	2	2	179	183	-	-	11	3	16	1	2	95	98	-	-	6	3
Listed equity	0	0	0	0	0	-	-	731	2	0	0	0	0	0	-	-	660	2
Corporate bonds ³	4,624	24,748	11,194	188,502	224,445	-	-	49	3	4,408	31,196	16,319	199,724	247,240	-	-	56	3
Government bonds ⁴	2,282	276,215	5,972	265,741	547,927	-	-	240	2	2,866	412,113	10,268	335,643	758,024	-	-	264	2
Retail mortgages	57,280	326,357	112,083	-	438,440	-	-	8	3	52,571	322,974	118,324	-	441,298	-	-	8	2
Business mortgages	1,452	31,293	8,217	-	39,510	-	-	27	5	1,388	35,380	9,421	-	44,801	-	-	32	5
Project finance	1,150	81,055	-	-	81,055	7100	-15,097	70	3	1,262	86,065	-	-	86,065	3,555	-	68	3
Total	67,079	745,994	139,560	460,520	1,346,074	7,100	-15,097	20	3	62,852	896,960	157,934	542,588	1,597,482	3,555	-	25	2

1. The reported assets (67,079 EUR millions) in this table do not fully reconcile with the reported value of assets in the financial statements (76,664 EUR millions). This is due to the exclusion of certain asset classes, e.g. non-financial assets, derivatives and cash and balances at central banks and a different calculation methodology in accordance with PCAF 2022.

2. The reported assets (62,852 EUR millions) in this table do not fully reconcile with the reported value of assets in the financial statements (73,680 EUR millions). This is due to the exclusion of certain asset classes, e.g. non-financial assets, derivatives and cash and balances at central banks and a different calculation methodology in accordance with PCAF 2022.

3. Money markets with current year value of 8,956 EUR million (prior year 9,328 EUR million) are out of scope of the net zero KPI due to the short-term nature of the funds and are therefore not seen as causing changes in the real economy.

4. The emissions of government bonds are not included in the net zero KPI.

Energy use

To reach our scope 1 and 2 target, we aim to reduce our energy use in our own operations or to increase our share of renewable energy in our energy consumption. We do this by procuring green energy for entities of which we have operational control.

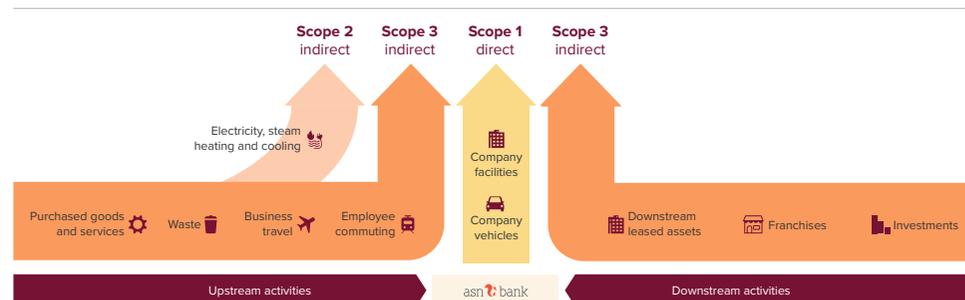
Since branches are now independent franchises, their energy use is no longer included in our energy mix. We have therefore restated the 2024 energy use figure in the table 'Energy consumption and mix'. With the adjusted 2024 figures, the total energy consumption increased by 7%. This is the result of reopening our offices on Friday. The share of renewable energy was stable.

Energy consumption and mix			
	2024 ¹	2025	Δ
Total fossil energy consumption (MWh)	2,709²	2,918	8%
Share of fossil sources in total energy consumption (%)	39%	40%	1%
Consumption from nuclear sources (MWh)	-	-	-
Fuel consumption for renewable sources, including biomass ³	-	-	-
Consumption of purchased or acquired energy (MWh) ⁴	4,186	4,430	6%
The consumption of self-generated non-fuel renewable energy (MWh)	-	-	-
Total renewable energy consumption (MWh)	4,186	4,430	6%
Share of renewable sources in total energy consumption (%)	61%	60%	-1%
Total energy consumption (MWh)	6,895	7,348	7%

1. Comparative figures updates to align methodology, scope and emissions factors with current reporting year, related to franchises.
2. For 2024 we disclose 188 MWh less compared to reporting year 2024. This figure includes actual energy use, whereas figure from previous reporting year reported estimated energy use.
3. Biomass also includes industrial and municipal waste of biologic origin, biogas, renewable hydrogen
4. Energy from electricity, heat, steam, and cooling from renewable sources.

Gross scope 1, 2, 3 and total GHG emissions

The emissions from scope 1, scope 2 and the relevant scope 3 categories are calculated in accordance with the Greenhouse Gas Protocol 'Corporate Value Chain Standard', following the financial control approach to determine which categories and activities are relevant to ASN Bank. In our GHG accounting and reporting, we follow the principles of relevance, completeness, consistency, transparency and accuracy.



We included emissions within our organisational boundaries covering our business operations, upstream and downstream activities, except the investment funds of ASN Impact Investors. apply recognised standards and protocols to measure and report company-wide GHG emissions using an additive approach under operational and financial control. The reporting boundary aligns with the financial reporting boundary, as the group does not exercise operational control over non-consolidated investees. Emissions caused upstream or downstream in our value chain are reported in scope 3 if the emission data is considered sufficiently reliable, influenceable, significant and quantifiable.

Compared to the previous reporting year we included the scope 3 category 14: Franchise emissions. With the transformation independent franchises are now central in our distribution model and data is available and of sufficient quality to make a representative calculation. In previous years, we had included the emissions of 45 shops in our scope 1 and 2. In addition, this is the first year we disclose cloud computing and data centre services separately. To ensure comparability over time, we have calculated the emissions for 2023 and 2024.

Despite the increase in energy use, the emissions in scope 1 and 2 decreased due to lower emission factors. Emissions in category 1: Purchased goods and services have increased significantly. This is partly because some of our suppliers, adhering

Scope 1, 2, 3 and total GHG emissions

	Unit	2023	2024	2025	Δ year to year	2030 target	2050 target
Gross scope 1 GHG emissions							
Scope 1 GHG emissions	tonnes	322 ¹	220 ²	142	-35%	SBTs ³	In scope
Gross scope 2 GHG emissions							
Location-based scope 2 GHG emissions	tonnes	1,889 ⁴	1,564 ⁵	1,508	-4%	n.a.	n.a.
Market-based scope 2 GHG emissions	tonnes	261 ⁶	278 ⁷	180	-35%	SBTs ³	In scope
Gross scope 3 GHG emissions							
Total scope 3 GHG emissions	tonnes	- 1,604,921	1,376,306	1,376,306	-14%	n.a.	n.a.
1. Purchased goods and services	tonnes	3,477	2,829	26,574	839%	n.a.	n.a.
of which cloud computing and data centre services	tonnes	476	540	489	-9%	n.a.	n.a.
5. Waste generated in own operations	tonnes	49	42	15	-64%	n.a.	n.a.
6. Business travel	tonnes	530	477	311	-35%	n.a.	n.a.
7. Employee commuting	tonnes	649	761	666	-12%	n.a.	n.a.
13. Downstream leased assets	tonnes	38	74	30	-59%	n.a.	n.a.
14. Franchises	tonnes	3,532	3,256	2,636	-19%	n.a.	n.a.
15. Investments ⁸	tonnes	- 1,597,483	1,346,074	1,346,074	-16%	SBTs ⁹	In scope
of which biogenic CO ₂ e emissions from biomass projects	tonnes	4,412	3,555	7,100	100%	n.a.	n.a.
Total gross GHG emissions							
Total GHG emissions location-based	tonnes	n.a.	1,607,211	1,377,956	-14%	n.a.	n.a.
Total GHG emissions market-based	tonnes	n.a.	1,605,926	1,376,628	-14%	n.a.	n.a.

1. Revision related to the change of branch offices and shops to franchises with an impact of -49 tCO₂e.
2. Revision related to the change of branch offices and shops to franchises, with an impact of -27 tCO₂e.
3. The target is validated by SBTi and combines scope 1 and 2 GHG emissions.
4. Revision related to the change of branch offices and shops to franchises, with an impact of -390 tCO₂e.
5. Revision related to the change of branch offices and shops to franchises, with an impact of -334 tCO₂e. And a revision of -17 tCO₂e. related to data quality improvement from estimated to actual energy consumption data.
6. Revision related to the change of branch offices and shops to franchises, with an impact of -101 tCO₂e.
7. Revision related to the change of branch offices and shops to franchises, with an impact of -89 tCO₂e. And a revision of -24 tCO₂e. related to data quality improvement from estimated to actual energy consumption data.
8. The emissions do not include the scope 3 emissions from our asset manager.
9. For category 15 we have a SBTi validated reduction target for our mortgage portfolio.

to reporting guidelines and regulations such as the CSRD, now disclose a broader range of emission categories (related to scope 3). As a result, their reported emissions intensity has risen, which in turn elevates the emission factors we use in our calculations. In all other scope 3 categories the emissions reduced. 98% of our GHG emissions are from category 15: Investments. In table 'Financed emissions per asset class', a breakdown per asset class is provided. In comparison to reporting year 2024, our total emissions decreased by 14%.

Due to timing issues and methodological differences, and ambiguity within the financial sector about the obligatory nature of including the financed emissions of asset managers, ASN Bank does not consolidate scope 3 GHG emission information from the asset management activities of ASN Impact Investors. In 2026, ASN Bank is taking steps to further analyse and solve the issues regarding timing and methodology. In anticipation of more guidance on this topic, ASN Bank may reconsider the need to include this information in the sustainability statements.

Metrics

In the Appendix [Methodology own operations and upstream and downstream emissions](#) and in the Appendix [Methodology financed emissions](#), we disclose assumptions, limitations and approximations, our control approach, emission factors, use of primary data and our application of the GHG protocol and PCAF. We also explain why we exclude certain scope 3 categories.

GHG removals and GHG mitigation projects financed through carbon credits

To reach our net zero KPI we have to neutralise 100% of the residual emission by 2050. We do this by financing nature-based CO₂e removal projects. We consider the supply chain of these projects and consider direct and indirect land use, the use of raw materials, social consequences and the impact on the environment and biodiversity. Nature-based removal projects are effective and benefit both climate and biodiversity.

We offset the market-based CO₂e emissions by purchasing carbon credits from Trees for All. For 2024, we offset 1,991 tonnes of CO₂e emissions, in 2025 we offset 1,345 tonnes of CO₂e emissions. The carbon credits are verified by Plan Vivo. Furthermore, the offsets for reporting year 2025 will be cancelled after one year, when we buy carbon credits for reporting year 2026. Finally, the projects which we buy into are monitored by Trees for All for 10 years to manage non-performance.

Part of the CO₂e-emissions of ASN Bank were offset using carbon credits. In 2025, and previously in 2024:

- ASN Bank purchased 0% carbon credits related to reduction projects

- 100% of the carbon credits were related to removal projects, derived from projects related to biogenic sinks
- 100% of the carbon credits have a Plan Vivo certification
- 0% of the carbon credits have been issued by projects within the European Union
- 0% of the carbon credits qualifies as a corresponding adjustment under Article. 6 of the Paris Agreement.

Current and future investment activities

Description of our compliance

ASN Bank invests in EU Taxonomy aligned activities in the following portfolios:

- Household portfolio of which loans collateralised by residential immovable property.
- Financial corporation subject to CSRD disclosure obligations and, for bonds with known use of proceeds, CSRD and non-CSRD financial corporations.
- Non-financial corporations subject to CSRD and, for bonds with known use of proceeds, CSRD and non-CSRD counterparties.

Regarding future investments, we expect the EU Taxonomy Regulation KPI scores to improve while progressing on our net zero goal, Science Based Targets, Climate Action Plan goals and by pursuing our sustainability policies. We will continue to engage with retail mortgage customers to encourage them to make their homes more sustainable.

ASN Bank has expanded the Product Approval Process framework and Product Review Process framework to include ESG questions, such as: does the product or service actively contribute to the realisation of one of the bank's non-financial objectives (e.g. our net zero target) and is it in line with the principles of our sustainability policy.

Methodology financed emissions

Reporting requirements

The GHG Protocol 'Corporate Value Chain Standard' offers guidance to identify and report on emissions from relevant loans. These include emissions from loans and investments reported under scope 3, category 15: Investments, which is the banks' most material category to take into account. We report on our GHG emissions in our annual reports in conjunction with our full-year financial results.

Scope

Emissions from all relevant balance sheet items of ASN Bank are included. Cash and balances at central banks do not lead to changes in the real economy because they are temporary balances and are left out of scope. Derivatives are also out of scope to avoid double counting. Tax assets, and 'other assets' do not cause GHG emissions and are therefore set at zero emissions. Tangible and intangible assets are

already taken into account in the emission calculations of the business operations. Consumer loans are not yet incorporated in the calculation as the amount of loans is negligible. The rest of the accounting balance sheet is taken into account. The CO₂e emission calculations are performed in accordance with the GHG Protocol's operational control approach. In our GHG accounting and reporting, we follow the principles of relevance, completeness, consistency, transparency and accuracy. Furthermore, financed emissions are always accounted for with the prudence principle in mind.

Reporting

All seven greenhouse gases under the Kyoto protocol are taken into account and expressed in CO₂ equivalents using the 100-year time horizon global warming potentials determined by the Intergovernmental Panel on Climate Change (IPCC). We disclose the financed scope 1, 2 and 3 emissions of all our relevant loans and investments. Financed carbon removals are calculated and reported separately from financed emissions. For the mortgage portfolio, we also report on the energy efficiency rating distribution based on the latest available registered energy efficiency ratings (*Rijksdienst Voor Ondernemend Nederland, RVO*).

Process

For new loans and green bonds the most recent emissions data is used. Emission factors and data sources used for the calculations are updated annually in the fourth quarter to ensure we use recent data in our calculations. Our Sustainability team collects emission data and financial data from investees and prepares financed emissions calculations on a monthly basis. The results are discussed and approved by the ESG Impact Committee on a quarterly basis. The results are also processed in relevant management and risk reports.

Methodology

At the end of 2022 PCAF published its latest version of the global GHG Accounting and Reporting Standard. We apply this version of the methodology for the financed emissions in relation to our net zero KPI in our scope 3, category 15: Investments. The methodology is not validated by an external body.

Data quality

For each of the asset classes, we apply the corresponding data quality scores of the PCAF methodology. The weighted average data quality score for all assets was calculated at 2.7 (1 = highest data quality; 5 = lowest data quality). We continually strive to increase the data quality of the data in our calculations, as it increases the accuracy of our calculations and reduces the measurement uncertainty. In 2024, we updated the anonymised energy consumption data of the customers in our mortgage portfolio. In order to do so, we clustered the mortgage portfolio of our four brands,

definitive or preliminary energy efficiency rating, and the EPC score (A++++ to G). The grid operators linked gas- and electricity consumption to the portfolio and returned the results aggregated on cluster level. As such, characteristics like the presence of a preliminary energy efficiency rating are only used to cluster and not directly for carbon accounting purposes.

For the asset class-specific considerations, description of data sources used in our calculations and the data quality score (DQS), see the table below.

There is measurement uncertainty as data sources are subject to change during or after the reporting period.

PCAF methodology financed emissions

Asset class	Chapter in PCAF global GHG standard	Considerations on attribution	Data sources used in calculations	PCAF DQS
Unlisted Equity	5.2. Business loans and unlisted equity	Attribution based on book value	Annual and sustainability reports of counterparties. When unavailable, we apply emission factors based on sector averages.	2.6
Sovereign bonds	5.7 Sovereign debt	Attribution based on outstanding nominal amount	Emissions are calculated based on the PCAF web-based emission factors database for sovereign bonds. We use consumption based emissions including LULUCF ¹ .	1.6
Corporate bonds	5.1. Listed equity and Corporate bonds	Attribution based on outstanding nominal amount	Reported emissions derived from annual or sustainability reports. When unavailable, we use sector averages emission factors. In the case of earmarked bonds, for example in the case of green bonds, reported emissions or carbon removals are used.	3.2
Retail mortgages	5.5. Mortgages	Attribution based on Loan to Value at origination.	Emissions are calculated based on standardised annual gas and electricity consumption data as per reference date 1-1-2024. This anonymised data is retrieved from Partners in Energie and is applicable to our entire residential mortgage portfolio. The gas and electricity use is converted to CO ₂ -equivalents using the Tank-to-Wheel value for natural gas from co2emissiefactoren.nl (updated in January 2024), and the emission factor for electricity in 2022, as calculated by the Dutch statistics agency (CBS) using the integral method.	3.2
Business mortgages	5.5. Mortgages	Attribution based on market value	Emissions are calculated based on the PCAF web-based emission factors database with Dutch emission factors per sector based on asset value (db.carbonaccountingfinancials.com).	5.0
Business loans	5.2. Business loans and unlisted equity	Attribution based on book value	Klimaatmonitor Waterschappen (2023), Regionale klimaatmonitor Rijksoverheid (2023), AEDES benchmark (2022), annual and sustainability reports of counterparties. When data was unavailable, we apply the PCAF web-based emission factor database with the Dutch emission factors per sector based on asset value (db.carbonaccountingfinancials.com).	4.4
Project finance	5.3. Project finance	Attribution based on book value	Ex-ante estimates of emissions based on P90 energy generation values from due diligence reports. In some cases, we use actual annual energy production data.	2.9

1. Land Use, Land-use Change and Forestry

Methodology own operations and upstream and downstream emissions Reporting requirements

Scope 1, 2 and 3 are calculated in accordance with the Greenhouse Gas Protocol 'Corporate Value Chain Standard'. The GHG protocol offers guidance to identify and report on relevant emission categories. In our GHG accounting and reporting, we follow the principles of relevance, completeness, consistency, transparency and accuracy.

Scope

The organisational boundary determines which operations and subsidiaries are included in the bank's carbon accounting. We include emissions within our organisational boundaries covering our own operations, upstream and downstream

activities. This includes the following entities: ASN Bank and its subsidiaries, such as ASN Impact investors and Fitrex.

The consolidation approach determines which emissions are categorised as direct and indirect emissions within the organisational boundaries, which affects under which scopes certain emissions are reported. We apply operational control as our consolidation approach, which means that the activities leading to emissions over which ASN Bank has direct control over, are part of scope 1 and scope 2. All other emissions are considered to be part of the value chain, thus Scope 3. We chose this approach, because we deem ourselves responsible for the emissions caused by our own activities.

We include the emissions from scope 1 and 2 and scope 3 categories 1, 5, 6, 7, 13 and 14. We include Cloud service separately in Category 1 and Category 14: Franchises for the first time. Category 15 is included in our scope, the methodology is explained in [Methodology financed emissions](#).

We exclude scope 3 categories in our calculations when they are not relevant or material to ASN Bank or when emission data is considered sufficiently reliable, influenceable, significant and quantifiable. The following categories are excluded:

- Category 2: Capital goods is excluded as our capital goods are considered in category 1: Purchased goods and services.
- Category 3: Fuel and energy-related activities is excluded as we disclose these emissions in scope 1 and 2.
- Category 4: Upstream transport and distribution is excluded as our financial services do not require transportation or distribution.
- Category 8: Upstream leased assets is excluded as the emissions of our leased vehicles are included in scope 1.
- Category 9: Downstream transportation is excluded as we outsource transportation to a post-service company, we included these emissions in category 1: Purchased goods and services.
- Category 10: Processing of sold products is not applicable since we do not sell physical products.
- Category 11: Use of sold products is not applicable since we do not sell physical products.
- Category 12: End-of-life treatment of sold products is not applicable since we do not sell physical products.

Reporting

All seven greenhouse gases under the Kyoto protocol are considered and expressed in CO₂ equivalents using the 100-year time horizon global warming potentials determined by the Intergovernmental Panel on Climate Change (IPCC). To align with the methodology as stated in the ESRS we adjusted the emission factors for our market-based and location-based emissions in scope 2.

Methodology

We apply the GHG protocol to calculate our scope 1, 2 and 3 emissions. Depending on data availability we applied the activity-based or spend-based approach to calculate the emissions. We multiply the activity-based or spend-based data with the corresponding emissions factor of the activity.

- Scope 1: Direct GHG emissions are calculated using activity-specific data for natural gas use and fuel-use for company-controlled vehicles.

- Scope 2: Indirect GHG emissions are calculated with both the market-based and the location-based emissions factors for electricity. Location-based emissions are average country-based emissions, while market-based emissions include renewable electricity, and regular electricity is regarded as residual energy. We have adopted a conservative approach to market-based emissions.

For district heating we apply grid-specific emission factors in the market-based approach.

- Scope 3 Category 1: Purchased goods and services is calculated using a hybrid method, combining supplier specific data with average data and supplemented with spend-based data. We calculate the emissions from our IT and cloud services.
- Scope 3 Category 5: Waste generated in own operations is calculated using supplier-specific and waste-type specific data. This is provided by the bank's external waste management partner.
- Scope 3 Category 6: Business travel is calculated using the distance-based method. We consider distance travelled and the mode of transport. When distance-based data was unavailable, we include spend-based data.
- Scope 3 Category 7: Employee commuting is calculated using the distance-based method. We consider distance travelled and the mode of transport.
- Scope 3 Category 13: Downstream leased assets is calculated with the leased floor space and the scope 1 and market-based scope 2 emissions from our own offices.
- Scope 3 Category 14: Franchises is calculated by considering the scope 1 and the market-based scope 2 emissions from our franchises and an average attribution factor related to the revenue of ASN Bank products.
- Scope 3 Category 15: Investments is calculated in accordance with PCAF global GHG Accounting and Reporting Standard. For details see [Methodology financed emissions](#).

We use CO₂emissiefactoren.nl for the emission factors of energy and transport in Scope 1, 2 and the Scope 3 categories 6, 7, 13 and 14. In Scope 3, category 1 we used annual reports from our suppliers to determine the emission factor based on revenue and their scope 1, 2 and 3 emissions. In Scope 3, category 5 we used the emission factors provided by our waste service provider.

We collaborate with energy providers to collect data and apply conversion factors when necessary.

Assumptions, limitations and approximations

Assumptions, limitations and approximations in our own operations emissions calculations increase to measurement uncertainty. To mitigate the uncertainty we include primary data where possible. In addition, we prefer activity-based data over spend-based data. Spend-based data is less accurate as it considers monetary value,

which is subject to inflation and price differences – either over time or between suppliers – and the emission factors are a sector average. In the case that data was unavailable (<5%) for a category, an extrapolation of the existing data was made. We assume that the emission intensity is comparable to the available data.

In our scope 1 calculations, the electricity required to charge company vehicles at home is also covered by renewable energy contracts through our company policy, which mandates that employees with company lease car, to charge their car with renewable electricity at home. Following the principles of the GHG protocol, our location-based scope 2 emissions are not influenced by contractual instruments.

For our market-based scope 2 emissions we use renewable energy certificates as contractual instruments to ensure that we do not emit greenhouse gases of our electricity use. 100% of these instruments imply that the electricity is generated using renewable energy sources. Of which 12% is bundled with a renewable energy contract of Dutch wind or solar energy and 88% are purchased with an unbundled renewable energy certificate for European wind or solar energy.

Data is considered primary data if it is input from specific activities within the entity's upstream and downstream value chain are included in the activity data or from the reported emissions from our business partners. In our scope 3 calculations, 15% of the emissions are calculated with primary data. Increasing the level primary data, improves the level of accuracy of the calculation.

In our scope 3 emission calculations, we used where possible, emission data from the 2024 annual reports of companies in our value chain. When the annual reports of our counterparties could not provide the necessary information, we opted for emission data based on macroeconomic key figures and sectoral emission data. In 2023 the effects of the energy crisis, caused by the war in Ukraine, might have had a diminishing effect on energy use and, consequently the emissions of the companies in our value chain. The same applies to the 2023 emission calculations, where 2022 emission data was used, while there were still Covid-19-related measures in place leading to lower scope 1 and 2 emissions.

14.2 ESG risks quantitative disclosures

In line with the latest regulatory developments as a result of the Omnibus I regulations, template 6 to 10 are excluded. Consequently, the templates have been removed from our Pillar 3 disclosures 2025.

For templates 1 to 5 each template has a different purpose for providing information and can be categorised as:

- Climate change transition risk (templates 1 to 4).

- Climate change physical risk (template 5).

The climate risk templates' purpose is to show how climate change may exacerbate other risks within banks' balance sheets, whether it be the risk of stranded carbon intensive assets or loans to property within a flood plain. The purpose of the qualitative disclosures in the Section [14.1 ESG Qualitative disclosures](#) is to describe ASN Bank's ESG strategies, governance and risk management arrangements with regard to ESG risks.

Template 1: Banking Book- Indicators of potential climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity 2025

Sector/subsector	a	b	d	e	f	g	h	i	j	k	l	m	n	o	p
In € millions	Gross carrying amount			Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions				GHG financed emissions ¹		% of the portfolio derived from company-specific reporting	Residual maturity				Average weighted maturity ²
	Of which exposures towards companies excluded from EU Paris-aligned Benchmarks ³	Of which stage 2	Of which non-performing	Of which Stage 2	Of which non-performing	Of which Scope 3 financed emissions	Of which Scope 3 financed emissions	<= 5 yrs	> 5 yr <= 10 yrs		> 10 yr <= 20 yrs	> 20 yrs			
1 Exposures towards sectors that highly contribute to climate change ⁴	1,576	1	21	33	-8	-1	-5	107,791	78,937	34.01%	456	440	665	15	9
2 A - Agriculture, forestry and fishing	1	-	-	0	-0	-	-0	118	30	0.00%	-	1	-	0	11
9 C - Manufacturing	116	-	1	0	-0	-0	-0	56,642	53,882	61.07%	53	36	24	3	7
10 C.10 - Manufacture of food products	36	-	0	0	-0	-0	-0	45,195	44,866	91.98%	29	4	1	2	4
13 C.13 - Manufacture of textiles	0	-	0	-	-0	-0	-	36	31	-	-	-	-	0	21
14 C.14 - Manufacture of wearing apparel	0	-	-	-	-	-	-	-	-	-	-	-	-	0	21
16 C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials	0	-	0	-	-0	-0	-	90	80	-	-	-	-	0	21
20 C.20 - Production of chemicals	17	-	-	-	-0	-	-	6,027	5,627	99.38%	-	17	-	0	9
21 C.21 - Manufacture of pharmaceutical preparations	0	-	-	-	-	-	-	-	-	-	-	-	-	0	21
22 C.22 - Manufacture of rubber products	1	-	0	-	-0	-0	-	32	2	-	1	-	0	0	8
23 C.23 - Manufacture of other non-metallic mineral products	2	-	-	-	-0	-	-	1,300	-	-	-	1	1	-	12
25 C.25 - Manufacture of fabricated metal products, except machinery and equipment	3	-	0	0	-0	-0	-0	257	129	-	0	2	0	0	11
26 C.26 - Manufacture of computer, electronic and optical products	0	-	-	-	-	-	-	-	-	-	-	-	-	0	21
27 C.27 - Manufacture of electrical equipment	33	-	-	-	-0	-	-	3,190	3,094	61.85%	23	10	-	0	5
28 C.28 - Manufacture of machinery and equipment n.e.c.	19	-	0	-	-0	-0	-	342	26	-	-	0	19	0	12
30 C.30 - Manufacture of other transport equipment	0	-	0	-	-0	-0	-	38	-	-	-	-	0	0	16
31 C.31 - Manufacture of furniture	2	-	-	-	-0	-	-	42	-	-	0	0	2	0	16
32 C.32 - Other manufacturing	1	-	-	-	-0	-	-	-	-	-	-	1	-	-	8
33 C.33 - Repair and installation of machinery and equipment	1	-	0	-	-0	-0	-	93	27	-	-	-	1	0	18
34 D - Electricity, gas, steam and air conditioning supply	833	-	4	28	-5	-0	-4	28,677	10,790	22.31%	191	192	450	0	10
35 D35.1 - Electric power generation, transmission and distribution	830	-	3	28	-5	-0	-4	28,677	10,790	22.36%	191	191	448	0	10
36 D35.11 - Production of electricity	533	-	3	3	-2	-0	-2	12,715	-	-	65	125	343	-	11

Sector/subsector	a	b	d	e	f	g	h	i	j	k	l	m	n	o	p
	Gross carrying amount				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions				GHG financed emissions ¹		% of the portfolio derived from company-specific reporting	Average weighted maturity ²			
In € millions	Of which exposures towards companies excluded from EU Paris-aligned Benchmarks ³	Of which stage 2	Of which non-performing		Of which Stage 2	Of which non-performing		Of which Scope 3 financed emissions				<= 5 yrs	> 5 yr <= 10 yrs	> 10 yr <= 20 yrs	> 20 yrs
38 D35.3 - Steam and air conditioning supply											2		2		-0
39 E - Water supply; sewerage, waste management and remediation activities	0	-	0	-	-0	-0	-	5	4	0.00%	-	-	-	0	21
40 F - Construction	64	-	1	0	-0	-0	-0	3,481	2,299	43.86%	29	1	33	2	8
41 F.41 - Construction of buildings	9		0	0	-0	-0	-0	232	102		-	0	8	0	17
42 F.42 - Civil engineering	1		0	0	-0	-0	-0	73	43		0	-	1	0	16
43 F.43 - Specialised construction activities	54		0	0	-0	-0	-0	3,176	2,154	52.08%	28	1	24	1	7
44 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	133	1	4	1	-1	-0	-0	8,961	5,856	71.93%	67	37	25	5	7
45 H - Transportation and storage	114	0	0	0	-0	-0	-0	5,929	4,210	96.58%	38	72	3	1	7
46 H.49 - Land transport and transport via pipelines	88		0	0	-0	-0	-0	3,323	2,211	97.78%	38	49	1	1	6
47 H.50 - Water transport	0	0	0	0	-0	-0	-0	18	10		-	-	-	0	21
49 H.52 - Warehousing and support activities for transportation	26		0	0	-0	-0	-0	2,587	1,989	93.39%	-	24	2	-	9
50 H.53 - Postal and courier activities	0		0	0	-0	-0	-	1	-		-	0	-	0	18
51 I - Accommodation and food service activities	2	-	0	0	-0	-0	-0	33	20	0.00%	0	-	2	0	16
52 L - Real estate activities	313	-	11	4	-2	-1	-1	3,945	1,846	14.52%	80	101	129	4	10
53 Exposures towards sectors other than those that highly contribute to climate change ⁴	10,748	135	32	33	-18	-2	-9				8,552	965	591	640	4
54 K - Financial and insurance activities	10,354	134	17	4	-8	-1	-1				8,456	882	384	632	4
55 Exposures to other sectors (NACE codes J, M - U)	395	1	15	29	-10	-1	-8				97	83	207	8	12
56 TOTAL	12,324	136	53	66	-26	-3	-14	107,791	78,937	4.35%	9,008	1,405	1,257	655	5

1. Scope 1, scope 2 and scope 3 emissions of the counterparty (in tons of CO2 equivalent)

2. In years.

3. in accordance with Article 12(1) points (d) to (g) and Article 12(2) of Regulation (EU) 2020/1818

4. In accordance with the Commission delegated regulation EU) 2020/1818 supplementing regulation (EU) 2016/1011 as regards minimum standards for EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks -Climate Benchmark Standards Regulation - Recital 6: Sectors listed in Sections A to H and Section L of Annex I to Regulation (EC) No 1893/2006

Template 1

As shown in the table above, we have excluded column c 'Of which environmentally sustainable (CCM)' from this template, in line with the latest regulatory developments as part of the Omnibus I package.

We have included our exposures along with GHG financed emissions and residual maturity for non-financial corporations, disaggregated in the related sectors. Our greatest exposure towards sectors that highly contribute to climate change for non-

financial corporations is due to renewable energy projects, which are included in sector D - Electricity, gas, steam and air conditioning supply. As this exposure mainly concerns renewable energy projects such as solar, wind parks and biomass, and does not include any clients in the (fossil) gas sector, this leads to a relatively small number of financed emissions, and we assess our exposure to transition risk in sectors that highly contribute to climate change to be low. The results show no significant changes compared to 2024.

Template 2

We use the database from the Netherlands Enterprise Agency (RVO) to source definitive EPC labels and, if available, EP score of loans collateralised by immovable property. We estimate the EP score if there is no information available on the EP score from the RVO database. Definitive, preliminary or expired EPC label without EP scores are classified in the following manner:

- A+ and higher are mapped to column b “0; <= 100” kWh/m².
- A and B is mapped to column c “> 100; <= 200” kWh/m².
- C and D is mapped to column d “> 200; <= 300” kWh/m².
- E is mapped to column e “> 300; <= 400” kWh/m².
- F is mapped to column e “> 300; <= 400” kWh/m².
- G is mapped to column f “> 400; <= 500” kWh/m².

In case there is no EPC label known to map the EP score, we use an alternative approach as described below.

Loans collateralised by residential immovable property without definitive, preliminary or expired EPC label

The estimation of energy performance of residential immovable property without definitive, preliminary or expired EPC labels is based on energy consumption data received from Partners in Energie, a collaboration of Dutch grid operators. We receive averages of energy consumption per specified cluster, to avoid sharing privacy-sensitive data. These clusters are composed of collateral based on characteristics, specific to the portfolio of ASN Bank, such as brand, type of EPC label (definitive, preliminary, expired) and EPC score (G till A++++). There is an additional cluster for property without an EPC labels. We use the average energy consumption from this cluster, divided by the surface area of the property to derive an estimation energy performance.

Loans collateralised by commercial immovable property without definitive, preliminary or expired EPC label

For loans collateralised by commercial immovable property we estimate the levels of energy efficiency based on average scope 1 and 2 emission factors per NACE sector, available via PCAF. These emission factors (tCO₂/million euros) are calculated to (kWh/euro) using CBS emission factor data (scope 2) and CO₂emissiefactoren.nl (scope 1). The sector specific energy factors are multiplied by the gross carrying amount and divided by the surface (square meters) of the collateral.

In 2025, the total gross carrying amount increased which resulted in an inflow of loans collateralised by immovable property with relatively better levels of energy efficiency.

Alignment metrics

Template 3: Banking Book - Indicators of potential climate change transition risk: Alignment metrics 2025

a	b	c	d	e	f	g
Sector	NACE Sectors	Portfolio gross carrying amount (in € millions)	Alignment metric	Year of reference	Distance to IEA NZE2050 in % ¹	Target ²
1 Power	35.11	533	0,014 tCO ₂ /MWh	2025	-90%	0,198 tCO ₂ /MWh
1 Power	35.11	533	0% Average share of high carbon technologies (oil, gas, coal)	2025	-100%	33% Average share of high carbon technologies (oil, gas, coal)
9 Residential and commercial mortgages	n.a.	57,999	20,133 kgCO ₂ e/m ²	2025	49%	17,411 kgCO ₂ e/m ²

1. PIT distance to 2030 NZE2050 scenario in % (for each metric)

2. Year of reference + 3 years

Template 3

ASN Bank is the first bank in the Netherlands with validated [Science Based Targets](#) (SBTs) by the Science Based Targets initiative (SBTi). Targets were set for or a range of core activities in line with the Paris Agreement, based on the International Energy Agency Net Zero Emissions by 2050 Scenario (IEA NZE 2050). This includes an SBT on our residential and commercial mortgage portfolio and an SBT on Electricity Generation Project Finance (Power). We have included these targets in this template.

We will not set SBTs for other sectors, as the other sectors are not our core activities or are excluded via our sustainability policies. As such, we have insignificant exposures in the sectors of fossil fuel combustion, automotive (with the exception that we can finance electric vehicles), aviation, cement clinker and lime production, and chemicals and have not identified specific targets in this template. Furthermore, we have limited SME exposures in the sectors maritime transport, iron and steel, coke, and metal ore production. Please find below more information per sector for which we have set an SBT.

Power (SBT)

ASN Bank commits to continue only financing renewable electricity through 2030. The SBTi methodology applies a maintenance target for companies who are already at 100% renewable electricity financing. Since ASN Bank already complies with this SBT it was not required to set alignment metrics. In order to show our progress in this

template, we have calculated two types of alignment metrics with the corresponding targets for 2030 based on the IEA NZE 2050 scenario.

1. Alignment metric in tCO₂/MWh

For the calculation of our alignment metric, we looked at all our exposures to the power sector. Due to our sustainability policies, almost all of our exposures concern renewable energy projects. Our alignment metric in tCO₂/MWh is based on total emissions caused by our financed renewable energy projects per generated MWh. We compare this alignment metric with the targets as stated in Table A.5 of the IEA (2021) in the Net Zero Emissions by 2050: A Roadmap for the Global Energy Sector.

Here we used the target of the NZE 2050 scenario of the electricity sector for the world expressed in CO₂-intensity of electricity generation to establish our distance to this respective target. We used trend analysis to determine the target in three years.

2. Alignment metric in Average share (%) of high carbon technologies (oil, gas, coal)

Our alignment metric with reference year 2025 is calculated on: 0% Average share of high carbon technologies (oil, gas, coal). We included all our exposures in the power sector to calculate the alignment metric. Due to our sustainability policies, we do not have exposures in high carbon technologies (oil, gas, coal) in the power sector. We compare this alignment metric with the targets as stated in Table A.3 of the IEA (2021) Net Zero Emissions by 2050: A Roadmap for the Global Energy Sector. Here we used the target of the NZE 2050 scenario of the electricity sector for the world expressed in average share of high carbon technologies (oil, gas, coal), to establish our distance to this respective target. We used trend analysis to determine the target in three years.

As our project finance portfolio solely consists of renewable energy companies within that sector and does not include any clients in the (fossil) gas sector, we assess our exposure to transition risk in sectors that highly contribute to climate change to be low.

Residential and commercial immovable property

ASN Bank commits to reduce mortgage portfolio GHG emissions with 59% per square meter by 2030 from a 2020 base year. The SBT has been set on all mortgage exposures including commercial and residential.

Alignment metric in: kgCO₂e/m²

The alignment metric is applicable to the entire mortgage portfolio, which is comprised of residential and commercial mortgages.

The emission intensity (kgCO₂e/m²) for residential mortgages has been calculated using gas- and electricity consumption data specific to ASN Bank's residential mortgage portfolio (2024 EOY portfolio composition). The energy consumption data have reference data 1-1-2025 and are retrieved from Partners in Energie, a collaboration of the Dutch grid operators. The gas- and electricity consumption is converted to CO₂-equivalents using emission factors applicable to the Dutch energy grid based on the energy mix of the Netherlands. The CO₂-equivalents are divided by the total surface area of the mortgage portfolio (sourced from BAGLV) to obtain the carbon intensity metric kgCO₂e/m².

The emissions for commercial mortgages are calculated using PCAF emission factors based on asset value per sector. The emissions for commercial mortgages are also converted to a carbon intensity metric by dividing the emissions by total surface area. Both residential and commercial mortgage portfolios are represented in one metric, as the Science Based Target is set for the whole mortgage portfolio.

The alignment metric has been updated with new energy consumption data for residential mortgages. Energy efficiency of the portfolio improved slightly. As a result, the distance to the 2030 target of the NZE 2050 scenario has improved slightly to 49%, compared to 52% in the previous year.

Template 4: Banking Book - Climate change transition risk: Exposures to top 20 carbon-intensive firms

ASN Bank has chosen the Carbon Majors Database launch report as a source for the top 20 carbon-intensive firms, based on emissions after the Paris Agreement. When assessing the exposures to the top 20 carbon-intensive firms, we apply a look through approach for special purpose vehicles on best effort basis. If there is a majority shareholder from a top 20 carbon-intensive firm, the exposure is included. As a result of our sustainability policies, we exclude almost all activities in the fossil fuel, mining, and iron, steel and coke production sector and therefore we have no exposure to the top 20 carbon-intensive firms. Therefore, Template 4 - Banking Book - Climate change transition risk: Exposures to top 20 carbon-intensive firms is not included in this report.

Template 5: Banking Book - Indicators of potential climate change physical risk: Exposures subject to physical risk 2025

a	b	c	d	e	f	g	h	i	j	k	l	m	n	o													
															Gross carrying amount												
															of which exposures sensitive to impact from climate change physical events												
Breakdown by maturity bucket													Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions														
In € millions	<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity ¹	of which chronic climate change events	of which acute climate change events	of which chronic and acute climate change events	Of which Stage 2 exposures	Of which non-performing exposures	of which Stage 2 exposures	Of which non-performing exposures															
1 A - Agriculture, forestry and fishing	1	-	-	-	-	-	-	-	-	-	-	-	-	-													
3 C - Manufacturing	116	0	0	0	-	15	0	-	0	-	-	-0	-	-													
4 D - Electricity, gas, steam and air conditioning supply	833	-	-	-	-	-	-	-	-	-	-	-	-	-													
5 E - Water supply; sewerage, waste management and remediation activities	0	-	-	-	-	-	-	-	-	-	-	-	-	-													
6 F - Construction	64	-	0	-	-	7	0	-	-	-	-	-0	-	-													
7 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	133	-	0	0	-	18	1	-	-	-	-	-0	-	-													
8 H - Transportation and storage	114	-	-	0	-	16	0	-	-	-	-	-0	-	-													
9 L - Real estate activities	313	-	-	6	-	18	5	-	1	2	-	-0	-0	-													
10 Loans collateralised by residential immovable property	56,580	78	183	454	1,864	23	2,437	-	142	315	20	-2	-1	-1													
11 Loans collateralised by commercial immovable property	1,419	1	5	56	-	18	59	-	3	7	1	-1	-0	-0													

1. In years.

Template 5

Given the concentration of activities of ASN Bank in the Netherlands, the only material geographic area for the assessment of potential climate change physical risk is the Netherlands. The vast majority of activities in the Netherlands is related to loans collateralised by residential and commercial immovable property.

The location of the collateral is used for residential and commercial immovable property. For other loans, the residence of the counterparty is used for the assessment. ASN Bank consulted the data from the [Climate Impact Atlas](#). The categorisation for all maps is available on the level of the coordinates of the collateral. We mapped the coordinates of the underlying collateral in our data to the categorisation of the maps in the Climate Impact Atlas regardless of the (loan) portfolio.

For chronic climate change events, ASN Bank categorised all exposures in regions with a high or very high risk to pole rot and/ or soil subsidence according to the maps in the Climate Impact Atlas, with the scenario 2050 Low. For acute and chronic climate change events, ASN Bank categorised all exposures in regions with a flood of 50 cm or higher and a probability of 1/300 and higher to the maps of the Climate Impact Atlas.

The Climate Impact Atlas does not differentiate between sea level rise (chronic physical climate risk) and flood (acute physical climate risk). Therefore, we included exposures sensitive to flood in the column with both chronic and acute climate change events.

The 2050 Low scenario has been chosen for chronic climate change events in order to ensure that all consulted maps have the same reference point. The flood risk map used for acute and chronic climate change events has a 2050 reference point.

The loans collateralised by residential immovable property sensitive for chronic climate change events increased due to an increase in the total portfolio.