NWB BANK

Annual Report

2025



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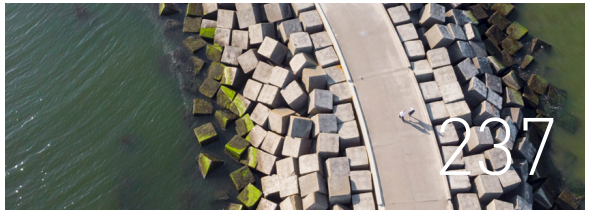
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Chapters 1 and 3 and the *Corporate governance* and *Risk management* sections in chapter 2 together form the annual report as referred to in Section 2:391 of the Dutch Civil Code. Insofar as it relates to NWB Bank's risk management, the Risk management section in chapter 4 is also part of the annual report from that perspective.

The Dutch copy of this annual report of Nederlandse Waterschapsbank N.V. for the reporting year that ended on 31 December 2025 has also been published in ESEF format as specified by the European Commission in the Regulatory Technical Standard on ESEF (Regulation 219/815). The ESEF reporting package is available on our corporate website **nwbbank.com**.

These financial statements are an English translation of the financial statements prepared on 23 March 2026. In case of any discrepancies or possible differences in interpretation between the English translation and the financial statements prepared on 23 March 2026, the latter prevail.

MANAGEMENT REPORT

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1



NWB BANK 2025 **AT A GLANCE** 1/2



Responsible and social return

NET PROFIT

€113 million

2024: € 94 million

RETURN ON EQUITY

5.3%

2024: 4.5%

PAYOUT RATIO

47%

2024: 53%

Bank of and for the public water sector

Key player in financing the Dutch public sector

Financing partner for enhancing sustainability in the Netherlands

Lending to the Dutch public sector

NEW LENDING

€11.1 billion

2024: €9.6 billion

WATER AUTHORITIES
€459 MILLION

DRINKING WATER COMPANIES
€135 MILLION

HOUSING ASSOCIATIONS
€8.2 BILLION

MUNICIPALITIES AND JOINT MUNICIPAL SCHEMES
€736 MILLION

HEALTHCARE INSTITUTIONS
€118 MILLION

LOANS WITH GOVERNMENT GUARANTEE
€42 MILLION

OTHER
€302 MILLION

RENEWABLE ENERGY
€227 MILLION

GRID OPERATORS
€372 MILLION

NHG RMBS
€495 MILLION

AUDACIOUS GOAL:
ENERGY POSITIVE BY 2035

6,999 TJ
Renewable energy generated

6,593 TJ
Energy consumed from fossil fuels

NWB BANK 2025 **AT A GLANCE** 2/2



Sustainable, efficient and socially engaged organisation

CET1-RATIO
36.8%

2024: 35.7%

14.7% minimum requirement

LEVERAGE RATIO
39.2%

3% minimum requirement

COST/INCOME RATIO
26.9%

2024: 28.6 %

BONDS ISSUED IN 2025
€10.9 billion

- ESG bonds* **4.1** billion
- Water bonds **1.0** billion
- SDG Housing Bonds **3.1** billion
- Other bonds **6.8** billion

* 38% of total funding raised in 2025

CO_2e EMISSIONS
1,419 kton

2025	
2024	1,496
2018	1,571

EMISSION INTENSITY
23.1 tonnes CO_2e/€ million

2025	
2024	25.4
2018	35.3

*Achieved reduction compared to 2018 **34.6%**
Target 2030 **16.9**

EMPLOYEES
172

Men **107**
Women **65**

MANAGEMENT TEAM
15

Men **8**
Women **7**

MANAGING BOARD
3

Men **2**
Women **1**

STAFF TURNOVER
12%

2024:17 %

ABSENTEEISM RATE

LONG-TERM
3.4%

2024: 2.8%

SHORT-TERM
0.5%

2024: 0.7%

KEY FINANCIALS

[1]	2025	2024	2023	2022	2021
(x EUR 1,000,000)					
BALANCE SHEET					
Long-term loans and advances (nominal value)[2]	59,204	56,991	53,854	52,167	51,888
Equity	2,157	2,094	2,060	1,995	1,902
Tier 1 capital	2,349	2,299	2,235	2,155	2,083
Total assets	72,868	78,769	75,909	73,285	96,019
Risk-weighted assets	5,490	5,550	4,659	4,792	4,641
RESULTS					
Net interest income	247	248	262	301	286
Results from financial transactions	-3	-37	-16	-30	-20
Operating income	244	211	246	271	266
Operating expenses	65	60	54	44	35
Bank tax and resolution levy	19	18	18	28	38
Expected Credit Loss	1	-	-	-	-
Income tax	46	39	48	56	72
Net profit	113	94	126	143	121
DIVIDEND					
Dividend distribution	53.0	50.0	60.0	60.0	50.0
Dividend (in euros per share)	898.5	847.6	1,017.1	1,017.1	847.6

1) An explanation of the calculation of the quantities shown in the key figures is included in the 'Glossary'
2) Loans including interest-bearing securities, provided to regional authorities and network operators

[1]	2025	2024	2023	2022	2021
(x EUR 1,000,000)					
RATIOS (IN %)					
Tier 1 ratio	42.8	41.4	48.0	45.0	44.9
CET1 ratio	36.8	35.7	41.1	38.3	38.0
Cost/income ratio[2]	26.9	28.6	21.8	16.2	13.0
Dividend pay-out ratio	47.1	53.4	47.7	41.9	41.2
Leverage ratio	39.2	24.0	20.6	18.9	14.3
Leverage ratio (not adjusted for promotional assets)	3.5	3.1	3.1	3.1	2.6
Liquidity Coverage Ratio	235	183	160	285	183
Net Stable Funding Ratio	148	134	133	141	133
CSR					
Volume of ESG bond issuance in millions of euros	4,117	3,979	3,766	4,703	3,550
CO_2 emissions equivalents from operating activities p.p. (in tonnes)	0.6	0.8[3]	0.5	0.9	1.2
CO_2 emissions equivalents PCAF portfolio coverage (in %)	98.8	98.4	98.3	91.9	90.7
CO_2 emissions equivalents loan portfolio (in kton)	1,419[4]	1,496[4]	1,458[4]	1,657[4]	1,731[4]

1) An explanation of the calculation of the quantities shown in the key figures is included in the 'Glossary'
2) 'Cost' concerns the operating expenses and 'income' the operating income
3) Commuting has been added in comparison to previous years, the previous years are not recalibrated.
4) Based on 98.8% of the loan portfolio (2024: 98.4%); The emission figures for 2025 and 2024 are calculated according to the most actual data. In addition, the 2024 figures have been adjusted as a result of methodological changes. The emission figures 2023, 2022 and 2021 are not recalculated.

Interview





Lidwin van Velden
CEO

"There is an urgent need for a more integrated and forward-looking approach to the societal challenges facing our security and resilience, and financing plays a crucial role in this"

"Looking back on 2025, Lidwin van Velden, Chair of the NWB Bank Managing Board, describes it as an intense and productive year. The geopolitical landscape became increasingly turbulent, with clear repercussions for Europe, the Netherlands and, by extension, the bank. Since its foundation, NWB Bank has played a key role in strengthening resilience and security.

By financing the long-term investments needed in areas such as water and housing, we are safeguarding not only our own resilience, but also that of future generations."

So what kind of year was 2025 for NWB Bank?

"In recent years, and this trend is likely to continue, we have seen a growing investment need among our clients. Last year alone, we provided more than €11 billion in new lending, primarily to the public water sector and social housing. Housing construction is a major priority in the Netherlands, encompassing both new developments and the sustainability upgrade of existing buildings. This has led to increased demand for loans from housing associations. Despite a volatile geopolitical environment, NWB Bank has once again succeeded in raising funding on international capital markets. This shows that we enjoy the trust of investors. All the more reason to remain vigilant in safeguarding our strong business model and to continue serving Dutch society as effectively as possible. At the same time, we look beyond national borders and factor in important European themes as strategic independence. This makes our contribution to sustainable energy particularly important. And I do not mean only wind and solar energy. For the first time, we are financing a geothermal project, in collaboration with Delft University of Technology and Rabobank. Furthermore, heating networks are seen as vital infrastructure and need to be expanded. NWB Bank is keen to play an active role in that transition as well."

Global warming has already reached the critical threshold of 1.5°C, and Europe is warming faster than any other continent. As a result, climate resilience has become a high priority on the European agenda.

"Europe is facing an unprecedented combination of challenges: rising geopolitical tensions, accelerating climate change, loss of biodiversity and a severe housing shortage. Extreme weather events are becoming more frequent and more severe, while water scarcity is increasingly likely in the years ahead. These developments underline the urgency of action. Progress requires collaboration and an integrated approach. When it comes to our safety, investing in climate and water resilience is essential. Over the past two years, in my roles as Chair of the European Association of Public Banks and CEO of NWB Bank, I have worked closely with colleagues on the report by the Reflection Group on Mobilising Climate Resilience Financing. This report was presented to European Commissioner Wopke Hoekstra in December. The group's work makes it clear that climate resilience is a shared responsibility that cuts across sectors, with efforts reinforcing one another. By embedding the principle of *resilience by design*, we can move from a reactive to a proactive approach, thereby preventing economic loss and social harm before they occur. This requires substantial but carefully targeted investments, not only from governments but also from the business community. Only then can we become sufficiently resilient to both extreme drought and flooding. The report sets out recommendations on how these investments can be financed, and how their long-term value can be recovered by anticipating the impacts of climate change: *resilience by design*."

Are you already working with this concept at the bank?

"As a bank, we recognise how closely interconnected the societal challenges facing our clients and society really are. In the spirit of *resilience by design*, we have joined forces with the Ymere housing association to launch a pilot project that brings together all parties involved in a residential development. These parties are also our clients, including the responsible water authority and drinking water company. The ambition is to develop a water-positive neighbourhood in Haarlem, which NWB Bank is helping to finance. It's our ambition that to establish a neigbourhood that offers an affordable and future-proof living environment through an integrated approach to water quality, water availability, greenery and climate adaptation. By collaborating from the outset, all parties will be able to identify synergies early on and develop a shared, integrated vision.

This project will show how much we can learn from one another, and how much value an integrated approach can add. The ultimate goal is to create a neighbourhood that is not only liveable and future-proof, but also avoids costs associated with climate damage and water scarcity later on. There is an urgent need for a more integrated, forward-looking approach to the societal challenges that affect our safety and resilience, and financing plays a crucial role in this. Europe is warming faster than the rest of the world. Forest fires and floods are becoming more frequent, nature is deteriorating, and water shortages and heat stress are emerging. At the same time, we face challenges in our energy supply, such as grid congestion, and we must recognise that tap water is not unlimited – something people experience directly when watering restrictions are in place during hot summers. Meanwhile, we must continue to safeguard our security and economic stability, while keeping everyday life affordable. That means investing now to prevent much higher costs in the future. The important task regarding housing offers an excellent opportunity to do just that.

Given that many issues are interconnected, it is only logical to adopt an integrated approach, as Peter Wennink also advocates in his report, *The route to future prosperity*. This approach creates synergy among the parties involved and is key to maintaining our country's earning capacity and liveability, while taking into account people, society and nature. Pursuing energy independence at both the national and European levels also contributes to strategic autonomy. To make this possible, we need a clear and consistent long-term plan from the new cabinet – one that the business community and the financial sector can support. Inconsistent policy is particularly damaging when it comes to long-term challenges. What we need

is an integrated, forward-looking strategy to address the issues facing the Netherlands."

This matters because, in addition to the climate crisis, we are also facing a housing crisis, not only in the Netherlands but throughout Europe.

"There are major shortages in social housing, but also in the mid-range segment. That is why the European Commission has launched the European Affordable Housing Plan, in which the European Association of Public Banks plays an important role. There is currently a significant gap between the availability and affordability of social housing and mid-range rental housing. Closing that gap is essential to improving mobility in the housing market. Equally important is knowledge-sharing among the parties involved, not only in construction but also in developing suitable financing structures. In this context, it is extremely helpful that the European Commission is extending state aid conditions for affordable housing to include the mid-range segment. This will allow public banks, which already play a major role in financing social housing, to expand their involvement in mid-range rental housing as well."

"We combine the professionalism of a financial institution with clear societal impact and a compact, flat organisational structure, which makes it easier to see the impact of your work"

And how is your own organisation doing?

"In terms of staffing, we have grown, though not at the pace we saw between 2021 and 2024. We have now reached a size that suits our organisation, and growth is beginning to level off. Our focus has therefore shifted to ensuring that everyone is in the right role and can work effectively, supported by effective knowledge sharing and the transfer of experience. We regularly conduct employee surveys to monitor well-being and job satisfaction, satisfaction, enabling us to take timely action. We have also introduced a job classification system to increase transparency and support development opportunities. In a few departments, we still rely on external staff, but our aim is to move towards internal staffing over the medium term. This is particularly relevant for our IT organisation, which has expanded rapidly and faces recruitment challenges in a tight labour market. That said, we are generally well positioned to attract new talent. This is largely due to the nature of our bank: we combine the professionalism of a financial institution with clear societal impact and a compact, flat organisational structure. This makes it easier for employees to see the tangible impact of their work, something that also strongly appeals to the younger generation.

Growth inevitably requires extra effort to maintain strong connections, especially with the rise of remote working. That is why we ask everyone to be in the office at least two days a week. This is essential for personal contact, mutual inspiration and a shared sense of what it means to be NWB Bank. Being in the office also means experiencing the day-to-day energy of the organisation. You hear about successful transactions at the coffee machine from colleagues who work on them and are in the office regularly. To be effective, we need to know where to find one another and understand each other's roles, so we can fulfil our mission: *together we invest in a water-conscious and sustainable society*.

To strengthen these connections, we organise a range of shared activities. Twice a year, employees visit one of our clients or sustainable projects during a" joint trip", giving them a first-hand view of the impact the bank is making. Once a year we also "engage in dialogue" with inspiring speakers who share their perspectives and insights regarding the bank's role. Recently, we welcomed Toon van der Klugt, former chair of a water authority and member of the bank's Supervisory Board, and Koos Biesmeijer, head of the Dutch Biodiversity and Society research group at Naturalis. Once a year, we hold the NWB Together Days, featuring inspiring speakers, challenging workshops and meaningful discussions. This year's theme was collaboration, and we were inspired by the story of competition sailor Gerd-Jan Poortman. Hearing about teamwork during the Ocean Race, while being exposed to the forces of nature, was both educational and motivating. Once again, it underlined how important it is to stay connected, to see

what we are achieving together, and to understand what we are all working towards."

There were also some changes at the management level.

"We had two changes in the managing board: Frenk van der Vliet reached his maximum term at the end of the year. Over the past 14 years, we have worked closely with him and achieved significant societal and sustainable results, and we will miss him as a person. We are pleased to welcome Elvira Eurlings as his successor. She brings extensive knowledge and experience in sustainability within the financial sector. We also hope to fill the CFO vacancy that arose in August in the near future. In the meantime, we have appointed an interim IT director with a wealth of experience in this crucial area: Tom Stoutenburg."

"Despite a volatile geopolitical environment, NWB Bank has once again succeeded in raising funding on international capital markets"



NWB Bank is a bank of and for the public sector, with a special focus on water and sustainability. Our excellent creditworthiness enables us to raise funding for our clients at favourable rates. In this way, we aim to contribute to the affordability of investments in a sustainable future for the Netherlands, thus keeping the financial burden on citizens as low as possible.

NWB BANK's PROFILE



WHO WE ARE

We are a national promotional bank. This means we contribute to public-sector objectives through our activities. NWB Bank was founded by and for the water authorities, but we soon started financing the wider Dutch public sector. We focus our financing on organisations and initiatives that deliver added value to society. We do not aim to maximise profits; instead, we seek to generate a sound return that enables us to continue contributing to public-sector objectives.

"We advance sustainability and safety while keeping costs for citizens low"



WHAT WE DO

We have been financing societal organisations, projects and funds in the Netherlands since our foundation in 1954. On 5 May of that year, our bank was established to help the water authorities with the huge investment task of protecting our country against water after the North Sea flood. There had been plans to establish a water authority bank as early as 1939, but the disaster in February 1953 was the catalyst that accelerated our establishment. Indeed, the bank immediately faced an important task.

Today, we face new challenges: sustainability and the energy transition are top priorities. The transition to a climate-neutral, nature-inclusive and circular economy will require major investments in the coming decades, which will need to be recouped over a long period. We are well-positioned and equipped to provide this kind of long-term financing. A major advantage is that we can provide appropriate financing for these long-term investments while keeping financing costs low for our clients. This is due to our excellent creditworthiness and efficient business model.



HOW WE DO IT

We raise the funds we lend to our clients in international money and capital markets, and, wherever possible, we do so by issuing ESG bonds. We finance the activities of water authorities with Green Bonds and those of housing associations with Social Bonds. We have extensive experience in these areas and have already raised over €35 billion through these channels since our first ESG bond issuance in 2014. This makes us a leader in the Netherlands and a prominent player internationally.

The position we have built up as a financial institution is partly due to our compact organisation and open culture. These ensure that we are effective, professional and inventive. Our organisation is also characterised by integrity: clients and other stakeholders can rely on us. And like our clients, we want to set a good example when it comes to sustainability within our organisation.

For instance, we only use company cars that do not emit CO_2, and our office has an energy label A+. Sustainable and socially responsible business is, therefore, also part of all our internal processes.

"We are increasingly funding our clients with ESG bonds"

The vast majority of our bank's loan portfolio consists of loans to (local) governments or institutions guaranteed by (local) governments. This is one of the reasons we have the highest credit ratings: AAA/Aaa. We are ranked sixth on the list of the world's safest banks. Thanks to our high creditworthiness, financial expertise and efficient organisation, we can respond proactively to the financing needs of the Dutch public sector, even in difficult times.

As a significant bank, we are directly supervised by the European Central Bank. The intensity and stringent requirements of this supervision are not materially different for a national promotional bank such as NWB Bank than for a strictly commercial bank. Together with our commitment to operating professionally and with expertise, this means that we continue to invest in our organisation, people and systems.

HISTORY TIMELINE



1939
First talks about founding of the Waterschapsbank



19 December 1952
In-principle decision by Dutch Water Authorities to found Waterschapsbank



5 May 1954
Founding of Nederlandse Waterschapsbank N.V.



1 February 1953
North Sea Flood



1996
AAA-Rating



2014
Issue of first Water Bond



2014
NWB Bank under direct supervision of ECB



2017
Issue of first Affordable Housing Bond



2022
Publication Climate action plan



2024
Publication ESG transition plan

Despite economic and geopolitical uncertainty, the Dutch economy grew by 1.7% in 2025 compared to the previous year. The impact of US import tariffs and pressure on European governments' debt levels, largely reflecting the need to increase defence spending, has so far had only a limited effect on economic growth in the Netherlands.

THE WORLD AROUND US



INFLATION

Global trade has continued to expand, despite higher US import tariffs, partly because companies anticipated these measures and because of increased public spending worldwide. As an open economy, the Netherlands has benefited from this trend. Economic growth was further supported by rising consumer spending, driven by higher wages.

According to Statistics Netherlands (CBS), average inflation in the Netherlands was 3.3% in 2025. This was largely due to rising housing costs and food and drink prices. This means that inflation was higher than the EU average of 2.1%, as it has been for several years. Dutch inflation is expected to remain high in 2026, driven by further wage increases and higher VAT rates.



INTEREST RATES

In 2025, the ECB lowered the interest rate on the deposit facility in several steps from 3.25% to 2% on 11 June 2025 in light of declining inflation and growth expectations. The ECB has not made any further interest rate changes since then, partly due to geopolitical uncertainty and the unclear impact on inflation.

Geopolitical uncertainty and pressure on government debt in the eurozone, partly due to increased defence and infrastructure spending, have led to higher long-term interest rates and a steeper yield curve. This effect was reinforced by the Netherlands' transition to a new pension system, which is expected to result in pension funds investing over shorter time periods. In 2025, short-term interest rates relevant to the money market fell by 1.25 percentage points to 2% due to the ECB's interest rate cuts. However, long-term interest rates actually rose. The 10-year interest rate increased by 0.6 percentage points to nearly 3%, while the 30-year rate rose by over 1 percentage point to 3.25%.



The geopolitical landscape is shifting from a unipolar to a multipolar world with multiple power blocs. We are witnessing the emergence of a fragmented world order with multiple centres of power, in which medium-sized players such as India, Brazil, Indonesia and the EU are playing a role alongside the United States and China. In addition, major corporations, such as American big tech, are also increasingly active on the world stage, pursuing their own geopolitical agendas. This is leading to growing conflicts of interest worldwide, as competition and confrontation are becoming more dominant than global cooperation. The year 2025 confirms this trend, with a shift towards a more transactional approach to foreign policy, in which bilateral agreements take precedence over multilateral alliances.

Increased geopolitical risk has prompted NWB Bank to pay closer attention to this in its risk management. See the **Risk Management** section in the Corporate Governance chapter, where this is discussed in more detail.

Against this backdrop and inspired by the 2024 Draghi report, the EU is shifting its focus to security and resilience, strategic autonomy, and competitiveness. It is laying the foundations for this through a broad agenda: simplifying regulations and decision-making, creating a strategic investment agenda, developing an integrated European capital market, implementing industrial policies and fostering innovation, enhancing climate and water resilience, and accelerating the deployment of renewable energy sources.

Elina Bardram indicates that investing in climate resilience is also part of this agenda, **Case: mobilising climate resilience financing**. Building climate resilience is not only about preventing damage and losses, but also about ensuring safety and long-term economic viability, as well as exploiting new opportunities.



In 2025, the water authorities continued to strengthen dikes, improve water quality and adapt the water system to increasingly extreme weather. The introduction of a new tax system should ensure fairer and more sustainable financing of water management. That said, the investment challenge remains considerable, driven in part by stricter European requirements and mounting pressure on water safety. Drinking water companies are stepping up their investments to secure a sustainable water supply for the future.

In 2025, housing associations again demonstrated a strong commitment to sustainability and new construction. Adjustments to project support, a higher maximum guarantee ceiling at the Social Housing Guarantee Fund (WSW) and the designation of so-called breakthrough locations for accelerated housing construction have contributed to greater investments in energy-efficient renovation and affordable housing. However, rising costs, a shortage of construction capacity and the need to build faster remain major challenges. The sector's financial position remained stable, supported in part by the growing guarantee capacity of the WSW.

Further progress was made in building a robust energy infrastructure in the field of sustainable energy. Grid operators and the government invested in new electricity connections, hydrogen pipelines and heat networks to support the energy transition. Through the Association of Netherlands Municipalities (VNG), municipalities played a central role in spatial integration and tackling network congestion. Following wind and solar energy projects, NWB Bank financed a geothermal project for the first time.

These developments demonstrate the Netherlands' ongoing efforts to enhance climate resilience, ensure a sustainable energy supply and create a future-proof living environment by 2025.

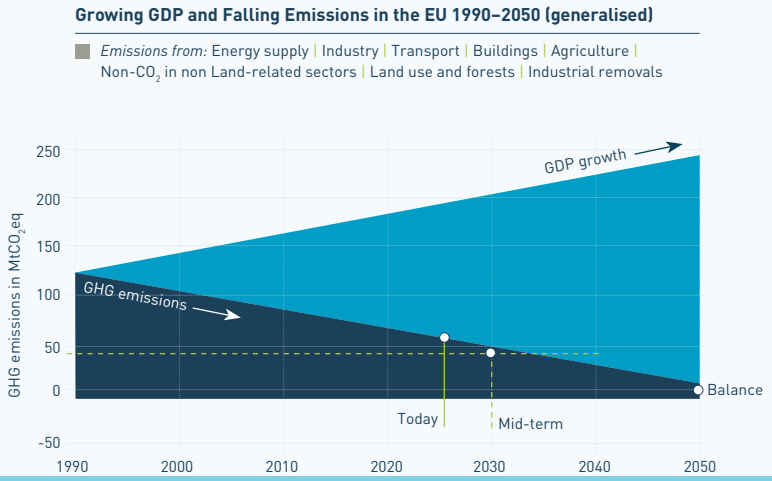
At the same time, it is important that basic needs, such as housing, are met. A shortage of available and affordable housing is not only a problem in the Netherlands but across the EU. Matthew Baldwin notes that the European Commission's Affordable Housing Plan, published in December, marks an important step in addressing this issue, see **Case: housing crisis**. NWB Bank contributed to the plan in its capacity as chair of the European Association of Public Banks. Following its implementation in the Netherlands, the amendment to the state aid rules will allow NWB Bank to expand its financing of social housing to include mid-range rentals, thereby promoting mobility.

In December, Peter Wennink presented the report *De route naar toekomstige welvaart* ('The route to future prosperity'). The report argues that structural choices, long-term investments and a strong national strategy are needed to safeguard the Netherlands' earning capacity. It will be up to the new cabinet to give substance to these choices. After the Schoof cabinet resigned on 3 June and elections were held on 29 October, a new government was formed following the announcement of a coalition agreement on 30 January 2026 by a minority cabinet of D66, CDA and VVD.

Sustainable earning capacity requires strong public services. Without water safety, adequate water availability, affordable housing, reliable and affordable utilities, a healthy natural environment and robust public infrastructure, economic growth is not possible. As a financier and partner to the public sector, NWB Bank actively contributes to this. Together with our public partners, we continuously explore ways to increase the effectiveness of our contribution to these societal challenges.

CASE: MOBILISING CLIMATE RESILIENCE FINANCING







Elina Bardram

Director for Climate Resilience & Infomation Management



Magdalena Bos-Lewandowska

Policy officer DG Climate Action

Resilience by design

CLIMATE RESILIENCE FOR A FUTURE-PROOF EU

Elina Bardram, Director for Climate Resilience and Information Management, and Magdalena Bos-Lewandowska, Policy Officer in the same field, are based in Brussels at the European Commission's Directorate-General for Climate Action. Reporting to European Commissioner Wopke Hoekstra, the Directorate is responsible for shaping EU climate policy. Bardram and Bos-Lewandowska reflect on the current state and direction of Europe's climate policies.

European Green Deal

- Climate Act makes climate neutrality by 2050 binding
- Goal: 90% less net emissions by 2040
- €275 billion for clean investments and 42% of funds to climate action

"According to the World Resources Institute, every euro invested in resilience prevents 10 euros in damage"

"The year 2025 was not a good one in the global fight against climate change. A new form of denial emerged, reflected in the rhetoric of certain individuals and countries, and this slowed progress on emissions reductions. At the same time, the European Union continues to move steadily towards 2040." This is the year by which the European Union must achieve its interim target of reducing greenhouse gas emissions by 90% compared to 1990 levels, as required by the European Climate Law and be on the pathway towards climate neutrality by 2050. Despite vocal climate scepticism, there has also been a noticeable shift in mindset, from hesitation to urgency. "There is growing awareness that inaction carries a very high price. We are already seeing the effects through more frequent extreme weather events, including in the Netherlands. If no action is taken, climate-related damage could rise to an estimated USD 400-800 billion per year by 2030." Cutting emissions and managing the physical risks associated with changing climate conditions, in other words, is not only an environmental necessity but an economic imperative.

Less dependent on global market

As the long-term damage may be immense, climate policy requires considerable investment in the near term. To explore how this can be achieved, the European Commission established the Reflection Group on Mobilising Climate Resilience Financing. Last December, the group presented its report to Wopke Hoekstra, the European Commissioner for Climate, Net Zero and Clean Growth. "The group brought together a broad range of stakeholders and experts. The discussions once again showed that resilience is economically sensible. A resilience-focused approach helps address vulnerabilities in supply chains, for example. Raw material prices can fluctuate sharply, and reducing dependence on global markets strengthens economic stability. Climate policy must move from ambition to action. By focusing on resilience, we become more future-proof, and it gives the EU a competitive edge thanks to a healthier business climate and the export of new technologies." With a subtle nod to climate sceptics: "Resilience offers concrete solutions to real-world problems."

"Climate policy from ambition to action. Resilience is also an economically sensible objective"

A rich source of expertise

National promotional banks and public banks, such as NWB Bank, played an active role in the discussion. According to Elina and Magdalena, their contribution was invaluable because, as financiers of the transition, they are uniquely positioned to make a real difference. Lidwin van Velden contributed to the report on behalf of NWB Bank and in her role as Chair of the European Association of Public Banks. "NWB Bank has a strong knowledge base and is a valuable source of expertise," Elina says. "Its experience goes back decades, including lessons learned from the devastating North Sea flood of the 1950s. The fact that large parts of the Netherlands lie below sea level has led to an exceptional accumulation of knowledge. That experience is highly relevant not



only for Europe, but also globally. Overall, the report provides an integrated policy vision. It does not present a single solution or a one-size-fits-all answer. Instead, it promotes a coherent approach that avoids fragmented measures. Our aim is not to lecture, but to inspire policymakers to take the next step in climate action. This is also what citizens are asking for: to reduce vulnerabilities and strengthen resilience as a precaution for the future."

Future revenue model

For the safety of society, the strength of the economy and the sustainability of Europe's future revenue model, action is needed now. Sustainable innovation offers significant opportunities in global markets. "We already see this in areas such as water management. Dutch expertise is in high demand worldwide, with engineers from the Netherlands helping other countries to prevent flooding. Precision agriculture is another example of knowledge that can be exported. The market potential is enormous, and demand will only continue to grow. Developments in climate science and climate policy are moving rapidly. This presents a major challenge, but also a major opportunity. That does not mean Europe should focus exclusively on resilience technologies. We must avoid becoming a one-trick pony. Nor is investing in resilience an alternative to reducing emissions; it is a necessary complement. Phasing out fossil fuels reduces our dependence on unpredictable partners. If you decarbonise, you no longer need to rely on oil states. If you add climate resilience – you are less vulnerable overall." This is precisely the kind of strategic autonomy Mario Draghi advocated in his 2024 report on safeguarding Europe's long-term competitiveness.



"For the safety of society, the strength of the economy and the sustainability of Europe's future revenue model. We are facing a major challenge, but also a major opportunity."

Pragmatism around CSRD

Critics argue that Europe's competitiveness is hampered by excessive regulation, a concern the European Commission decided to address. Last year, under the leadership of Commission President Ursula von der Leyen, a shift in approach took place: introducing fewer rules where possible, and reviewing and streamlining some existing ones. This change also extends to climate-related regulation. A notable example is the Corporate Sustainability Reporting Directive (CSRD), which obliges companies to report on their impact on people and the environment. Small and medium-sized enterprises are now exempt from these requirements. This is not seen as a setback within the Directorate-General for Climate Action, to which Bardram and Bos-Lewandowska are both deeply committed. "It was a matter of proportionality. There is a clear difference between a company with 1,000 employees and one with 5. The CSRD was introduced with the best of intentions, but in retrospect, the balance was not quite right. Limiting its scope to large companies is a pragmatic choice. That does not mean the EU is stepping back. On the contrary, we remain fully committed to delivering on our objectives."

Motivation rather than aversion

This debate underscores the importance of coordination with all stakeholders, a principle that the European Commission has embraced. Feasibility and proportionality now play a central role in climate policy, with stakeholders closely involved in decision-making to foster motivation rather than resistance. While this may mean policies take longer to design, it ultimately accelerates implementation by building broader support. "Measures need to be appropriate and practically applicable. They should be user-friendly, not overly dogmatic, and provide a realistic pathway. At this stage, it is important to create some breathing

space and ensure stability. What matters most is that the transition continues, because the problem will not resolve itself. Although we saw some pushback on international climate action in 2025, the European Union remains on course. And by investing in resilience, we are also strengthening our infrastructure in ways that support security and defence."

"'It is important that at the EU level we share an understanding of the probable climate scenarios for the longer term, and that we are equipped to manage the risks that come with it – building societal and economic resilience by design."

Chain reaction of effects

There is also a clear financial dimension. Last year, the European Environment Agency reported that climate-related damage in the EU amounted to €822 billion between 1980 and 2024. More strikingly: "25% of this damage occurred in the past four years alone. Recovery is clearly far more expensive than prevention. Analyses by the World Research Institute show that every euro invested in resilience avoids around 10 euros in future damage. It also prevents the loss of economic activity, as disaster-stricken areas are unable to generate income or tax revenues. In Slovenia, for example, the 2023 floods caused damage equivalent to around 15% of the country's GDP. And after the devastating forest fires around Los Angeles in early 2025, less than 12 houses have been rebuilt so far. These examples illustrate how floods and fires trigger cascading effects. Moreover, these impacts reinforce one another. Prolonged drought, for instance, weakens the soil's ability to absorb rainwater, increasing the risk of flooding when heavy rainfall does occur. The good news is that much can be done to prepare for what lies ahead through resilience by design. While some risks must be accepted, societies must be able to absorb major shocks. Planning for the future is essential. Waiting until it is too late is not an option. This responsibility applies to all of us: citizens, businesses and policymakers alike."

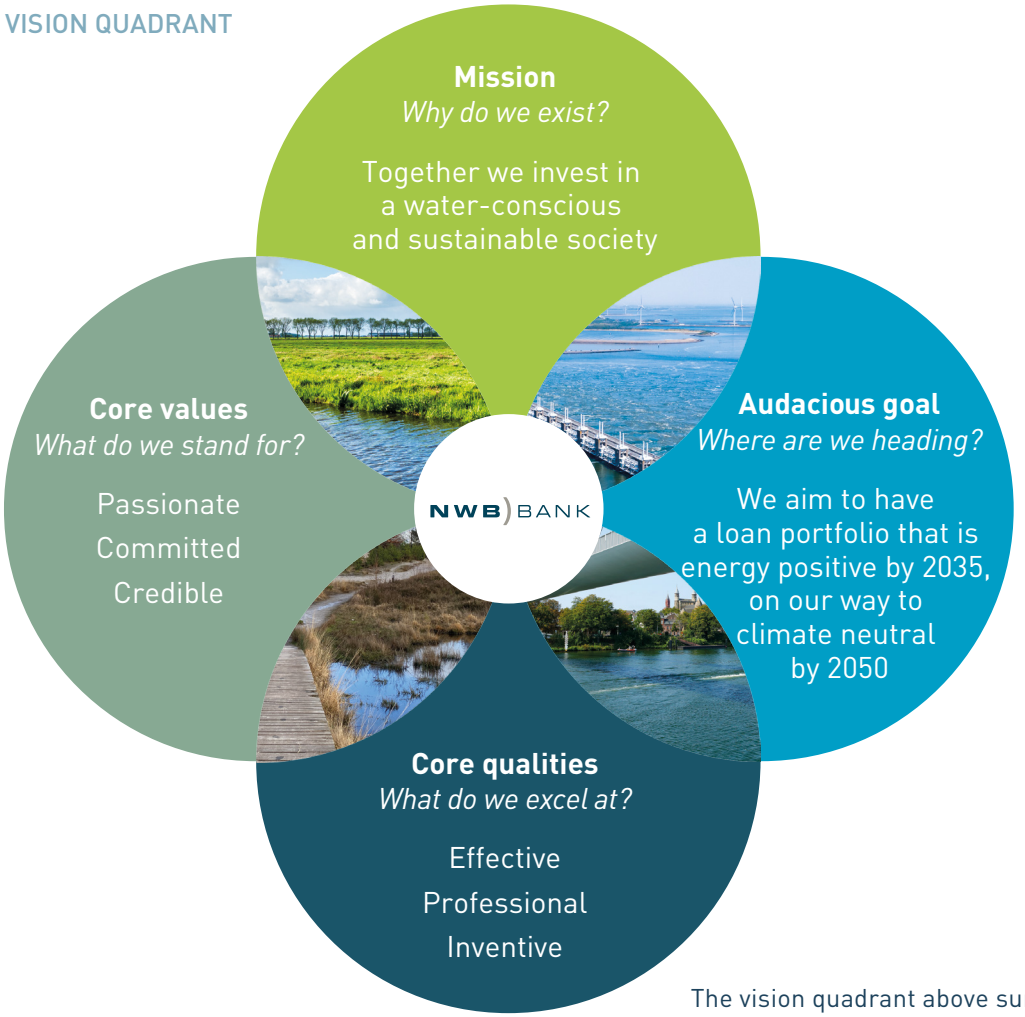
The desire for more decisive action

Climate change is dynamic, not static. What works in one country, or even one region, may not work in another. "That is why, as the European Commission, we prefer to provide guidelines and recommendations grounded in continuously evolving science, rather than impose one-size-fits-all legislation. This said, it is important that at the EU level we share an understanding of the probable climate scenarios for the longer term, and that we are equipped to manage the risks that come with it – building societal and economic *resilience by design*. It is then up to the Member States to design policies that reflect their specific circumstances." All stakeholders are therefore given a voice, ensuring that no one is taken by surprise. "We organise open consultations to test and validate proposals, taking the time to get things right rather than rushing new regulations. We listen carefully and learn from stakeholders to build the most complete picture possible. At the same time, public awareness of the need for resilience is growing, fuelled by the rise in climate-related disasters. Citizens are calling for more decisive action. This sense of urgency is also visible in the European Parliament, where support for resilience spans the political spectrum. It is an agenda that unites rather than divides. The European Union now has a historic opportunity to lead by example and show the world the way forward."

Together with our stakeholders, we are investing in a water-conscious and sustainable society. Our aim is to contribute to long-term ecological and societal goals. We primarily achieve this by offering our clients appropriate and favourable financing. This helps to keep the burden on citizens low and makes sustainability and physical safety in the Netherlands affordable.

MISSION VISION

VISION QUADRANT



The vision quadrant above summarises our purpose, values and areas of expertise. Part of this vision is our 'audacious goal', which encourages our employees to contribute to the energy transition and sustainability in the Netherlands.

STRATEGY AND VALUE CREATION

Introduction

De Nederlandse Waterschapsbank N.V. (NWB Bank) is a national promotional bank. Our activities contribute to achieving public policy objectives. Founded in 1954 by and for the water authorities, one year after the North Sea flood, the bank was established under the motto 'Never again'. Soon afterwards, we began financing the broader Dutch public sector in addition to the water authorities. As a significant bank, we are directly supervised by the European Central Bank.

Strategy [ESRS]

In consultation with the Supervisory Board and stakeholders, we developed our medium-term strategy in 2018: 'The sustainable water bank'. Initially, targets were set for the period 2019-2023. Following a mid-term review in 2021, we concluded that the strategy was working and implementation was on track, so these were extended to 2026. The strategic targets will be reviewed again in 2026.

Value Creation Model [ESRS]

The value that NWB Bank, as a 'sustainable water bank' adds to society, and the process underlying it, is captured in our value creation model.

- **Input** relates to the specific qualities and types of capital we use to create value.
- **Business model** centres on our mission, strategic pillars and stakeholders.
- **Output**: as a bank of and for the public sector, we have one core task: providing appropriate financing on the most favourable possible terms.
- **Outcome** concerns the direct impact of the financing we provide (the Output). We have organised this according to the five components of our strategy: the three pillars, the foundation and the keystone.
- **Impact** examines the added value our clients create for society through our financing. We have linked this to the six United Nations Sustainable Development Goals (SDGs) on which we have the greatest impact.

VALUE CREATION MODEL

INPUT

Financial capital
- Strongly capitalised
- Low-cost funding
- High degree of creditworthiness
- Significant size

Social and relational capital
- National promotional bank in all relevant networks

Human and intellectual capital
- Committed, knowledgeable and motivated employees
- Balanced and diversified workforce

Organisational capital
- Professional and cost-conscious organisation
- Strong, transparent and ethical governance structure
- Moderate remuneration policy

Natural capital
- Energy-efficient and water-conscious operations

BUSINESS MODEL

Mission

Together we invest in a water-conscious and sustainable society



Our stakeholders

Shareholders | Clients | Employees

Industry organisations | Investors | Regulators | Government | Nature and environment (silent)

OUTPUT

WATER AUTHORITIES
€459 MILLION

DRINKING WATER COMPANIES
€135 MILLION

HOUSING ASSOCIATIONS
€8.2 BILLION

MUNICIPALITIES AND JOINT MUNICIPAL SCHEMES
€736 MILLION

HEALTHCARE INSTITUTIONS
€118 MILLION

LOANS WITH GOVERNMENT GUARANTEE
€42 MILLION

OTHER
€302 MILLION

RENEWABLE ENERGY
€227 MILLION

GRID OPERATORS
€372 MILLION

NHG RMBS
€495 MILLION

CET1-RATIO
36.8%

LEVERAGE RATIO
39.2%

COST/INCOME RATIO
26.9%

CO_2E EMISSIONS
1,419 kton

NUMBER OF EMPLOYEES
172

NET PROFIT
€113 MILLION

PAYOUT RATIO
47%

OUTCOME

The bank of and for the public water sector. We facilitate vital investments in flood protection, water management and the supply of drinking water, thereby strengthening the Netherlands' climate resilience, water quality and nature. **First SLL drinking water company** See page 40

A key player in financing the public sector. We lower the costs of public tasks. We enable our clients to make their real estate more sustainable, keep social rents affordable, and carry out their public tasks efficiently by providing continuity and stability of financing. We finance one in three social rental homes See page 50

Financing partner for enhancing sustainability in the Netherlands. We finance sustainable energy projects and infrastructure that are vital for the energy transition, including district heating networks and regional grid operators. By doing so, we are making a significant contribution to ensuring the energy transition in the Netherlands is affordable, while also demonstrating our commitment to the Climate Agreement. 6,999 TJ renewable energy generated See page 65

Sustainable, efficient and socially engaged organisation. We are a stable and safe bank. This stability is reflected in our capital and liquidity ratios and our credit and ESG ratings. It is important to keep investing in knowledge, personnel and systems. At the same time, we try to keep our costs under control and maintain the lowest possible cost/income ratio. 34.6% achieved reduction tonnes CO_2e/€ million compared to 2018 | absenteeism rate: short term 0.5%/ long term 3.4% See page 31

Responsible returns and social impact. We deliver impact while maintaining financial solidity. Our aim is not to maximise profit. We contribute to climate adaptation and mitigation, as well as to water and biodiversity. However, our societal impact goes beyond that: we also closely examine the societal impact we achieve through our lending. ROE 5.3% See page 28

IMPACT

Climate adaptation, climate mitigation and energy

Water management and biodiversity and ecosystems

Social housing



We are *the* bank of and for the public water sector

We are *the* bank of and for the public water sector. That is our first strategic pillar. Our bank is the water authorities' primary financial service provider, and in financing these shareholders, we aim to maximise our market share. By providing appropriate financing at the lowest possible cost, we help the water authorities in their tasks of flood protection, water management and water quality. To finance lending to the water authorities, we issue designated Water Bonds (Green Bonds).

Drinking water companies have also traditionally been one of our important clients. Financing these clients ideally fits the profile of 'the sustainable water bank'. Drinking water companies' main task is to provide consumers and businesses with high-quality, sufficient drinking water, and to ensure they can do so in the future, they invest in environmental management. We want to expand our lending to this sector where possible.



We are a key player in financing the public sector

Pillar 2 of our strategy is that we are a key player in financing the Dutch public sector. We also finance municipalities and provinces, as well as institutions backed by a (local) government guarantee, such as housing associations, healthcare institutions and educational institutions, with the financing they need on the best possible terms. In terms of outstanding debt, the social housing sector is the largest within the Dutch public sector and, accordingly, our largest client group by volume. To extend our impact in this sector, we issue so-called Social Bonds and use the proceeds to finance housing associations. We thus help keep social rents at affordable levels and improve the sustainability of the housing associations' housing stock.

Over the past 10 years, we have provided almost €85 billion in long-term loans. We aim to maintain our substantial market share in financing the Dutch public sector and, with total assets of almost €73 billion, we are a major player in the Dutch banking industry. Our organisation helps to ensure a financially sound, social and innovative playing field in which public funds are used efficiently and effectively.

Our lending policy and product range is designed to meet the changing needs of the Dutch public sector. For example, we lend to public-private partnership projects and we invest in NHG RMBS bonds (based on securitised residential mortgages covered by a National Mortgage Guarantee). We have also adopted a policy of lending to public-sector clients with relatively small borrowing requirements – such as amateur sports clubs (whose borrowing is covered by a municipal guarantee). The small scale of such lending makes it difficult to assist this type of client on a cost-efficient basis. The amount of time it takes to analyse both the sector as a whole and the individual client is often disproportionate to the size of the loan. If we had to factor in all the costs of conducting a thorough analysis as a surcharge on the loan cost, it would increase the interest on these loans. However, in the light of our societal role, we have decided against doing this to ensure that we can also provide these small-scale clients with appropriate finance on the best possible terms.



We are a financing partner for enhancing sustainability in the Netherlands

Pillar 3 is being a financing partner for enhancing sustainability in the Netherlands. We finance renewable energy projects and infrastructure projects that are crucial to the energy transition, such as district heating networks and regional grid operators. Government institutions and projects that have received a subsidy under the Renewable Energy Production Incentive Scheme (SDE+) can apply to us for project financing.

This includes solar energy, wind energy and aquathermal energy projects. In this way, we make an important contribution to an affordable energy transition in the Netherlands and fulfil our commitment to implement the Paris Agreement.



Our foundation: sustainable, efficient and a socially engaged organisation

The foundation of our strategy is that we are a sustainable, efficient and socially engaged organisation. We are a cost-efficient and highly capitalised bank (on a risk-weighted basis) operating under the direct supervision of the European Central Bank. While the diversification of our loan portfolio and the increasing demands being placed on banks require further investments in knowledge, staff and systems, with our workforce of around 180 staff, we remain a highly cost-efficient organisation.

As a bank of and for the public sector, we are highly aware of our own social responsibility. Keen as we are to set a good example, we are taking action to improve the sustainability of our own business operations.



The keystone: responsible returns and societal impact

'Responsible returns and societal impact' are the final elements of our strategy. As a promotional bank, we do not seek to maximise our profits, although it is important to generate a reasonable level of profit to achieve our objectives and distribute an appropriate dividend.

Every year, we set a benchmark target return on equity in consultation with our shareholders and focus on the social return of our lending activities, which is ultimately what it is all about. In doing so, we place a strong emphasis on the climate impact of our loans, but our societal impact extends even further. It is also about the impact on biodiversity, social well-being, circularity and nature-inclusive solutions. We have outlined our goals and ambitions in these areas in our ESG transition plan, which we published in 2024 as the successor to our 2022 Climate Action Plan.

OPPORTUNITIES AND RISKS

Our strategy is designed to ensure we maximise opportunities to deliver a responsible return and make a societal impact At the same time, we ensure that risks to our organisation are properly managed. In assessing opportunities and risks, we apply the concept of double materiality in line with the CSRD. According to this concept, important themes and topics are examined from two perspectives: first, the potential positive and negative impact of the organisation on people and the environment; and second, the financial impact of sustainability-related risks and opportunities on the organisation itself. The former is known as the inside-out perspective and the latter as the outside-in perspective.

In recent years, we have further increased transparency on (strategic) sustainability opportunities and risks (ESG). In reporting on these, we follow the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD) of the Financial Stability Board (FSB). We continue to develop this reporting each year, while further integrating ESG risks and opportunities into our activities. The implementation of the Corporate Sustainability Reporting Directive (CSRD) in 2024 is an important step in this process.

Opportunities

Financing sustainable energy projects is one example of an outside-in opportunity that we have seized to contribute to the energy transition in the Netherlands. These projects generally require substantial financing and have long repayment periods. Providing this type of long-term project financing at relatively low cost fits well with our role as a bank and enables us to contribute directly to reducing CO_2e emissions. It is simultaneously an example of inside-out.

We want to support all our clients in carrying out their sustainability initiatives. We typically provide balance sheet financing to many of our clients, including water authorities, drinking water companies, housing associations and local authorities. It is more difficult to exert any direct influence with this type of lending, however, as we are not financing a specific investment or project, but rather the client's overall financing needs. However, we do monitor our clients' progress in sustainability. To encourage clients to become more sustainable, we offer sustainability-linked loans (SLLs). With these loans, we agree on a set of sustainability performance indicators with clients in advance. Clients receive a discount on the interest rate if they meet these indicators. We consider these types of loans a strategic opportunity, just as we have been actively issuing ESG bonds since 2014. Sustainability is an important factor in all new loans and in assessing existing clients, not just SLLs.

Offering sustainability-linked loans is an important part of the ESG transition plan we presented in October 2024. A successor to our 2022 Climate action plan, it describes the steps we are taking to make a positive contribution to the climate, nature and society. The transition to a sustainable society requires an integrated approach as sustainability is much more than climate. Issues such as climate adaptation, mitigation, biodiversity, water management and circularity are closely interlinked. At the same time, sustainability can only be successful if it is also social and inclusive. We will ask our clients to develop action plans that address these issues, and we invite them to collaborate with each other and with us.

THE SUSTAINABLE WATER BANK: RESULTS IN 2025

We report on our bank's financial results and activities over the past year, in line with our strategy and value-creation model.

KEYSTONE

The keystone of our strategy is our commitment to 'responsible returns and societal impact'. While the Sustainability Statements discuss the societal impact of our lending in detail, this section primarily focuses on the financial results and responsible returns.

FOUNDATION

Next, we discuss the foundation of our strategy: our sustainable, efficient and socially engaged organisation. We explain what characterises our organisation and how we have operated over the past year. This also covers the different types of capital that are the inputs to our value creation model, including the funds we have raised on the international money and capital markets and our people. This section also highlights the key financial risks that form an important framework for our actions as a bank. The key themes of 'A safe, stable and efficient bank' and 'Our own people' are addressed in this section. We also look ahead to 2026.

PILLARS

Finally, we take a closer look at our strategic pillars: 'Bank of and for the public water sector', 'Key player in financing the Dutch public sector' and 'Financing partner for enhancing sustainability in the Netherlands'. The pillars all relate to the bank's lending, which we consider the main output of our value creation model. For each client group, we show the main trends and developments, the amount of financing we provided in 2025 and the size of our loan portfolio in this sector. We have also added an interview with a stakeholder and/or client. In the separate Sustainability Statements, we discuss our ESG impacts in more detail, based on our selected material topics and the CSRD standards.

"We deliver impact with financial solidity."



RESPONSIBLE RETURNS AND SOCIETAL IMPACT



NET PROFIT

€113 million



RESPONSIBLE RETURNS AND SOCIETAL IMPACT

As a bank of and for the public sector, we do not pursue profit maximisation. However, a sound level of profitability is necessary to ensure the continuity of our bank. We are one of the best-capitalised banks supervised by the European Central Bank in terms of risk weighting, and one of the most cost-efficient. At the same time, everything we do as a bank is aimed at generating societal impact. We seek to contribute to climate adaptation and mitigation, as well as biodiversity, but our societal impact extends beyond this. We also explicitly consider the societal impact of our lending. Our separate Sustainability Statements provide a detailed description of this impact; in this section, we focus on financial returns.

Responsible returns

In 2025, we again delivered a healthy profit of €113 million. This is higher than the previous year's profit of €94 million. This is largely due to a more positive result from financial transactions. This responsible return cannot be viewed in isolation from our efficiency as a bank, as our ratios also demonstrate. This is explained in more detail in the chapter 'Sustainable, efficient and socially engaged organisation'. Our new lending totalled €11.1 billion, bringing the total loan portfolio to €59.2 billion. This is explained in more detail under the three strategic pillars.

Net interest income amounted to €247 million, slightly lower than last year (€248 million in 2024). Although the increase in the loan portfolio led to higher interest income, net interest income was slightly lower than in the previous year due to increased costs of short-term financing through commercial paper issuance. Market interest rates, which were highly volatile again last year, had only a limited impact on our net interest income though. This is because we carefully hedge our interest rate risk.

The results from financial transactions last year was negative at €2.8 million compared with a negative result of €37 million in 2024. This change is mainly due to unrealised market value movements resulting from changes in the interest rate curve and credit spreads in the liquidity portfolio.

Operating expenses totalled €65 million last year, compared to €60 million in 2024, while the bank tax amounted to over €19 million. This increase is partly due to higher personnel costs, which rose from €28 million in 2024 to €30 million last year, driven not only by an increase in personnel but also by collective labour agreement (CLA) salary increases. ICT costs also increased partly as a result of this. In addition, we are investing in capacity, systems and knowledge in areas such as ESG and data. We regularly call on external consultants for various projects. The result from ordinary activities was €159 million, compared to €133 million in 2024.

Tax burden

The tax burden for 2025 amounted to €45.9 million, bringing the effective tax rate to 29.0%. Because we reported a leverage ratio of 24.0% at year-end 2024, we did not have to remit anything last year under the minimum capital rule for banks and insurers. This rule, also known as the 'thin cap rule,' limits the deductibility

of interest for corporate income tax purposes to the extent that a bank's leverage ratio is below 10.6%. The bank tax in 2025 amounted €19.4 million. In early 2025, the Single Resolution Board (SRB) indicated that the resolution fund's target capital remained reached, as was also for 2024. This means that we did not need to make a resolution contribution in 2025.

After paying ordinary taxes, we achieved a net profit of €113 million. This equates to a return on equity of 5.3% (2024: 4.5%). We have agreed on a benchmark return on equity with our shareholders. For 2025, this was 3%, meaning we more than met the benchmark return.

Determining the amount available for dividend payment is an annual discretionary power of the Managing Board, with the required approval of the Supervisory Board. This decision-making process takes into account the continuity of the bank, as well as the interests of shareholders and other stakeholders. For the 2025 financial year, the Managing Board, with the Supervisory Board's approval, set the profit available for the distribution of dividends at €53 million. The payout ratio is 47% of profit (2024: 54%).

"We combine talent and commitment to create real impact."



SUSTAINABLE, EFFICIENT AND SOCIALLY ENGAGED ORGANISATION



NUMBER OF EMPLOYEES

172

ESG TOPICS

- Our own workforce
- Safe, stable and efficient bank



SUSTAINABLE, EFFICIENT AND SOCIALLY ENGAGED ORGANISATION

We can only fulfil our role in financing the Dutch public sector if we are well-equipped as an organisation. This is the foundation of our strategy. Our employees are motivated and qualified to serve the public cause in their own individual way and we also lead by example in terms of sustainability and social engagement.

The strength of our organisation lies in large part in its compact and transparent organisational structure. Although we grew substantially again last year – from 145 employees at the end of 2024 to 172 at the end of 2025 – we aim to preserve this as much as possible. The growth in staff numbers last year is the result of our ambitions in sustainability, the further diversification of our lending activities, and ongoing investment in becoming a more professional and effective organisation.

Safe, stable and efficient bank

In 2025, NWB Bank was in the top 10 of the world's safest banks, ranked sixth. This stability is reflected in our capital and liquidity ratios and our high credit and ESG ratings. It is important to continue investing in knowledge, staff, digitalisation and systems, not least in response to new legislation and supervisory requirements. This demands considerable attention from the organisation. At the same time, we try to keep our costs under control and maintain the lowest possible cost/income ratio.

Capital ratios

Our bank's Tier 1 equity capital, including hybrid capital, amounted to €2,349 million at the end of 2025, up from €2,299 million at the end of 2024. The level of risk-weighted assets stood at €5,490 million, up from €5,550 million at the end of 2024. Risk-weighted assets decreased slightly due to the transfer of part of the existing, bilateral derivatives position to central clearing. This resulted in an increase in our capital ratios. The Tier 1 ratio stood at 42.8% at the end of 2025, up from 41.4% at the end of 2024, and the Tier 1 capital ratio (CET1) was 36.8% at the end of last year, up from 35.7% at the end of 2024.

Capital requirement

The capital ratios are well above the minimum requirements. The total SREP capital requirement for our bank is now 10.25%, comprising the Pillar 1 capital requirement of 8.00% and the Pillar 2 capital requirement of 2.25%. The required capital conservation buffer of 2.50% and the countercyclical capital buffer of 1.96% bring the total capital requirement for NWB Bank to 14,71%.

Leverage ratio

The leverage ratio, unlike the Tier 1 and CET1 ratios, is risk-unweighted and derived from the capital requirements under Basel III. This means that its calculation does not take into account the risk profile (expressed as a risk weighting) of a bank's assets. The leverage ratio is defined in the European Capital Regulation CRR II, which entered into force on 1 January 2025. Since CRR II in 2019, we, like other promotional banks, have been permitted to exclude our public sector lending from the leverage ratio calculation. As of 31 December 2025, our leverage ratio was 39.2%. This is materially higher than the 24.0% ratio published at the end of 2024 and thus well above the 3% minimum requirement. Even if we do not adjust the leverage ratio

for our promotional assets, we met the 3% minimum requirement at the end of 2025 with 3.5%.

Liquidity ratios

The purpose of the liquidity coverage ratio (LCR) is to ensure that institutions hold sufficient liquid assets to withstand any net liquidity outflow under severe stress conditions over a 30-day period. Our organisation's LCR at the end of 2025 stood at 235% (2024: 183%), well above the minimum regulatory requirement of 100%.

For NWB Bank, the Net Stable Funding Ratio (NSFR) at year-end 2025 was 148% (2024: 134%). This was also well above the minimum regulatory requirement of 100%. The NSFR is also a liquidity ratio and focuses on stability of funding in the longer term. The internal liquidity requirements are determined in part through the internal liquidity adequacy assessment process (ILAAP), and we again comfortably met these requirements last year.

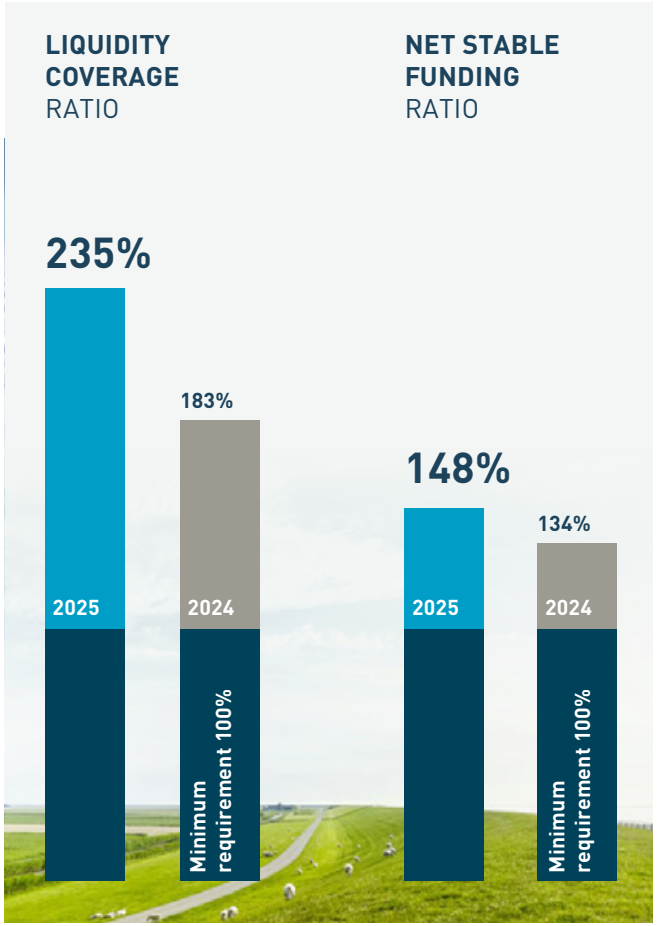
Credit ratings

Maintaining our organisation's high-quality credit profile, as reflected in our credit ratings, is a priority of our long-term strategy. To serve our clients optimally, it is important that our credit ratings be, and remain, in line with those of the State of the Netherlands. For years, we have enjoyed the highest credit ratings from Standard & Poor's and Moody's: AAA/Aaa.

ESG ratings

We also aspire to a high-quality rating profile in terms of sustainability. Our sustainability policy and its application are assessed by several ESG rating agencies. On their own initiative, Sustainalytics, ISS ESG and MSCI ESG Research provide NWB Bank with ESG ratings. The agencies issue ratings or scores based on their own ESG assessment framework. Further information on this can be found on their respective websites. While there is not yet full harmonisation of assessments by these agencies, our ESG ratings place us at the top of our peer group. Further harmonisation took place in 2025, bringing us one step closer to achieving the top ESG rating in our peer group across all ESG rating agencies. In general, we have strong sustainability ratings and want to further improve them where possible.





Laws, regulations and supervision

Laws and regulations are increasing both in volume and complexity. Examples include capital requirements and directives, the CSRD and EU Taxonomy, the Digital Operational Resilience Act (DORA), and the various guidelines issued by the European Banking Authority (EBA), including those related to subcontracting and ESG risk management.

ESG bonds

The vast majority of our funding from international money and capital markets is raised through the issuance of bonds and commercial paper. As a sustainable bank for the public sector, ESG bonds have become an indispensable part of our business operations. In addition to traditional investment considerations, such as investment safety and risk-adjusted returns, investors purchase these bonds because they want to support climate-friendly and societal projects within their investment mandates. By issuing ESG bonds, we continue to attract new investors and increase the market reach for these bonds. The issuance of these bonds underscores our role as a robust and sustainable financial partner for the Dutch public sector.

Despite volatility in the capital market, NWB Bank raised €10.9 billion in funding in 2025, of which €4.1 billion was raised through ESG bonds. In 2025, we updated our framework from SDG Housing Bonds to Social Bonds. We issued €1.0 billion in Water Bonds to support water authorities and €3.1 billion in Social Bonds to finance social housing in the Netherlands. By the end of 2025, we had more than €26.2 billion of ESG bonds outstanding. This represented 43% of our total outstanding long-term funding at that time. We are and will remain a leading international issuer of ESG bonds within the Sovereigns, Supranationals and Agencies (SSA) group. In the Netherlands, we remain one of the largest issuers of ESG bonds.

We can fund ourselves as a bank on very favourable terms because of our safe risk profile, underpinned by AAA/Aaa ratings equal to those of the State of the Netherlands. We use the long-term funding we raise through bond issuances to both finance new lending and refinance maturing loans. The average maturity of the funding raised last year was 4.5 years (2024: 5.1 years).

TOTAL BONDS ISSUED

€ 61.4 billion



- ESG-bonds* **26.2** billion
- Other bonds **35.2** billion

* 43% of total bonds issued

BONDS ISSUED IN 2025

€ 10.9 billion

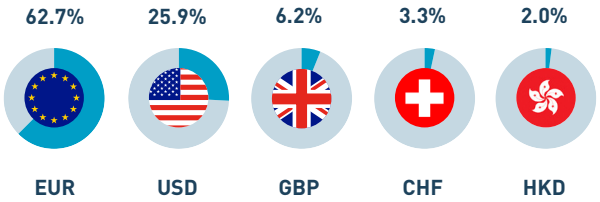


- ESG bonds* **4.1** billion
- Water Bonds **1.0** billion
- Social Bonds **3.1** billion
- Other bonds **6.8** billion

* 38% of total issued bonds in 2025



FUNDING RAISED BY CURRENCY



Money market financing

To raise short-term funds, we primarily use commercial paper (CP). We have two programmes for this: a US Commercial Paper (USCP) programme and a Euro Commercial Paper (ECP) programme. Last year, we raised €226.0 billion in CP, 49% of which was under the USCP programme, representing €111.6 billion (2024: €118.1 billion) compared to €114.4 billion (2024: €104.9 billion) under the ECP programme. These figures are cumulative; maturing CP was refinanced during the year. The outstanding CP amount at the end of 2025 was €2.1 billion (2024: €5.6 billion). The average maturity of the USCP was 16 days (2024: 20 days), and that of the ECP was 24 days (2024: 42 days).

We use the short-term funds raised through our CP programmes to provide short-term loans to our clients, to increase our liquidity buffer, and for collateral obligations arising from our derivative activities as a bank to hedge our interest rate and currency exposures. In addition to the commercial paper market, which deals in tradable debt instruments with maturities of up to one year, we are also active in issuing short-term US dollar bonds with maturities of up to two years. These bonds, issued under our Medium Term Note programme, partially replace the issuance of commercial paper. They allow us to lock in favourable interest rates for a longer period.

Our own employees

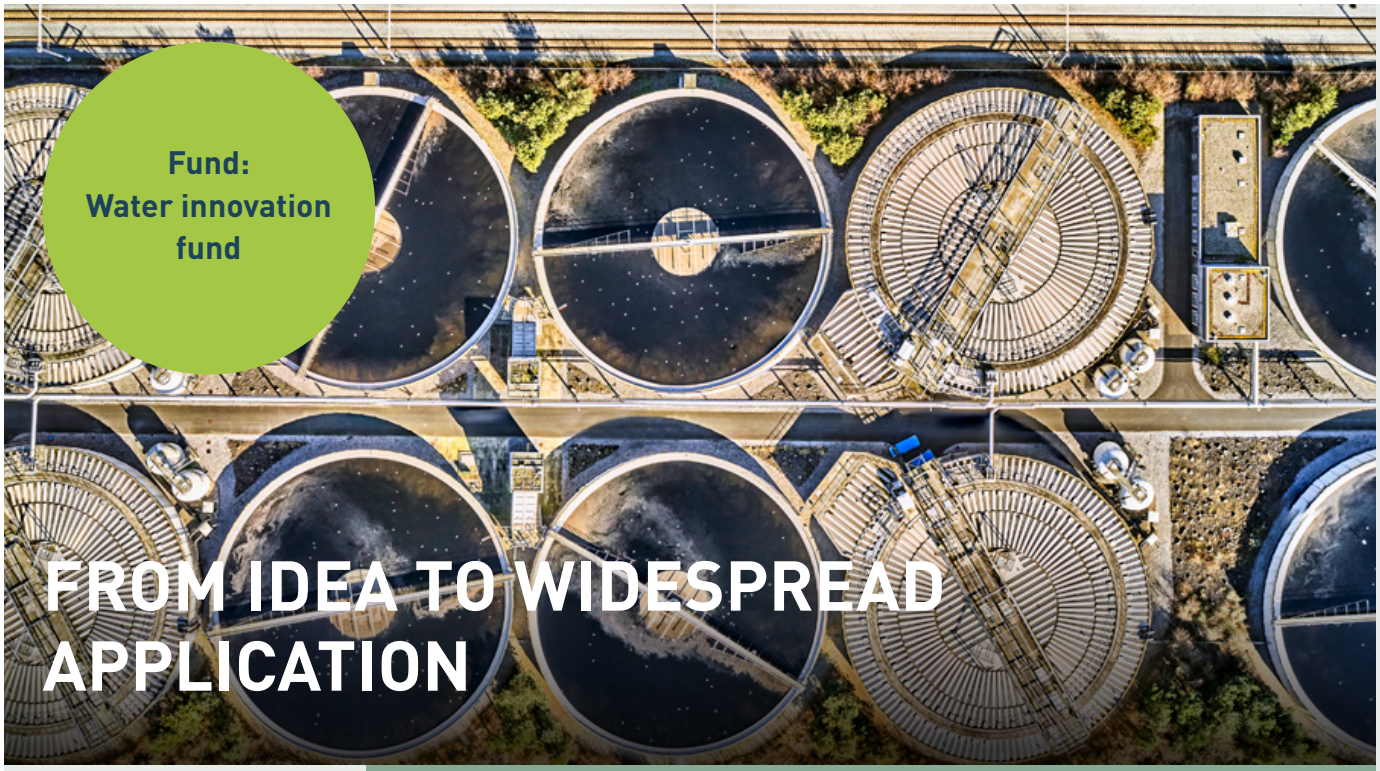
Given the growth in our workforce in recent years, we are now focusing on stabilisation. At the end of 2024, we had 145 employees, despite a budgeted workforce of 175. By the end of 2025, this figure had increased to 172, with a slight increase in the budgeted workforce to 180.5. We expect and intend that the organisation's growth will remain limited in 2026, as evidenced by the strategic personnel planning we carried out last year.

Attracting and retaining qualified and motivated employees is a key focus area. In 2025, we introduced a job classification system to promote transparency, support employee performance reviews, and provide insight into career opportunities. When recruiting employees, we are open to everyone, regardless of gender, age, beliefs, cultural background, disability or sexual orientation. We strive for a good mix of talent, development potential and expertise among employees and hire professionals who enhance our diversity. We are a participant in the CLA for the Dutch banking industry, the first CLA to include the SER Diversity in Business Charter, which we signed in 2023.

Given the organisation's growth in recent years, we pay particular attention to fostering connections and ensuring everyone is involved in the mission and strategy, as reflected in our internal goals. These include the annual Together NWB Bank days and the NWB Town Hall meetings. We also invest heavily in developing our people, providing a generous training budget. Managers work on individual development themes based on 360-degree feedback. In 2024, we completed a development programme for team leads and continued it in 2025, tailoring it to individual development themes. Further information can be found in the **Our own employees** section of the Sustainability Statements.

OUTLOOK FOR 2026

In 2026, we will continue to provide the Dutch public sector with financing that is appropriate and as affordable as possible in a socially responsible and sustainable manner. We expect that demand for credit from water authorities, drinking water companies, and housing associations, in particular, will grow in the coming years due to the major transition challenges they face. We therefore expect our loan portfolio to continue to grow, which will positively impact net interest income. In view of geopolitical developments and their impact on the money and capital markets, higher operating expenses and the heavy tax burden, we are cautious in our forecast for net profit in 2026.



Fund:
Water innovation fund

FROM IDEA TO WIDESPREAD APPLICATION

Climate change poses considerable challenges for water authorities in their efforts to continue providing safe, clean surface water. To meet these challenges, there is a great need for innovation in water management. "Innovation initiatives may be eligible for financing from the NWB Water Innovation Fund to accelerate sustainability in the Netherlands."

"We need to use water more sparingly and focus on reuse"

Riksta Zwart is speaking. She, Stefan Kuks and Pieter Janssen form the board of this fund. All three are experienced administrators in the water sector and have been involved from the beginning. Established by NWB Bank in 2021, the Water Innovation Fund finances innovative, sustainable projects by water authorities or consortia, including companies. These projects are ready for upscaling, large-scale demonstration and market introduction (minimum TRL 7). Riksta enthusiastically explains why the fund was created: "Many good ideas for sustainable water management arise within the water sector. Solutions focus on climate adaptation, energy savings and the reuse of residual materials, for example. However, it often proves difficult to develop these ideas further. Many initiatives stall after the pilot phase. Scaling up and making solutions widely applicable is risky and requires greater investment, making it difficult to secure financing. With the fund, we can support projects so they can continue to develop."

"We also hope to attract projects with a wide reach across the water chain"

Critical eye

To be eligible for funding, applications must meet several conditions. When the fund was launched, the board carefully considered these criteria. After all, how do you ensure that an innovation benefits society and that the fund supports only projects that genuinely need it? These discussions resulted in clear criteria. For example, at least one water authority must be involved in the project and contribute financially, and the innovation must be widely applicable.

Although NWB Bank established the fund, it operates independently and assesses funding applications itself. Once an application is submitted, it is reviewed against the fund's objectives and criteria. The National Green Fund manages the fund. STOWA, the knowledge centre for regional water managers, took over this role in May 2025 and remains closely involved as an advisor during the assessment process. Riksta sees strong collaboration between the partners. She expects the cooperation with the Green Fund to pave the way for supporting even more impactful projects. "We are currently supporting several excellent technological projects, but we would like to expand our portfolio to include other types of initiatives as well. The Green Fund manages several funds, and through our joint network, we can reach a wider audience. We also hope to attract projects where innovation has a broad impact across the water chain. For instance, there are already some promising initiatives across the country that supply treated sewage water to industry and agriculture, thereby alleviating pressure on drinking water sources during dry periods. Innovations that focus on the entire chain are particularly interesting from the perspective of the fund's objectives."

Green raw materials

The NWB Water Innovation Fund currently supports several projects that process sludge remaining after wastewater treatment. Smart technologies give this sludge a new life as green raw materials, such as biogas and sustainable plastics. Water authorities and market parties are working together to further develop these promising circular solutions.

Riksta sees a growing willingness within the water sector to move forward together. The flywheel of innovation has started to turn, and she is pleased that more and more organisations are becoming familiar with the fund. "NWB Bank, the initiator, can be proud," she concludes. "It's great that the organisation organisation was willing to take a risk to support start-up projects and gave us the trust to implement them properly. Stefan, Pieter and I share the same drive to promote sustainable initiatives and hope to take further steps with the fund again this year."



Fund: NWB Fund

NWB FUND PLEASED WITH GOOD HARVEST YEAR

Core capital
€20.5 million

Available annually
€800,000

The NWB Fund co-finances international cooperation projects carried out by Dutch water authorities. This support is increasingly important as climate change places increasing pressure on water management systems worldwide. Programme manager Marion Wierda looks back on a successful year.

In Ghana, Indonesia, Peru, Vietnam and many other countries, employees of Dutch water authorities are contributing their expertise to water management projects. Working alongside local organisations, they are involved in initiatives ranging from wastewater treatment and rainwater harvesting to coastal protection and reforestation. Reflecting on the past year, Marion describes 2025 as exceptionally productive. "It was truly a bumper year," she says. "Our efforts have led to a range of tangible improvements. This work not only supports better local water management but also gives us valuable insight into the challenges we face in the Netherlands."

To illustrate this, she points to projects in Ghana and South Africa, both of which made significant progress last year. Along the coast of Ghana, plans are underway to construct a sand motor, an artificial peninsula designed to prevent large stretches of coastline from being lost to the sea. "Several metres of land have already been washed away," Marion explains. "The sand motor offers an effective solution and makes optimal use of local, natural materials."

A very different type of innovation is benefiting farmers in South Africa. As part of a pilot project, a group of farmers has begun using a weather information system that provides insights into upcoming weather conditions and their potential impact on agriculture. This enables them to prepare in advance for extreme weather events. With funding from the NWB Fund, a test model was developed

About the NWB Fund

NWB Bank established the NWB Fund in 2006 to help improve global water management in cooperation with the Dutch water authorities. More information can be found at www.nwbfonds.nl

Since 2018, the Blue Deal programme has also been supporting larger international water projects. The NWB Fund works with this programme to achieve the greatest possible impact in partner countries.



that clearly demonstrated the system's potential. "This is just the first step," Marion says. "It will be followed by a large-scale project financed by Invest International, significantly expanding its reach."

Learning to improvise

Working on projects abroad also requires a different set of skills and knowledge. This insight led the NWB Fund to establish the KIWI programme, a two-year training course designed to prepare water authority employees for international assignments. A third group has recently begun the programme. "This time, the training is being delivered by the Water Academy Foundation," Marion explains. "With input from the NWB Fund, an updated and innovative programme has been developed, incorporating lessons learned from earlier editions. Compared with previous rounds, the current programme places greater emphasis on business awareness and personal development. Participants receive training in areas such as improvising in unexpected situations and developing skills that are equally valuable in their work in the Netherlands."

A pioneering role

"The training programme is not the only way we develop and share knowledge," Marion continues. "We also organise so-called focal points: thematic groups that focus on issues we consider particularly important." She speaks enthusiastically about the themes these groups address. "In water management, steel and concrete have traditionally been widely used. But in many cases, there are more sustainable alternatives based on natural materials. The sand motor is one example; planting trees to prevent erosion is another. The nature-based solutions focal point is dedicated to promoting this approach. We have also launched a social inclusion theme group, as water-related challenges disproportionately affect vulnerable people and their communities. It is therefore important to involve them as partners in devising solutions. We want to draw attention to that as well." According to Marion, the focal points are an effective tool for achieving this. "Participants in these groups play a pioneering role. They exchange practical examples and insights, act as a sounding board for colleagues, and provide advice on submitting project proposals."

Carbon credits and blue bonds

Through these initiatives, the NWB Fund aims to promote innovation in various ways, both internationally and in the Netherlands. Marion could speak at length about international water management and the many examples of effective cooperation worldwide. Looking ahead, she emphasises that the fund will remain fully committed to supporting these projects financially. At the same time, it will increasingly collaborate with other financing partners, who can help scale up initiatives once the Fund has provided the initial impetus. "We also want to be a driving force in the use of sustainable financing instruments such as carbon credits and blue bonds. Reforestation projects in Ghana and Peru are already benefiting from this approach." There is still much work to be done, Marion concludes, before turning her attention to the fund's ambitious plans for the future.

"We support water authorities with appropriate, affordable financing for vital investments."



BANK OF AND FOR THE PUBLIC WATER SECTOR



TOTAL LOANS PROVIDED

€594 million

ESG TOPICS

- Climate adaptation
- Water management
- Biodiversity and ecosystems



BANK OF AND FOR THE PUBLIC WATER SECTOR

The public water sector plays a vital role in society. However, climate change and increasingly extreme weather conditions are making the management and protection of our water system more challenging. Heavy rainfall is becoming more frequent, with longer periods of precipitation, while sea levels are rising steadily. Water authorities ensure that our surface water remains safe, clean, and fit for the future, while drinking water companies are responsible for reliably supplying sufficient, high-quality drinking water. We support both sectors by providing access to appropriate financing on the most favourable terms possible, enabling them to continue performing their societal tasks effectively.

Water authorities

Water authorities experience the impact of climate change on a daily basis. To cope with more extreme rainfall, prolonged droughts and rising sea levels, they are investing heavily in adapting and making their infrastructure more sustainable. In doing so, they focus not only on water safety and water quality, but also on strengthening biodiversity and ecological values within the water system. As a sustainable water bank, we fully support these efforts. We ensure that water authorities have access to appropriate financing on the most favourable terms possible, so that they can continue to perform their tasks effectively. The work of the water authorities is capital-intensive, with investment needs expected to rise to an average of €3.1 billion per year in the coming years. This will also increase the demand for financing, although investments in 2025 fell somewhat short of expectations. In 2025, we provided the water authorities with approximately €460 million in long-term loans (2024: €750 million). By the end of 2025, we had almost €8.6 billion in outstanding financing with the water authorities. This figure was €8.5 billion at the end of 2024.

It is crucial for water authorities to organise their financing and investments in a sound and sustainable manner. As investment requirements rise sharply, the debt levels of some water authorities are already quite high. At the same time, additional investments are unavoidable in order to comply with stricter European requirements and to make the water system more resilient to extreme weather conditions. This requires striking a careful balance between necessary tariff increases and responsible debt management.

Climate neutral by 2035

The Dutch water authorities aim to be climate neutral by 2035, which is more ambitious than the Paris climate targets. In their joint vision document *Towards climate neutrality*, the 21 water authorities have set out this commitment and indicated that the sector will map its climate footprint with increasing accuracy. This includes their own emissions, such as nitrous oxide and methane from wastewater treatment plants, as well as emissions from organisations working on their behalf. They also aim to reduce greenhouse gas emissions from areas under their management, including peatlands, aquatic sediments and surface waters. An important intermediate step is the previously agreed target of energy neutrality, under which the sector aims to generate as much renewable energy as it consumes from 2025 onwards.

To achieve this, the water authorities are focusing on saving energy and generating renewable energy from their own sources, such as biogas from sewage sludge, solar and wind energy, and innovative applications such as green hydrogen. The more than 300 wastewater treatment plants are increasingly developing into local energy hubs. Aquathermal energy is also emerging as a promising sustainable heat source. The water authorities' 2024 Climate Monitor shows that sustainable energy generation accounted for 66.4% of total energy consumption that year. Although the water authorities are making good progress towards climate neutrality, achieving full energy neutrality by 2025 is proving challenging. Increased energy demand, grid congestion and negative electricity prices are putting pressure on this ambition.

Sustainable impact of water authorities

We have calculated the carbon footprint for 100% of our loans to the water authorities to be 528 kilotonnes of CO_2-equivalent in 2024[1] (2023: 512 kilotonnes of CO_2-equivalent). This corresponds to an emission intensity of 59.0 tonnes of CO_2-equivalent per €1 million (2023: 61.2 tonnes of CO_2-equivalent per €1 million). After years of a sharp decline in the water authorities' climate impact, the most recent progress is somewhat disappointing. Both the absolute climate impact in tonnes of CO_2e and the relative climate impact in tonnes of CO_2e per €1 million financed decreased slightly in 2024 compared to the previous year. The increase in absolute climate impact is therefore mainly due to increased financing.

The sector does still operate in line with the climate impact reduction path set out in our ESG transition plan. Water authorities face significant challenges in the coming years, necessitating continued attention to stay on course. Client meetings in 2025 confirmed water authorities' commitment to developing the sector in a robust and responsible way. We also analysed their climate impact reduction targets and it stands out that the sector – through the umbrella organisation, the Association of Dutch Water Authorities (UvW) – has a clear target with detailed plans to achieve it. However, water authorities sometimes communicate urgency in different ways, and some lack reporting on progress. We will discuss this further with the water authorities in 2026.

Drinking water companies

Drinking water companies have traditionally been clients of ours. Their task of providing consumers and other clients with sufficient quantities of high-quality drinking water is set out in the Drinking Water Act. The Drinking Water Act precludes the privatisation of drinking water companies, making them integral to the public sector. The Act also protects drinking water activities and regulates the tariffs and related capital costs. The legal requirements and standards for drinking water are laid down in the Drinking Water Decree. This also includes the standards to be met by groundwater and surface water. In addition to providing drinking water, drinking water companies often also supply industrial water.

In 2025, we provided €135 million in long-term financing to drinking water companies (2024: €361 million). We managed to stabilise our market share in this sector with 33.4% (2024: 35.1%). The total volume of our outstanding financing to drinking water companies at the end of 2025 was €1,433 million (2024: €1,445 million).

Greater demand, fewer resources

Drinking water companies are facing major challenges. Demand for drinking water is increasing, while the availability and quality of drinking water sources are declining. The decline in drinking water sources is due to drought and salinisation caused by climate change, and the decline in drinking water quality due to emerging substances such as PFAS, pyrazole, pharmaceutical residues and micro-organisms. At the same time, demand for drinking water is increasing due to population growth, climate change and economic developments. In addition, developments in cybersecurity, the energy transition, and the increasing use of land and subsoil require attention.

1) Note: in calculating climate impact, we use the loan portfolio from theprevious year due to the availability of relevant data. Therefore, inthe 2025 Annual Report, we report on the climate impact of the loanportfolio as it was at the end of 2024.

To secure the future of drinking water supplies, drinking water companies expect a sharp increase in investment in drinking water infrastructure and nature management in the coming years. They will finance these investments with revenues from the supply of drinking water, but will also seek external financing, including from our bank. To accommodate the drinking water companies, the Ministry of Infrastructure and Water Management increased the regulated maximum weighted average cost of capital (WACC) for 2025-2027. This helps drinking water companies generate higher returns while strengthening their financial position and creditworthiness.

Sustainable impact of drinking water companies

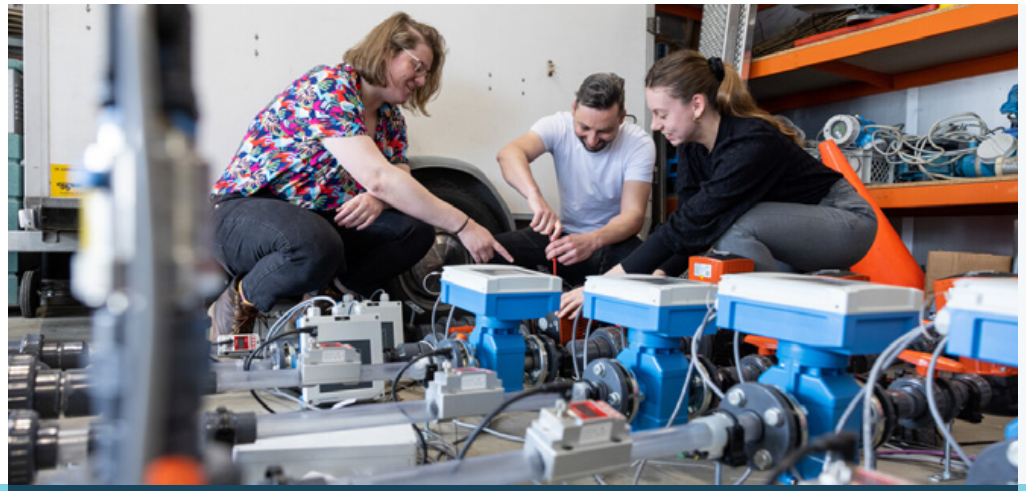
We gained a key insight into the climate footprint for 99% of our loans to drinking water companies, which in 2024 was 48 kilotonnes of CO_2-equivalent (2023: 35 kilotonnes CO_2-equivalent). This corresponds to an emission intensity of 33.7 tonnes of CO_2-equivalent per €1 million (2022: 29.5 tonnes of CO_2-equivalent per €1 million).

Both the absolute and the relative impact of financing the drinking water companies therefore increased in 2024. The main cause is increased electricity consumption. The sector is no longer operating fully in line with the climate impact reduction pathway set out in our ESG transition plan. We will engage with the sector more explicitly on this. We note that water companies are aware of their impact, although in some cases, reduction targets could be better. In public policy documents and reports, we see significant differences in the transparency of drinking water companies regarding their climate impacts and mitigation actions. A sector-wide approach, including plans and monitoring, may offer a solution. All drinking water companies will need more production capacity in the coming years, while undesirable substances in drinking water sources and rainfall shortages are increasing. This makes the challenge of reducing material consumption and climate impact even greater. Water awareness in the Netherlands needs to improve, and the drinking water sector also has an important role to play in this.

In 2025, we entered into a sustainability-linked loan (SLL) with the drinking water company Dunea. We agreed on several sustainability performance indicators. If Dunea meets these targets, the company will receive a reduction in its interest rate. This encourages our clients to operate more sustainably and helps accelerate their sustainability ambitions. See the **Dunea impact case**, in which this SLL is discussed in more detail.



CLIENT CASE:
BRABANTSE DELTA
WATER AUTHORITY





Mary van Wijk

Strategic financial policy adviser



Margot Musters

Manager of legal affairs,
finance, procurement & real estate

The Netherlands in miniature

Innovation is key at Brabantse Delta

The Brabantse Delta Water Authority is a good reflection of the country as a whole. Despite all the challenges and problems involved, Mary van Wijk and Margot Musters are enthusiastic about it. They are equally enthusiastic about NWB Bank, a feeling that is mutual.

Our impact

Contribution of NWB Bank

As the water authorities house bank, we support Brabantse Delta with all financing-related matters. We also handle payment services, enabling the water authority to ensure a smooth tax collection process.

Key figures fo the Brabantse Delta Water Authority

- 170,744 hectares of service area
- 568 kilometres of flood defences
- 17 sluices and navigation locks
- 17 wastewater treatment plants
- 227 polder pumping stations
- 1,752 weirs and 82 sewage pumping stations
- 70 years as a client of NWB Bank

“NWB Bank works closely with us and has extensive knowledge of both the financial market and the water authority sector”

Brabantse Delta covers more than 170,000 hectares, stretching from Bergen op Zoom to Tilburg and from Baarle-Nassau to Geertruidenberg. It has a wide variety of land uses. "It's a bit like the Netherlands in miniature," says Margot Musters, manager of legal affairs, finance, procurement and real estate. "We deal with agriculture, nature, cities, flood defences – you name it. This requires us to work closely with our partners and be ambitious in terms of sustainability and innovation. We tackle the challenges together with residents, farmers and businesses. Our water authority is also an attractive employer, drawing many socially engaged young people. Joris Bengevoord, our chair, is the youngest in the Netherlands."

Focus on the future

"Innovation and sustainability are high priorities at Brabantse Delta, and we are strongly focused on the future. Farmers are also climate-conscious. They want to move forward and contribute as well. Nature plays a modest but important role in decision-making. Biodiversity and sustainability are in everyone's interest." Of course, there are sometimes conflicting interests, but according to Mary van Wijk these tend to lead to lively discussions rather than stalemates. She is a strategic financial policy adviser at Brabantse Delta. "We want to work together to make water management more robust. To this end, we are working with farmers on the *Zicht op Water* (View on Water) project. Among other things, we are installing digital water meters to measure groundwater and surface water withdrawals. These insights are needed to take further steps towards water conservation. The basis for this collaboration is trust."



Short lines of communication with the bank

In addition to making optimal use of water, it is also important to keep water out when necessary. Mary: "That's why we're going to reinforce five dike sections by 2050. These are enormous projects with an integrated vision, in which we have to take into account not only safety, but also issues such as housing, the energy transition, shipping and nature." Margot continues, "That's where the short lines of communication with NWB Bank come in handy. We contacted Sander to request an indication of interest rates for a linear or fixed loan. The bank works closely with us and has extensive knowledge of both the financial market and the water authority sector."

Payment services for a select group

Sander is Sander Bosman, team lead of the account desk in the Public Finance department at NWB Bank. "Mary and I speak regularly about the market and developments in it, as well as about geopolitics and the implications for the interest rate curve," he says. "And because the water authorities are shareholders in our bank, we go the extra mile to secure the lowest possible interest rate for them." Mary praises the client focus, noting that questions are answered quickly and clearly. "The annual client day for water authorities and the newsletter are also greatly appreciated. We are also very satisfied with the payment services." "It is an exclusive service", says Jacqueline Huisman of the payments department. "We provide payment services for a select group, mainly consisting of our shareholders."

Innovation in practice

This centres on digitalisation and innovation, areas in which Brabantse Delta is highly active. "We invest heavily in our people, including equipping them with 21st-century skills," says Margot. "Data-driven working and AI: what do they require from people? We aim to foster innovation across the organisation, which is why, as a water authority, we have worked to professionalise it. The R&D team is a good example of this.



One of our innovative projects involves turning wastewater into biodegradable plastic, as part of the PHA2USE initiative. This has already been successful on a small scale, and we are now ready to market the semi-finished product on a larger scale. We're also working on extracting iron phosphate from sludge using a magnetic technique. Phosphate can serve as a raw material in fertilisers, paints, batteries and more. In this way, waste becomes a valuable resource. We're collaborating with AquaMinerals, the Limburg Water Authority and STOWA on this project." The latter is the knowledge centre of the water authorities.

Innovation lab established

The Innovation Lab, which houses the R&D team among others, is a project that has weathered many storms and learned from its mistakes. "Literally," says Mary. "There will soon be a beautiful building, but the R&D team used to be housed in a tent that was blown over in a storm. The challenges in sustainable water management, combined with the increasing complexity of operational processes, require a structural approach to innovation. We're working on this together with many educational institutions and companies, because we cannot do it alone." Margot adds: "Society is becoming more sustainable, and that requires investment in innovation. In the Innovation Lab, colleagues are given the space to experiment, and not everything has to succeed. The real value lies in the few ideas that do." Hopefully, these will help solve the major challenges. 'With significant investment in sewage treatment plants and flood protection, for example. Our guiding principle is: natural where possible, technical where necessary. In other words, we aim to renew and innovate in ways that cause as little ecological damage as possible."



CLIENT CASE:
DUNEA DRINKING
WATER COMPANY





Wim Drossaert
Director Dunea



Celene Kraaij
Business controller
Dunea

First SLL for drinking water company

Nature-inclusive drinking water supply

Dunea's logo features the slogan 'Dunes & Water' and depicts a toad. This suggests a nature organisation or recreational area rather than a drinking water company. Yet that is exactly what Dunea is, even in the heart of the densely populated Randstad. The logo is therefore a perfect fit: it is a drinking water company with a strong focus on people, nature and the environment.

Part of the SLL

- the implementation of management and restoration measures in nature areas
- the use of bio-based piping materials
- providing guest lessons on nature and drinking water

Key figures Dunea

- Customers: 1.4 million
- Municipalities: 17
- Water supplied per year: 80 billion litres
- Dune area under management: 2,500 hectares
- Recreational users: 1 million
- Client of NWB Bank for 10 years

"Sustainability is an intrinsic motivation for us; the combination of nature and water is in our DNA."

"First of all, let me say how pleased we are that we managed to conclude a sustainability-linked loan with you before the end of the year," says Aard Kluck, Account Manager Specialised Finance at NWB Bank. "We are genuinely proud of that." It is the first SLL for a drinking water company, with several more expected to follow. NWB Bank has previously arranged SLLs for water authorities, housing associations and a healthcare organisation. Wim Drossaert, Director at Dunea, shares that enthusiasm. "Sustainability is an intrinsic motivation for us. Many of our employees are true nature lovers, and the combination of nature and water is in our DNA. Our core task is, of course, to supply drinking water, but we want to do so in the most nature-inclusive way possible. With this SLL, we hope to show other drinking water companies that a sustainable and nature-inclusive approach is not only desirable, but achievable." Aard adds, "And that is precisely the purpose of a sustainability-linked loan: to encourage sustainability."

"It is the most densely populated region in the Netherlands, right in the heart of the Randstad and below sea level"

Nature-inclusive solutions

Dunea operates in a particularly challenging area in the western part of South Holland. "It is the most densely populated region in the Netherlands, right in the heart of the Randstad and below sea level," Wim explains.



"Our groundwater is brackish, so we have to source fresh water from rivers further away. We transport it to our dunes, which primarily serve as natural storage. Because it is used for drinking water, the area has never been built on and has become a nature reserve, which we also manage because it is important for biodiversity and recreation. That is why we consistently opt for nature-based solutions." Approximately 90% of Dunea's customers are households, with the remaining 10% businesses.

High water as a reason to celebrate

In a region that continues to grow rapidly, ensuring a reliable drinking water supply calls for creativity. "Of the 900,000 homes that need to be built in the Netherlands, around 225,000 will be in South Holland," Wim says. "We already face a shortage of drinking water and have to purchase it from elsewhere, while shortages are also

"The water authorities are fighting high water levels. For us, high water is actually a reason to celebrate."

emerging in those areas. At present, we supply around 80 billion litres of water per year, but between 2030 and 2040 that will need to increase to 110 billion litres. To meet this demand, we are expanding our systems wherever possible, even as the limits of nature come into view. New technologies and new sources outside the dunes are helping, but this requires cooperation from the surrounding area, and that cannot always be taken for granted. Newspapers are full of stories about grid congestion, and we are facing a similar problem. Yet as long as water continues to flow from the tap, people do not recognise the urgency of the situation." While demand is rising, supply is coming under pressure. "Climate change is leading to drier summers. That means not only less water, but also poorer water quality, which increases purification costs." With a touch of irony, he adds: "The water authorities are fighting high water levels. For us, high water is actually a reason to celebrate."

Impactful employer

Flooding, however, is not the answer; buffering is. In the longer term, new solutions may emerge. "We are even in talks with Germany about storing water in former lignite mines," Wim says. "As you can see, we are looking well beyond our own area." That broader perspective is unavoidable, as rivers originate far beyond

Dunea's jurisdiction. "I can't go to Wallonia and tell them to discharge less waste into the rivers. But what really frustrates me is that the province of Limburg is considering granting a permit to a company to discharge 5 kg of PFAS per year. Removing those substances from river water is far more expensive than preventing them at the source. And the polluter should pay, not the drinking water customer. We often get involved in complex societal issues, which has one advantage. They make us an attractive employer. People want to work here because they can truly make an impact."

Nature conservation, circularity and societal impact

Celene Kraaij, Business Controller at Dunea, agrees. "I made a conscious decision to work here and contribute to these goals. Throughout the organisation, you can see a strong commitment to sustainability and biodiversity. We are also pleased with our collaboration with NWB Bank. Arranging the SLL went smoothly. Together with Hielke van der Aa, Sustainability Analyst at NWB Bank, we developed strong ideas, particularly when defining the KPIs." Under the sustainability-linked loan, the interest rate is reduced if Dunea meets its predefined sustainability targets, specifically in nature conservation, circularity and societal impact. "We are happy with NWB Bank as our bank", Wim concludes. "Without them, we would not be able to take these steps." Aard agrees: "And we are equally pleased with Dunea as a client. Supplying drinking water is one of our strategic pillars, precisely because of its vital role in society."

"Throughout the organisation, you can see a strong commitment to sustainability and biodiversity."

"We provide affordable and appropriate financing to enable public investments."



ESSENTIAL PLAYER IN THE FINANCING OF THE DUTCH PUBLIC SECTOR



TOTAL LOANS PROVIDED

€9.4 billion

ESG TOPICS

- Social housing



KEY PLAYER IN FINANCING THE DUTCH PUBLIC SECTOR

NWB Bank is there for the entire Dutch public sector. Since our establishment, the water authorities have also opened up our bank to other public and semi-public organisations, such as municipalities, healthcare institutions and housing associations, but also to local sports clubs with a financial guarantee from their municipality. Over the years, we have become an indispensable financier in the public domain. We contribute to a discerning, diverse and innovative playing field in which public funds are used efficiently and effectively. Over the past 10 years, we have provided loans totalling almost €88 billion, and with a current balance sheet total of almost €73 billion, we are the fifth-largest bank in the Netherlands.

In 2025, we succeeded, despite fierce price competition, to consolidate our significant market share in the (semi-) public sector, ensuring the availability and affordability of funding for all clients. Our loan portfolio grew to a record level of more than €59 billion (2024: €57 billion). By pooling our clients' financing needs and leveraging our robust creditworthiness, we can attract favourable long-term financing in the international money and capital markets. Even during periods of financial uncertainty, such as last year's trade war and geopolitical tensions, we have proven that we remain a reliable and accessible partner as a promotional bank.

Sustainability-linked loans

A relatively new, special form of appropriate financing is the sustainability-linked loan (SLL). With this type of loan, we agree with the client in advance on a set of sustainability performance indicators to be achieved, and the client receives a discount on the interest rate if they are met. In this way, we aim to positively stimulate and help accelerate clients' (further) sustainability efforts. Sustainability is an important factor in all new lending and in assessing existing clients, not just in SLLs. In 2025, we agreed on sustainability-linked loans (SLLs) with 14 clients. It is an important strategic instrument for us, even though the SLL portfolio is relatively small.

Housing associations

Housing associations remained by far our largest client group in 2025. This is not surprising, given their substantial and ongoing financing requirements within the public sector. In total, NWB Bank provided €8.2 billion in financing to associations in 2025 (2024: €6.8 billion), consisting of new loan applications and revisions of credit spreads on existing loans. By the end of 2025, our total lending to housing associations had reached approximately €36.6 billion (2024: €35 billion). The Social Housing Guarantee Fund (WSW) reached the milestone of €100 billion in guaranteed loans in 2025. This means we financed around 37% of housing associations' outstanding guaranteed debt, primarily through long-term loans that align well with the depreciation periods of social housing.

Housing associations expect their financing needs to increase further in the coming years. The National Performance Agreements 2025–2035 stipulate that, in the reassessment at the end of 2024, associations must have sufficient investment scope until 2035 to address the major challenges of sustainability and new construction. The sector continues to invest heavily in improving the existing housing stock, including insulating homes and

reducing heat demand, with the aim of phasing out all homes with E, F or G energy labels by 2028 at the latest. In addition, a national construction target has been set: from 2029 onwards, housing associations must construct 30,000 new social rental homes each year, with the ambition of achieving this target by 2027.

NWB Bank exclusively finances the portion of housing association debt covered by WSW guarantees, i.e. DAEB activities. This ensures that our financing directly contributes to social value. Housing associations provide affordable housing for households on low incomes, support individuals facing social, medical or psychological challenges, accommodate refugees and invest in safe, liveable communities. In response to new European regulations, Dutch legislation will also soon be amended to permit state aid for mid-range rents. If this financing is eligible for a WSW guarantee, NWB Bank will, of course, be happy to contribute to financing this socially relevant sector.

Another development in the sector is the increase in the maximum guarantee ceiling at the WSW. From 1 January 2026, associations will be able to borrow up to €4.4 billion in guaranteed funding for their social housing projects, compared to a maximum of €3.5 billion until the end of 2025. The methodology for calculating the guarantee ceiling is changing, with the amount now being indexed retroactively and annually. For larger associations in particular, this means greater scope for investment aligned with current tasks and cost levels.

A leading role in sustainability

Housing associations jointly manage over 2 million social rental homes, in which approximately 4 million people live. They therefore represent a substantial share of the Dutch housing stock and play an important societal role. Given their size, housing associations are expected to take a leading role in making the built environment more sustainable. Sustainability is therefore becoming an increasingly important factor in policy across the sector. Housing associations are working to improve the energy efficiency of their properties, reduce heat demand and accelerate the upgrading of homes with low energy labels. Becoming climate neutral by 2050 will require significant investment in insulation, energy-efficient installations and smart technologies. New social housing must comply with prevailing environmental standards and be as sustainable and circular as possible. In this way, housing associations are making a structural contribution to national climate targets and ensuring that the housing stock is fit for the future.

Sustainable impact of housing associations

We now have a near-complete picture of the climate impact of our lending to housing associations. By the end of 2024, this amounted to 352 kilotonnes of CO_2-equivalent (2023: 319 kilotonnes). This equates to an emissions intensity of 10.2 tonnes of CO_2-equivalent per €1 million (2023: 9.8 tonnes). Both the absolute climate impact in tonnes of CO_2e and the relative impact in tonnes of CO_2e per €1 million financed increased in 2024 compared to the previous year. This increase is caused by a rise in natural gas consumption in housing association properties. The housing association sector is still operating well in line with the climate impact reduction pathway set out in our ESG transition plan. Our analyses also show that many housing associations are clear about the longer-term goal, generally expressed as a 'climate-neutral housing portfolio in 2050'. However, there is often still a lack of clear delineation of how that goal will be achieved, how progress will be monitored, and what intermediate targets will be set. Nevertheless, we see many positive developments following one another in quick succession. This gives us confidence that the sector will eventually make strides in making its approach more concrete.

In the housing associations' plans for climate impact and the energy transition, the national performance agreements, revised in December 2024, continue to play a key role. While these agreements provide significant guidance, they also have limitations. For instance, there is little focus on climate impact related to material use and the transitions towards a circular economy. Moreover, in the current system, the sector's financial resources offer limited scope for large-scale progress.

Municipalities

In 2025, NWB Bank provided municipalities with €720 million in loans (2024: €578 million) and €16 million to joint municipal schemes (2024: €76 million). For municipalities, we often provide credit in the form of a Medium Term Note (MTN), while other long-term loans are provided in the form of a private loan. At the end of 2025, our total loan portfolio with municipalities amounted to €5.75 billion. Including joint municipal schemes, this came to €6.47 billion, compared with €5.76 billion and €6.49 billion respectively at the end of 2024.

Trends and developments

Municipalities are close to their residents and carry out a wide range of public tasks at the local level. Since decentralisation in 2015, they have been responsible for much of the care and support provided in the social domain. Structural and predictable funding is essential for carrying out these tasks. Municipalities still receive a significant share of their income from the central government, with the municipal fund as their most important source of revenue. Although municipalities have generally managed their finances reasonably well in recent years, the outlook has recently deteriorated. Many are facing growing deficits, partly due to rising youth care costs and uncertainty about future central government contributions. Between 2024 and 2025, the Association of Netherlands Municipalities (VNG) repeatedly warned about the financial pressure this would create. From 2026 onwards, the size of the municipal fund will decrease significantly as a result of a change in the central government's distribution system. In the 2025 Spring Memorandum, the government made an additional €3 billion available cumulatively until 2027 to soften the impact and help cover deficits in youth care, among other things. However, structural uncertainty remains. A new, more stable financing system for municipalities is not expected until 2027.

Sustainable impact of municipalities

We now have a complete picture of the climate impact of our lending to municipalities. At the end of 2024, this was 181 kilotonnes of CO_2-equivalent (2023: 185 kilotonnes). This equates to an emissions intensity of 31.4 tonnes of CO_2-equivalent per €1 million (2023: 31.3 tonnes). Among municipalities, the absolute climate impact in tonnes of CO_2e therefore decreased slightly, while the relative impact in tonnes of CO_2e per €1 million financed increased. We therefore conclude that the sector is not operating in line with the climate impact reduction pathway of our ESG transition plan, which means we will again need to pay closer attention to reducing municipalities' climate impact in 2026.

We have assessed a large proportion of the climate plans for the municipal client group. While municipalities generally have reasonable reduction targets, monitoring impact and defining follow-up steps could be improved. We will continue to remind municipalities that they must also be transparent about the impact of their own organisation and of the real estate they own or manage.

Healthcare

As an essential part of the public sector, healthcare institutions are also an important client group for us. In 2025, we provided €118 million in loans to such institutions secured by the Healthcare Sector Guarantee Fund (WfZ) (2024: €233 million). Similar to the Social Housing Guarantee Fund, the WfZ guarantee contributes to affordable and accessible healthcare. At the end of 2025, our total outstanding loan portfolio to healthcare institutions, including university medical centres, amounted to €1.9 billion, compared to nearly €2 billion at the end of 2024.

Trends and developments

Demand for healthcare will continue to increase in the coming years, mainly due to an ageing population and rising life expectancy. As a result, healthcare expenditure will continue to rise structurally. At the same time, the sector faces persistent staff shortages, making it increasingly difficult to recruit and retain sufficient numbers of qualified healthcare professionals. The financial position of healthcare institutions is also under pressure due to rising energy, material and service costs. These cost increases are reflected in premiums and tariffs, which health insurers and citizens can only absorb to a limited extent. This makes the investment climate in healthcare more challenging, as also noted

by the Healthcare Sector Guarantee Fund. Healthcare organisations are therefore encouraged to collaborate with partners across the healthcare chain to accelerate the transition to appropriate care, with a focus on digitalisation, innovation and collaboration. The goal remains to keep healthcare accessible and affordable.

The healthcare sector also has a significant environmental impact. The National Institute for Public Health and the Environment estimates that it accounts for around 7% of national greenhouse gas emissions and around 4% of total waste volume. To reduce this impact, healthcare institutions, the government, health insurers and banks signed the Green Deal Sustainable Healthcare 3.0 in 2022. This agreement sets out commitments to substantially reduce CO_2 emissions, waste and the environmental impact of medication. NWB Bank joined the agreement in 2024. The Green Deal contains ambitious targets, including reducing CO_2 emissions by at least 55% by 2030 and setting out a roadmap towards a climate-neutral healthcare sector by 2050. These commitments are intended to help make the healthcare sector future-proof, sustainable and resilient.

Sustainable impact of healthcare

We have a clear picture of the climate impact of 99% of our healthcare lending. By the end of 2024, this amounted to 43 kilotonnes of CO_2 equivalent (2023: 63 kilotonnes). This equates to an emissions intensity of 21.9 tonnes of CO_2 equivalent per €1 million (2023: 32.7 tonnes). The climate impact of our healthcare sector clients decreased significantly in 2024, in both absolute and relative terms. This is partly due to a methodological change in the calculation of climate impact, and partly to our clients reducing their energy consumption. The sector is operating in line with our intended path to reduce climate impact. We have now assessed the climate strategies of a significant number of our healthcare sector clients. Notably, the Green Deal Sustainable Healthcare 3.0 has had a positive effect on these plans, with healthcare institutions generally setting clear reduction targets. Monitoring and reporting on climate impacts annually could be improved and is important for achieving long-term goals.

Government-backed loans

Foundations, associations and other legal entities that use a financial guarantee from a municipality or other (local) government can also apply to us for financing. As well as larger organisations, these are often smaller customers with limited financing needs but a clear social function, such as sports clubs and libraries that want to make their buildings more sustainable or renovate them. In 2025, we provided a total of €42 million in government-guaranteed loans (2024: €365 million).

NHG RMBS

As a promotional bank, we indirectly finance private residential mortgages by investing in NHG RMBS bonds, helping to keep mortgages affordable. These are residential mortgage-backed securities backed by Dutch residential mortgages with a National Mortgage Guarantee.

In 2025, we invested a total of €495 million in these bonds (2024: €225 million). The underlying mortgage loans have longer maturities; however, as the mortgage market has shifted towards shorter terms due to the steeper yield curve, part of the investments now has shorter maturities. In 2025, mortgages for properties with an energy label of A or higher received a lower interest rate. By the end of the year, our portfolio had grown to €3,287 million (€2,864 million in 2024). In the coming years, we aim to continue contributing to the affordability and sustainability of owner-occupied homes for first-time buyers and lower-income households.
The climate impact of our investments in NHG RMBS bonds amounted to 54 kilotonnes of CO_2 equivalent, with an emissions intensity of 21.3 tonnes of CO_2 equivalent per €1 million.



CASE: HOUSING CRISIS



Affordable Housing Plan

- promoting the housing supply
- mobilising investments
- enabling immediate support and stimulating reforms
- protecting those most severely affected



Matthew Baldwin

EC Affordable Housing Task Force

Stimulating housing construction in the EU

WORKING TOGETHER TOWARDS SUSTAINABLE, HIGH-QUALITY AND AFFORDABLE HOUSING

It will not have escaped anyone's attention that the Netherlands is facing a severe shortage of affordable housing. The challenge is not unique to the country; it is felt across Europe. At the same time, substantial efforts are underway to address the problem. One important step is the European Affordable Housing Plan, which is set to take effect in 2026.

Housing market figures

- 2.4 million homes owned by housing associations
- 30,000 social housing units are set up to be built annually from 2029
- 1 in 3 social housing units financed by NWB Bank
- WSW exceeds the €100 billion guarantee volume threshold



Jo van Kalsbeek

Director WSW

"We have a close working relationship with the bank. It is a committed and extremely important partner"

Jo van Kalsbeek is a member of the board of directors of the Social Housing Guarantee Fund (WSW), where he is responsible for operations, finance, information management and risk management. The WSW guarantees loans from financiers to housing associations, helping secure favourable financing terms. Like NWB Bank, the organisation holds a triple-A credit rating. "Under current legislation, this primarily concerns homes with rents below the social rent threshold of just over 900 euros. By guaranteeing these loans, housing associations can access more affordable financing and operate more effectively. A positive development is that as part of the European Affordable Housing Plan the scope of state aid has broadened. This allows us to guarantee the construction of homes in the mid-rent segment, with rents of up to around 1,200 euros. Once this European legislation has been incorporated into Dutch law, the impact will be tangible. It will enable us to build an additional 5,000 homes with WSW guarantee per year in the Netherlands. That will improve mobility in the housing market."

"A positive development is that as part of the European Affordable Housing Plan the scope of state aid has broadened. This allows us to guarantee the construction of homes in the mid-rent segment, with rents of up to around 1,200 euros."

Flywheel effect for the housing market

Part of the housing crisis stems from limited movement between social housing and mid-range rental homes. Narrowing that gap can help unlock the market. "This can create a flywheel effect. We are now in a position to significantly expand the supply of mid-range rental housing over the coming decades. Housing associations are highly motivated and ambitious in meeting the National Performance Agreements between the Minister of Housing and Spatial Planning and the Aedes umbrella organisation. Their commitment extends beyond building tens of thousands of new homes to maintaining, improving and making existing homes more sustainable. The scale of the task is considerable. The Netherlands has around 2.2 million social housing units, all of which must remain affordable for people on low incomes." To realise these ambitious goals, however, more financial leeway is needed. "From 1 January 2026, the WSW increased the maximum guarantee cap from €3.5 billion to €4.4 billion, providing larger housing associations greater scope to invest."

Unacceptable number of homeless people

Jo also welcomes the fact that new European regulations allow for more generous state aid to address shortages in the mid-range rental segment. "There is now a European Commissioner for Housing, which underlines that the housing crisis has become a priority at the EU level." Dan Jørgensen is responsible for both housing and energy, while Matthew Baldwin heads the Housing Task Force



under his remit. "The shortage of affordable housing is becoming increasingly prominent on the political agenda, both in the Netherlands and across Europe," Matthew says. "People's needs are changing, but the housing stock has not kept pace. The lack of suitable, reasonably priced housing is not confined to large cities. Smaller municipalities are affected as well. The shortage is most acute precisely in areas where jobs are concentrated. As

a result, young people are forced to live with their parents for longer. In countries such as Italy and Croatia, this can continue well into their thirties. This also leads to a demographic crisis, as it becomes more difficult for young people to start a family. Clearly, the system is not functioning as it should. Most troubling of all is that there are around one million homeless people in the EU, including 400,000 children. That is simply unacceptable."

“"The shortage of affordable housing is becoming increasingly prominent on the political agenda, both in the Netherlands and across Europe”

Maximum flexibility

These challenges underscore the need for a course correction, a change Ursula von der Leyen, President of the European Commission, has been keen to drive forward. "That is why Dan Jørgensen was appointed European Commissioner for Housing, why the Housing Task Force was established and why the Affordable Housing Plan was presented in December 2025," Matthew explains. "The original intention was to deliver the plan in the first quarter of 2026, but President von der Leyen insisted it be brought forward to 2025. And rightly so, because speed is essential. The guiding principle is that housing remains primarily the responsibility of Member States, regions and cities, with the EU providing support where needed.

The plan is built around four pillars: promoting housing supply, mobilising investment, enabling immediate support and stimulating reforms, and protecting those most severely affected." All available methods must be used, including traditional techniques and newer approaches such as modular and off-site building, as well as innovative materials and construction methods, to deliver cost-effective, environmentally friendly, high-quality housing. Additional steps include repurposing existing buildings, digitalising processes and, above all, sharing knowledge and experience across borders. The cost of addressing the housing gap will require an annual investment of around €150 billion, according to the Commission. It also demands maximum flexibility and the avoidance of unnecessary regulation. This is why state aid rules are being revised to make it easier and faster for governments to support investment into social and affordable housing. Achieving this has been a key objective for NWB Bank, working closely with the WSW, Aedes, the Ministry of Housing and Spatial Planning, Housing Europe and the European Association of Public Banks. "In addition," Matthew explained, "the Commission is going to map where EU rules constrain the supply of affordable housing, stressing that they do not intend to undermine the underlying objectives. And Member States, cities and regions should also look at their own rules in this respect, including how they implement EU regulation."

Building climate-neutral cities

To better align efforts across the European Union, the Commission is now actively discussing with Member States the planned European Housing Alliance, set to be launched in 2026. "It will provide a platform where EU institutions, Member States, cities, regions and all stakeholders can exchange best practices and work towards greater synergy and cooperation," says Matthew. "It is clear that obtaining a building permit needs to become as straightforward as possible, whilst recognising that the 27 Member States do not all have the same housing market," he continues. "At the same time, environmental considerations must be fully taken into account. The aim is to deliver housing that is sustainable, high-quality and affordable. This requires joint action – for example – to build climate-neutral cities and to strengthen resilience to water and climate challenges." Significant efforts are also being made to address the financial dimension of the challenge. "We have proposed a long-term EU budget dedicated to this purpose, now being negotiated with the Member States and the EP. In addition, we are coming forward with the Pan European Investment Platform, including a coalition of financial institutions to encourage cooperation and the exchange of experience." National promotional banks, including NWB Bank in the Netherlands, play a key role in this process. They have indicated that collectively they plan to invest around €375 billion by 2029. "That is a substantial amount, and a very welcome indication

that the NPBI community is taking the housing issue extremely seriously."

Open and constructive relationship

Matthew points to the Dutch social housing system, with its housing associations and WSW guarantees, as a model for other countries to learn from. "Our system is certainly attracting interest across Europe," says Jo. "It is made possible by the sector banks, including NWB Bank, and we value that highly. NWB Bank has a strong market position, operates efficiently and finances the sector on competitive terms. We have a close working relationship with the bank. It is a committed and extremely important partner, and the openness and constructiveness of the relationship are a real strength." Jo refers to the case of Vestia, then the largest housing association in the Netherlands, which faced serious financial difficulties. "A solution was found that served the interests of the sector as a whole. Vestia continued as three separate associations, with the loans split accordingly. NWB Bank actively supported this from its societal role."



"Our system is certainly attracting interest across Europe. It is made possible by the sector banks, including NWB Bank, and we value that highly"

Pursuing the same goal

"The WSW guarantee scheme also makes collaboration attractive for us," says Leonieke Blaauwgeers. As head of Public Finance at NWB Bank, she is in regular contact with the fund. "Together, we are working to significantly accelerate the construction of sustainable, affordable housing. In practice, housing associations face a growing number of constraints. These include the need to reduce nitrogen emissions and address grid congestion. In some cases, homes are already completed but cannot yet be connected to the electricity grid." This reinforces Matthew's view that the EU should do everything it can to stimulate housing supply across the Union, while leaving the concrete implementation to individual Member States. After all, no two countries or regions are the same. "NWB Bank and the WSW work closely together at every level, both administratively and operationally," Leonieke concludes. "We are pursuing the same objective: securing the lowest possible financing costs to accelerate housing construction in the Netherlands."

CLIENT CASE:
MARTINI HOSPITAL





Nena Tans

Financial controller



Karen de Vries

Strategic advisor

From pioneers to integrated policy

Martini Hospital steps up its green ambitions

The Dutch healthcare sector accounts for around 7% of national CO_2 emissions. Through the Green Deal Sustainable Healthcare, healthcare organisations have committed to significantly reducing their environmental footprint. In the north of the Netherlands, Martini Hospital in Groningen is already achieving tangible results. "Using a special filter, we remove 99% of medicinal residues from wastewater at the pharmacy and radiology departments."

Key figures Martini Hospital (2024)

- €463 million in revenue, profit of €12.1 million
- 3,549 employees, including 2,753 in healthcare and 796 in advisory and support roles
- 526 beds, 24,177 clinical admissions
- €45 million in total outstanding loans
- Specific hospital waste reduced by 17.5% (2025 compared to 2024)

"Departments are constantly looking at how they can do things differently, more intelligently, and with less waste"

Martini Hospital is a key healthcare hub in the north of the Netherlands. As a large, top-tier clinical hospital, it is well placed to make a meaningful impact through its sustainability ambitions. Individual departments have been working on sustainability for many years, with visible results in areas such as energy consumption and waste reduction. "With more centralised management, we expect to accelerate progress even further in the coming years," says Karen de Vries. She has held a pivotal role as a strategic sustainability advisor since October 2025. Together with her finance colleague Nena Tans, Karen speaks enthusiastically about the hospital's direction, its approach and the results achieved so far.

CSRD 'light'

The current focus is on developing a clear and well-considered plan. "We are not required to produce a full CSRD report, but we are working on a 'light' version," Nena explains. Through the Corporate Sustainability Reporting Directive (CSRD), the EU aims to encourage organisations to increase transparency and invest more systematically in sustainability. Because establishing proper reporting structures is complex, Martini Hospital is working with seven other leading Dutch clinical hospitals under the guidance of the consultancy firm BDO. At the same time, Karen and Nena are working closely with colleagues across the organisation to define the hospital's CSRD themes. What ambitions do they have for the coming years in terms of environmental performance, societal impact and good governance? And who will be responsible for delivering on each of these themes?



Frans van der Werf of NWB Bank is impressed by the hospital's decisiveness. The bank actively engages with its clients on sustainability issues. "Waste separation, sustainable mobility, responsible procurement, energy savings – the hospital is taking positive steps in all these areas," he says. He points to a special toilet in the radiology department as a good example. Patients who receive a contrast agent containing radioactive substances for a CT or MRI scan are asked to use this toilet for their first urination after the scan. The toilet is equipped with a filter that captures harmful substances from the urine, preventing them from entering the environment through the sewer system. "A similar filter has been installed in our hospital pharmacy to remove medication residues," Karen adds. "With this special filter, we remove 99% of medicinal residues from the wastewater ourselves. In addition, departments such as the operating room and the emergency department are already participating in a pilot where leftover liquid medication is returned to our pharmacy, specifically to be flushed through this filter rather than disposed in a special container that must be incinerated at high temperatures. Moreover, developments are continuing. Together with Isala Hospital, we are exploring further promising applications for the filter, such as removing oncological drugs from urine, potentially allowing valuable components of the medication to be recovered."

> **"Waste separation, sustainable mobility, responsible procurement, energy savings – the hospital is taking positive steps in all these areas"**

Intrinsic motivation

What is the key to a successful approach? According to Karen, involving employees across the organisation makes all the difference. "We work with green teams

to encourage staff to come up with ideas for the departments. That leads to many meaningful measures rooted in genuine intrinsic motivation. For instance, the dialysis centre found a way to dispose of dialysis tubes with regular waste, so they no longer need to be handled as specific hospital waste. Previously, the tubes were incinerated at high temperatures in special containers, resulting in high CO_2 emissions. Another initiative comes from the Children's Ward, which now asks parents to bring their own formula bottles. Departments are constantly looking at how they can do things differently, more intelligently and with less waste."

"Departments are constantly looking at how they can do things differently, more intelligently and with less waste."

Nena agrees and also sees strong motivation among employees. Since 2024, the hospital has organised an annual sustainability competition. Each year, staff can submit ideas to make the hospital more sustainable. This results in dozens of proposals, which employees then vote on. The winning idea receives €10,000 to implement, making the vote anything but symbolic. Thanks to the competition, the Endoscopy Centre and the Medical Technology Department began developing protective covers for medical instruments. These reduce wear during sterilisation, extending the instruments' lifespan. That proved to be another significant step forward, and the impact did not stop there. Many other proposals from the competition have since been realised, giving sustainability efforts across the hospital a real boost. In 2025, the winning idea was to replace all liquid soap with solid soap. The use of natural raw materials, combined with the reduced size and weight of the bars, has enabled the hospital to further reduce its CO_2 emissions.

Cooperation in the region

Alongside internal engagement, regional and national cooperation is another important driver of progress in the sustainability mission, Karen explains. Hospitals in Drenthe, Friesland and Groningen work closely together on the topic. Their sustainability coordinators meet monthly to exchange ideas. There is also Care2Change, a broad regional partnership exploring how healthcare can reduce CO_2 emissions and move towards more circular healthcare products. Almost all hospitals in the north are involved, along with many other partners, including the University of Groningen, the Hanze University of Applied Sciences, municipalities and provincial authorities. Large-scale research is underway, and Karen and Nena are eagerly awaiting the recommendations.



CLIENT CASE: VIA15



Impact

Improving road accessibility and safety in the Arnhem–Nijmegen region by increasing traffic flow, capacity, reliability and robustness of the road network, while taking the surrounding environment into account.



Hans Oude Nijhuis
Project director
GelreGroen



Rutger Beekhof
Project finance manager
NWB Bank

Effective collaboration between government and market

ViA15 improves the road network with a green approach

On 1 January 2026, the GelreGroen construction consortium officially began work on the ViA15 project. Over the coming years, the consortium aims to significantly improve traffic flow in and around Arnhem. It is a major infrastructure project with considerable challenges, not least due to its proximity to a Natura 2000 nature reserve. "We're looking at much more than just the motorist."

Key figures ViA15

- On parts of the A15, A18 and A12, traffic intensity can increase by 20%-35%
- The project allows for 4% more vehicle–kilometres across the entire area.
- Despite traffic increasing significantly up to 2030, there will be no more traffic jams than there are now.

Hans Oude Nijhuis:

"The measures are designed to improve traffic flow and reduce rat running"

Anyone travelling from Rotterdam towards Arnhem on the A15 motorway currently has to exit the motorway at Bemmel, just south of Arnhem. "The motorway ends there," says Hans Oude Nijhuis. He is the Project Director at GelreGroen and keen to emphasise the project's importance. Extending the A15 to the A12 and widening both motorways will improve traffic flow in the Arnhem–Nijmegen region and reduce rat-running. And the impact goes beyond the region itself, Hans emphasises. "The project area forms an important corridor running parallel to the Betuwe Route. With ViA15, we are also strengthening the connection between Rotterdam and Germany."

"With ViA15, we are also strengthening the connection between Rotterdam and Germany."

Expanding the road network is a major undertaking in itself, but in this case, more is at stake. Because the project area is near a protected nature reserve, the design has to meet strict environmental requirements. Consideration for nature is embedded at every level of the project. "That was one of the decisive reasons the government awarded the project to us," Hans explains. "It is also why the consortium is called GelreGroen."



Using expertise

The initial phase of the project is being carried out in close collaboration with Rijkswaterstaat. The consortium is fully committed to making progress, and much of the preparatory work had already been completed some time ago. Construction was originally scheduled to start in 2020, but the nitrogen issue brought the plans to a halt. On 2 October 2024, the Council of State finally gave the green light, after which the consortium was able to resume work immediately. This included restarting discussions with NWB Bank about part of the financing. "These were very constructive conversations," Hans says. "NWB Bank immediately showed its continued commitment." "That goes without saying," says Rutger Beekhof of NWB Bank. "Changes are inherent in projects of this scale, and we are happy to work closely with the client to find appropriate solutions."

"Consideration for nature is embedded at every level of the project. That was one of the decisive reasons the government awarded the project to us,"

NWB Bank frequently finances large infrastructure projects in which government bodies and market parties work together. According to Rutger, such public-private partnerships deliver clear societal benefits. Under the ViA15 agreement, GelreGroen is responsible for the construction, financing and maintenance of the project for a period of 20 years. This places the risks with a party that has extensive experience in managing complex road projects. Experience shows that this form of collaboration increases the likelihood that projects are delivered on time. If the private partner exceeds the agreed budget, it bears the additional costs. Another advantage is that the government requires less initial capital than under a traditional tender process, allowing multiple large-scale projects to be launched simultaneously. The periodic payments for construction and maintenance will only commence after full completion.

Broad benefits

The ViA15 project will span several years, with the new infrastructure expected to be fully completed by the end of 2031. In total, 12 kilometres of new motorway will be constructed, while around 22 kilometres of the existing A12 and A15 will be widened.



According to Hans, more of the work will become visible throughout 2026. "We've already started with activities such as sheet pile tests," he explains. "Parts of the new road will be built at a greater depth to minimise disruption to the surrounding area. To install the sheet piles safely, we first need to thoroughly examine the composition of the subsoil."

His story clearly illustrates the scale of such a project. At the same time, Hans speaks enthusiastically about the design principles behind ViA15 – choices that benefit not only motorists, but also cyclists and the natural environment. "We're creating nesting sites for swallows and other birds, for example, and replanting trees and shrubs in various locations. We also actively involve local residents, so they know what to expect and can contribute their ideas."

A feat of daring

The groundwork laid in 2020 gives Hans confidence in a smooth start to construction. He praises both his team's expertise and the close, constructive collaboration with the client, Rijkswaterstaat. Together, they are working step by step towards key milestones, such as relocating cables and pipelines to make room for a tunnel box and constructing temporary access roads. It is a considerable puzzle, with GelreGroen and many partners carefully fitting all the pieces together. Close coordination is also maintained with ProRail and rail operators, given the presence of several railway lines in the project area.

One of the most striking engineering feats on the new section of the A15 will be the construction of a new bridge over the Pannerden Canal. The bridge will be approximately 2.5 kilometres long and will have a separate cycle and pedestrian route beneath the roadway. There is still some waiting to be done before the bridge is completed, but Hans is already looking ahead to the opening. As far as he is concerned, it will be marked by a festive bike ride with the entire team.

"We provide financing for a climate-resilient and sustainable Netherlands."



FINANCING PARTNER FOR ENHANCING SUSTAINABILITY IN THE NETHERLANDS

TOTAL LOANS PROVIDED

€1.1 billion

ESG TOPICS

- Climate mitigation
- Energy





FINANCING PARTNER FOR ENHANCING SUSTAINABILITY IN THE NETHERLANDS

The coming decades will require major investments to further advance sustainability. We see our organisation playing an important role, not only with loans to our long-standing clients – such as water authorities and housing associations – but also by providing favourable financing for sustainable energy projects, such as wind farms, solar parks, geothermal energy and district heating networks. This is how we can contribute to an affordable energy transition in the Netherlands and take concrete steps to help shape our commitment to the Climate Agreement. We also see growth in renewable energy storage, and with it a growing need for financing. We are exploring how we can play a role in this area. By formulating our audacious goal, we have placed even greater emphasis on financing sustainable energy projects: by 2035, our loan portfolio will be energy-positive, on the path to becoming climate-neutral by 2050.

Financing sustainable energy projects

We started financing sustainable and renewable energy projects several years ago. Projects and organisations that are eligible for a subsidy – 'Stimulating Sustainable Energy Production and Climate Transition (SDE++)' – can come to us for financing. The SDE++ is the successor to the SDE+. Whereas the latter focused on renewable energy production, the SDE++ has focused on CO_2e reduction since its introduction in 2020. In the time since, technologies such as aquathermal and geothermal energy have become eligible under the subsidy scheme. We can also provide financing if a project has public shareholders or if local authorities provide a guarantee for the loan. Government involvement is an important condition for us as a public sector bank.

Further expansion of loan portfolio

In 2025, we continued to expand our loan portfolio with sustainability projects. The bank provided €227 million in financing for renewable energy projects in 2025, a clear increase from €110 million in 2024. Although the total financing volume increased, the number of new projects requiring financing fell, as did the average project size. This development was partly due to challenging market conditions, such as grid congestion, more complex permitting processes, and an increasing number of hours with negative electricity prices for renewable energy producers. In 2026, we will explore the possibility of expanding our lending to finance renewable energy storage initiatives, as these are becoming increasingly eligible for SDE++ funding and/or are government-backed. Such initiatives can also optimise the business case for new and existing projects in our portfolio by reducing grid congestion and storing surplus energy, for example. In general, we expect the average size of projects to decrease slightly. In line with our desire to further diversify by societal impact, we plan to expand our portfolio to include projects across other sectors in 2026. With the partial entry into force of the Collective Heating Act in 2026, we expect financing for heating networks to increase. At the end of 2025, our total outstanding loan portfolio for renewable energy projects amounted to €1,178 million (€1,088 million in 2024).

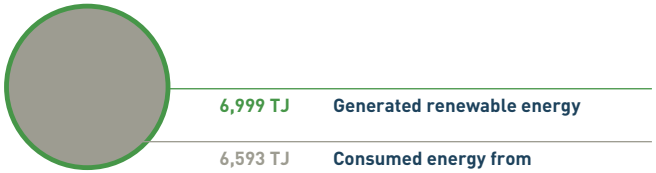
Our audacious goal: becoming energy positive by 2035

Financing the transition from fossil to renewable energy is a key focus of our organisation. In line with our goal for our loan portfolio to be climate-neutral by 2050, in 2022, we set an additional audacious target: our loan portfolio will be energy positive by 2035. By setting this target, we are focusing on a key component of our financing impact: optimising the energy balance of the organisations and projects we finance. On the one hand, we will encourage our clients to save energy, and on the other hand, we will stimulate renewable energy production through appropriate (project) financing. The definition of energy-positive is that, from 2035 onward, the production of renewable (climate-neutral) energy by our clients and projects we finance exceeds the consumption of fossil energy by our clients and projects. We are focusing on both the heat and electricity transitions. Since the introduction of this audacious goal, it has immediately brought greater focus to our approach to lending and engagement.

Progress against our audacious goal

Compared to the previous year, we have made significant progress towards our audacious goal. The data we use to monitor this goal, including our climate impact data, relate to the 2024 financial year. In 2024, our clients and projects produced a total of 6,999 terajoules (TJ) of renewable energy, which is an increase of over 30%. Their fossil energy consumption totalled 6,593 TJ, a decrease of almost 4%.

AUDACIOUS GOAL: ENERGY POSITIVE BY 2035



Since 2024, we have added four operational wind farms and one operational solar park to our portfolio. In addition, the water authorities have started generating and supplying more green gas, biogas and electricity. The heat producers we finance are also supplying more sustainable heat. Our loan portfolio is now energy positive, producing more renewable energy than fossil fuels consumed. However, there are still two major challenges to be addressed by 2035. On the one hand, we need to maintain our portfolio of energy projects by continuing to grant new loans, as our clients steadily repay their existing financing. On the other hand, it is important to seek out the market for sustainable heat. We have observed that the use of fossil fuels for heating is declining only marginally and that the opportunities for financing heat networks, among other things, were limited in 2025.

As with the calculation of our climate footprint, the energy production and consumption of the clients and projects we finance are attributed based on the ratio of our outstanding financing to the total liabilities of the client or project.

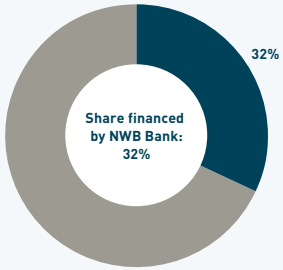
Consumption data comes from the knowledge institute Het PON & Telos, which includes this in its annual climate impact survey. We receive production figures from water authorities via engineering firm Arcadis, which collects this data as part of the annual water authorities' Climate Monitor. We collect client-specific data ourselves from renewable energy projects and heat networks, drawing in part on reports from technical advisors. As a result, we use a combination of client-specific data and sector averages. According to the PCAF methodology, this gives the audacious target a data quality score of 3 out of 5.

CLIENT CASE:
GEOTHERMIE DELFT



Our impact

Contribution of NWB Bank
Planned annual heat supply:
400,000 GJ
Share financed by the bank:
32%





Rass Butt
Director
Geothermie Delft



Peter Borghstijn
Project finance manager
NWB Bank

Geothermal energy from the university

From natural gas to geothermal energy in Delft

What began as a conversation in a Delft café has grown into an ambitious geothermal energy project. The heat source is located at the heart of the TU Delft campus, with heat consumers both on campus and across the Schie canal.

Key figures Geothermie Delft

- Consortium: Gaia Energy, Energie Beheer Nederland, TU Delft
- €76 million investment
- Geothermal energy tapped at a depth of 2.3 kilometres
- 80% emissions reduction
- 1,800 tonnes CO_2 e savings per year
- 15,000 homes heating equivalent
- Client of NWB Bank for 1 year

"We are learning a great deal from Geothermie Delft and will share those insights with governments and other stakeholders."

Geothermie Delft is a collaborative project involving TU Delft, Energie Beheer Nederland (EBN) and Gaia Energy. Gaia Energy has been working for over a decade on replacing gas-based heating with geothermal solutions. Rass Butt, Director at Gaia Energy and closely involved in the project, explains how it all started: "Back in 2007, a group of students were sitting in a café when they came up with the idea of supplying TU Delft with geothermal energy. That idea eventually took shape in 2018, when the consortium was formed. At the time, Shell was also involved, though it has since withdrawn. Geothermal energy, as a method of heat extraction, has existed for some time, but it is not feasible everywhere. In the Netherlands, however, the deep subsurface has been partially mapped thanks to decades of oil and gas exploration. That data showed that the TU Delft campus was a promising location."

Fifty to sixty years of heat

Even so, extensive geological research was required to determine the exact location. "Based on those studies, we started drilling. You never know exactly what you will encounter until you do. We lost one drill head during that phase, but the risks were well understood and acceptable given the scale of the investment. We now have two wells at a depth of 2.3 kilometres. The campus already has a heat network in place, and NetVerder is currently constructing a pipeline beneath the Schie canal and a busy road to connect the campus with the city. From early 2026, Geothermie Delft will supply heat to the university campus. Later that year, housing association flats will also be connected, ultimately serving the equivalent of 15,000 homes." Geothermal energy works by pumping hot water from deep underground, extracting the heat, and returning the water to its source. Well, almost – to the same stratum, about 1.5 kilometres away near the source. While it may sound like an endless cycle, it is not. "The heat source will be depleted in a few decades," says Rass, "but Geothermal Delft is expected to operate for at least 50 to 60 years."

Source of energy and knowledge

This is good news for the energy transition, as geothermal energy produces only negligible emissions compared to natural gas. "The CO_2 savings are enormous: around 1,800 tonnes per year, or approximately 275,000 tonnes over a 15-year period. That represents an emissions reduction of about 80%," says Rass. The students' original idea of heating the university remains intact, although only in part, as TU Delft is also exploring other forms of sustainable heat production. Over time, the project has gained an additional dimension. Geothermie Delft is positioning itself not only as a source of sustainable energy but also as a source of knowledge. "TU Delft is conducting a wide range of research related to the geothermal source," says Rass. "Geothermie Delft is not intended as a blueprint for similar projects, but we are learning a great deal from it and sharing those insights with governments and other stakeholders." The shared objective is to continuously improve and optimise geothermal energy extraction.

Financier of the energy transition

It is not the intention to leave the people of Delft out in the cold. TU Delft's local combined heat and power plant, therefore, serves as a backup should Geothermie Delft ever experience an interruption. In addition, a High Temperature Storage (HTS) facility is planned for the longer term. This will allow heat to be stored outside the heating season and provide extra capacity when needed. "Geothermie Delft is a highly attractive project for NWB Bank as a financier of the energy transition," says Peter Borghstijn, Project Finance Manager at NWB Bank. "Public-sector parties play a key role: the Dutch state through EBN, TU Delft and housing associations as end users. We are pleased to support this sustainability improvement in the built environment. Geothermal energy has already proven its value as a heat source, particularly in greenhouse horticulture, where heat demand is high. This technology can play an important role in the rollout of new heat networks. Geothermal Energy Delft also contributes to our broader ambition of achieving an energy-positive loan portfolio by 2035."

CORPORATE GOVERNANCE

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2



MANAGING BOARD (AS AT YEAR-END 2025) [ESRS]



Lidwin van Velden (1964)

Chair of the Managing Board, CEO

Year of first appointment
2010

Term of office ends on
Until April 2026

Portfolio
Strategy, communication, legal, corporate affairs, internal audit, human resource (HR) management & facilities, change & information management

Relevant other positions
President European Association of Public Banks, Member of the Board of Impact Economy Foundation, external Member of the Audit Committee of Stichting ABP, Member of the Supervisory Board of Achmea algemeen pensioenfonds (until June 2025), Member of the Supervisory Board PharmAccess Foundation (until December 2025)



Ard van Eijl (1973)

Member of the Managing Board, CRO

Year of first appointment
2022

Term of office ends on
Until April 2026

Portfolio
Risk management (financial and non-financial) and compliance

Relevant other positions
None



Frenk van der Vliet (1967)

Member of the Managing Board, CCO

Year of first appointment
2012

Term of office ends on
Until January 2026

Portfolio
Lending, funding & investor relations, asset & liability management and corporate social responsibility

Relevant other positions
None

Vacancy

Member of the Managing Board, CFO

Portfolio
Finance & Control, Operations, ICT
Until 1 August 2025, the position of CFO on the Managing Board was held by Wilma Schouten. As of that date, the position on the Managing Board is vacant.

SUPERVISORY BOARD (AS AT YEAR-END 2025) [ESRS]



Joanne Kellermann (1960)

Chair

Committees
Member of the Audit Committee, Member of the Remuneration and Appointment Committee

Year of first appointment
2020

Term of office ends in
Until April 2028

Principal position
Chair of Pension Fund Zorg en Welzijn

Relevant other positions
Member of the Supervisory Board Fokker Services Groep, Chair of Advisory Board Panta Holdings, Chair of the Supervisory Board at Aflatoun International, Member of the Council of State expert group, Member of the Willem F.Duisenberg Fellowship Stichting



André ten Damme (1964)

Committees
Chair of the Audit Committee, Member of the Risk Committee

Year of first appointment
2023

Term of office ends on
Until April 2028

Principal position
Board member of Pension Fund Zorg en Welzijn

Relevant other positions
Chair of the Supervisory Board at Diabetesfonds, Member of the Supervisory Board and Chair of the Audit Committee at CVO Groep (until 1 July 2025), Member of the Advisory Board of The Cronos Group



Geert Embrechts (1970)

Committees
Member of the Audit Committee, Member of the Risk Committee

Year of first appointment
2024

Term of office ends on
Until April 2029

Principal position
CFO Rabobank Wholesale & Rural (until 1-2-2026)
CFO ASA International (from 1-2-2026)

Relevant other positions
Member of the Supervisory Board at Rabo Herverzekeringsmaatschappij, Member of the International Advisory Board of the School of Business and Economics at Maastricht University



Toon van der Klugt (1956)

Vice-Chair

Committees
Member of the Remuneration and Appointment Committee

Year of first appointment
2017

Term of office ends in
Until April 2026

Last position held
Chair of the Water Authority of Schieland and Krimpenerwaard (until 31-12-2024)

Relevant other positions
Vice-Chair and Secretary of Stichting Administratiekantoor Vreugdenhil-Klugt Beheer, Board Member Stichting Blauwe Lijn



Caroline Oosterloo (1965)

Committees
Chair of the Risk Committee, Member of the Audit Committee

Year of first appointment
2023

Term of office ends on
Until April 2027

Principal position
Head of Regulatory Risk & Transformation ABN AMRO Bank (new role from 1-1-2025)

Relevant other positions
Board Member of Stichting Universiteitsfonds Utrecht (from 1 January 2026)



Maarten Otto (1983)

Committees
Member of the Risk Committee

Year of first appointment
2025

Term of office ends on
Until April 2029

Principal position
CEO Alliander

Relevant other positions
Chair of the Members' Council of Netbeheer Nederland, Member of the Executive Committee VNO-NCW, Chair of the employers' association WENB, Member of the Eurelectric Board of Directors



Annette Ottolini (1958)

Committees
Chair of the Remuneration and Appointment Committee

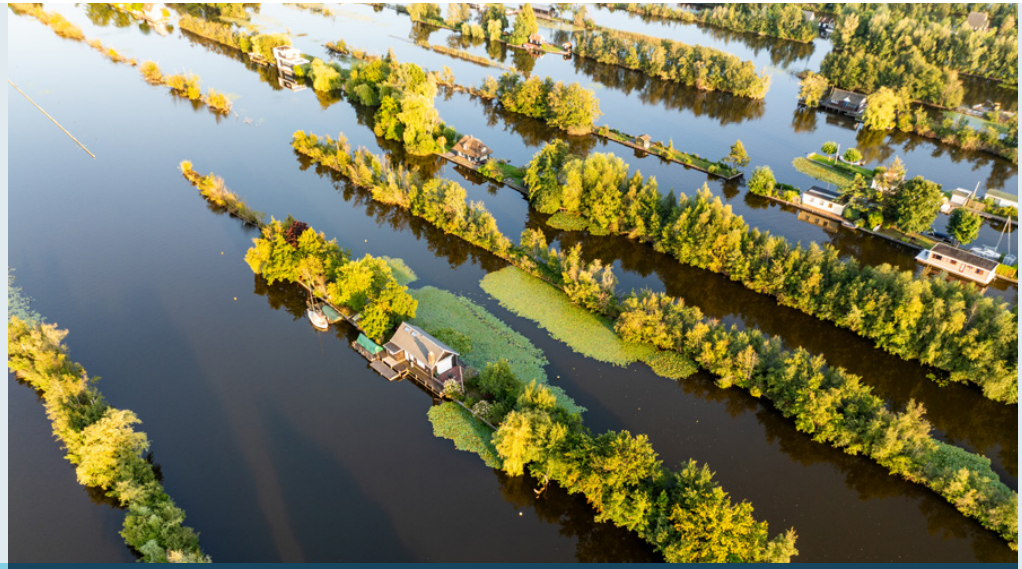
Year of first appointment
2019

Term of office ends on
Until April 2027

Last position held
General Director and Board Member at Evides Waterbedrijf (tot 4-7-2025)

Relevant other positions
Chair of the Supervisory Board at Vebego Group, Chair of the Board Familiehuis Daniel den Hoed (from 1-10-2025), Member of the Supervisory Board Delfluent (until 1-7-2025), Board Member vereniging Deltalinqs (until 1-7-2025), Board Member VEI (until 1-7-2025), Board Member Stichting Water for Life (until 1-7-2025)

Interview





Joanne Kellermann
Chair Supervisory Board

"The societal challenges are significant; there is much to be done"

"The Supervisory Board (SB) of NWB Bank looks back on a year marked by significant change. Developments included changes within the Managing Board (MB) and the SB itself, as well as further strengthening internal controls, all of which required considerable attention. Now that the organisation is once again fully staffed, it is time to look ahead. According to Chair of the SB, Joanne Kellermann, this is essential."

How do you look back on the past year?

"It was an intense year for NWB Bank and the SB. The SB was closely involved in strengthening internal controls and improving IT processes. In addition, there were two changes in the MB and the succession of a SB member. We are pleased that, in all cases, suitable successors were found. In August, we said goodbye to CFO Wilma Schouten, who, in consultation with the SB, decided not to complete her term after one year, choosing instead to take a new step in her career. At the time of this interview, we are looking forward to the upcoming appointment of her successor: someone with extensive knowledge and expertise who will complement the other members of the MB.

In 2025, Frenk (van der Vliet, *ed.*) also ended his term after 14 years. As CCO, he made an invaluable contribution to the bank's development, and we are deeply grateful for the tremendous amount of work he carried out for the organisation. The departure of someone with such extensive experience is significant, and we will also miss his warm personality. At the same time, we are pleased to welcome Elvira Eurlings, who succeeded him on 19 January 2026. With her solid treasury background and passion for sustainability, she will be a valuable addition to the team."

The SB welcomed a new member as well.

"That is correct. In the spring, we said goodbye to Frida (van den Maagdenberg, *ed.*), who had also reached the end of her maximum term of office. We will really miss her valuable contributions and sharp insights, as well as the pleasant collaboration we shared. As a hospital administrator, she brought considerable experience, particularly in the area of risk management. Maarten (Otto, *ed.*) succeeded her and has been working with us with great drive and enthusiasm since April 2025. We benefit greatly from his knowledge of the energy sector, where he is actively involved on a daily basis as CEO of Alliander. In June, we visited HVC, one of the bank's clients and a company active in waste processing and energy production. We were given an impressive tour and a detailed explanation of how the company supports water authorities and municipalities in becoming more sustainable through waste management and green energy solutions. Seeing the site first-hand made the visit particularly valuable. Watching waste processing in practice is humbling. Although the Netherlands now recycles more waste than ever before, we learned that there is still significant potential for improvement: up to 70% of residual waste could be reused. It is encouraging to see how a company like HVC is actively working to realise this potential."

"An intense and fruitful year"

As every year, the Supervisory Board carried out a working visit in 2025. Where did you go this time??

"At the end of the summer, we visited Hoogheemraadschap De Stichtse Rijnlanden in Houten. The wintry weather that surprised us in the Netherlands in January brought that visit back to mind, as it was there that we learned more about the strong collaboration between the water authority and the KNMI. In the context of climate change, the two organisations exchange data to better prepare the region for the increasingly extreme weather conditions that are becoming more frequent in the Netherlands. The water authority is responsible for water management in the southern part of the province of Utrecht and a small part of South Holland. In this area, it measures rainfall and shares the data with the meteorological institute. Using AI, among other tools, the KNMI analyses the information and feeds its insights back to the water authority. Maarten van Aalst, Director of the KNMI, provided us with valuable insights into this important work."

What a treat to get such an inside look at our clients. Turning to NWB Bank itself: the organisation has welcomed many new employees in recent years but is now holding steady. Is this wise?

"Yes, certainly. It creates room for new employees to find their place within the organisation and for others to further develop in their roles. The management development programme, for example, is already delivering tangible results."

While the organisation is entering calmer internal waters, the external environment remains turbulent. As chair of the Pensioenfonds Zorg en Welzijn pension fund, you are also confronted with this: geopolitical tensions are affecting financial markets. What do you think this means for NWB Bank?

"I thought 2025 was a turbulent year, but it remains turbulent; the start of this new year doesn't bode well. In such circumstances, it is crucial to be well prepared and able to adapt quickly. At the same time, cooperation within Europe is more important than ever, and NWB Bank actively seeks out such partnerships. A good example is the financing of smaller Dutch water projects through our strong partnership with the European Investment Bank. The European Association of Public Banks, chaired by Lidwin (van Velden, *red.*), is another key platform. Regular consultations with fellow members help us stay closely connected with our European partners."

In closing, what is your main wish for NWB Bank in 2026?

"Calmer waters, so that we can focus fully on the bank's valuable mission. The societal challenges are significant, and there is still much work to be done. The SB looks forward to working closely with the MB and employees to achieve this together."

"Cooperation in Europe is more important than ever"



REPORT OF THE SUPERVISORY BOARD [ESRS]

As the Supervisory Board, we are the supervisor, advisor and employer of NWB Bank's Managing Board. We operate in accordance with the letter and spirit of Dutch and European laws, regulations, directives and codes.

SUPERVISION

In 2025, our supervisory activities were guided by the Supervisory Vision 2025-2029. We operate independently, monitoring policy with a proactive and constructive yet critical eye. Our approach is grounded in trust and informed by our own knowledge and experience, with a clear focus on creating long-term value. Our annual supervisory agenda guides our activities, ensuring a good balance between our supervisory and advisory tasks and our role as employer.

In 2025, the Supervisory Board held seven regular meetings with the Managing Board. We also held regular consultations with the shareholders, the Joint Supervisory Team of DNB and the ECB, and the Works Council. At the end of the summer, we paid our annual working visit to a water authority. This year, we visited De Stichtse Rijnlanden Water Authority, where chair of the Water Authority Jeroen Haan, along with management, gave us a closer look at the authority's area of responsibility in the southern part of the province of Utrecht and a small portion of South Holland.

Consultation with the Managing Board

The Supervisory Board met seven times for regular consultations with the Managing Board, including a strategy day.

Topics

During these meetings, we discussed a broad range of topics, including the further strengthening of internal controls, succession planning, and new appointments to both the Supervisory Board and the Managing Board.

Composition of the Supervisory Board and the Managing Board

At the Annual General Meeting of 17 April 2025, Supervisory Board member Frida van den Maagdenberg stepped down after reaching the maximum term of office. She was succeeded at the same meeting by Maarten Otto. In the second half of the year, we began recruiting a new Supervisory Board member to replace Toon van der Klugt, who will reach his maximum term of office in 2026.

In the summer of 2025, Wilma Schouten stepped down as a member of the Managing Board and CFO of NWB Bank. Immediately thereafter, the Supervisory Board initiated the search for a successor. In the interim period, the portfolio has been divided: the CCO is acting for Operations, and the CEO for Finance & Control. An interim IT director has also been appointed, with responsibility for managing the IT organisation and leading specific projects to further strengthen IT governance and processes. We expect to nominate a new CFO for appointment shortly, subject to approval by DNB and the ECB.

Strengthening internal controls

Last year, internal controls at the bank were further strengthened through process improvements, specific tooling, and workforce expansion. The Supervisory Board closely monitored these developments, particularly in light of areas for improvement identified through internal audits and supervisory authority audits. The results of first-line monitoring and second-line testing of key controls were reported in full to the Risk Committee.

Strategic workforce planning

The Supervisory Board notes that the organisation has focused on the organisation's growth in recent years. We spoke with the Managing Board about the importance of strategic workforce planning and maintaining strong

risk awareness when recruiting new employees. In 2025, workforce expansion was paused, except where required by new regulations or market developments. NWB Bank also introduced a job classification system last year based on the Hay method, which is widely used in the financial sector for job evaluation. In addition, initial steps were taken to develop a succession planning policy to ensure effective succession in key positions and further strengthen the organisation's continuity.

ECB supervision

ECB supervision is a permanent item on the Supervisory Board's agenda. In 2025, we paid particular attention to stress tests, on-site inspections, and supervisory deep dives, as well as to the follow-up on resulting recommendations. Once again, we found that the ECB's supervision is highly intensive for significant banks and requires substantial organisational capacity.

Other topics

During the meetings, we also discussed the following topics:

- geopolitical developments and their impact on financial markets;
- developments in relevant sectors;
- policy developments in The Hague and Brussels;
- financial results;
- developments in risk management, including risk appetite;
- ICT management, digitisation and the Digital Operational Resilience Act;
- sustainability, including the further integration of ESG principles into the organisation and the transition to CSRD-compliant reporting.

Approach

Before each regular meeting, we hold a closed session without the Managing Board present. We use the time to exchange views on external developments and share individual observations, and discuss personnel matters. We also set objectives for the meeting. We share the outcomes of the closed part of the session, at the beginning of the meeting with the Managing Board.

In addition to the regular meetings, the chair of the Supervisory Board holds a fortnightly consultation with the chair of the Managing Board, and the chairs of the Supervisory Board committees regularly meet with the Managing Board member responsible for their respective areas. The Supervisory Board also holds informal meetings at least once a month.

Strategy day

Each year, the Managing Board and Supervisory Board hold a joint strategy day. During the strategy day in mid-2025, we discussed the strategy of the sustainable water bank in depth, reflecting on social developments in the Netherlands and geopolitical developments worldwide. We considered the financing needs of our client groups over the next five years, as well as the development of the bank's profit and capital position. The sustainability agenda and developments within the internal organisation were also key topics.

Supervisory Board member Maarten Otto gave a presentation on developments and challenges in the energy sector, drawing on his experience as Managing Director of Alliander. He highlighted the fundamental role of energy in society and the importance of the transition to green energy.

Based on the discussions during the strategy day, the Supervisory Board concluded that the sustainable water bank's strategy remains sound and that the bank is well-positioned to achieve its strategic objectives. We also reaffirm our support for the bank's societal role in addressing urgent challenges such as climate adaptation, climate mitigation and nature conservation, alongside the growing investment needs of the public water sector and housing associations.

Dialogue with stakeholders

In addition to meetings with the Managing Board, we held regular consultations with our shareholders, the ECB and DNB Joint Supervisory Team and the Works Council.

Dialogue with shareholders

Outside the formal shareholders' meetings, we met with shareholders on several occasions in 2025. These

MEMBERS' ATTENDANCE OF SUPERVISORY BOARD MEETINGS AND RELEVANT COMMITTEES IN 2025

	Joanne Kellermann[1]	André ten Damme	Geert Embrechts	Toon van der Klugt	Frida van den Maagdenberg[2]	Annette Ottolini	Caroline Oosterloo	Maarten Otto[3]
Supervisory Board (7)	100%	100%	100%	100%	100%	86%	100%	75%
Audit Committee (6)	83%	100%	100%		100%		100%	40%
Risk Committee (6)	100%	100%	83%		100%		100%	33%
Remuneration- and Appointment Committee (4)	75%			100%		100%		
Totaal	90%	100%	94%	100%	100%	93%	100%	49%

1) Standing invitation for Risk Committee meeting
2) Standing invitation for Audit Committee meeting, commissioner till 17 April 2025
3) Standing invitation for Audit Committee meeting, commissioner as of 17 April 2025

included two meetings with the Department for State-Owned Enterprises of the Ministry of Finance and one with representatives of the shareholder water authorities. Discussions focused primarily on two topics: 1. the recruitment and selection of two Managing Board members and a new Supervisory Board member, and 2. the preparations for the evaluation of the remuneration policy or the Managing Board by the shareholder committee. We are satisfied with these consultations and find them to be constructive.

Dialogue with the European supervisory body

In March 2025, we held an introductory meeting with the largely renewed ECB and DNB Joint Supervisory Team (JST). Later in the year, in October, both the Supervisory Board and the Managing Board met with senior ECB management in Frankfurt. These discussions covered key developments at NWB Bank, governance matters and supervisory priorities from both the perspective of the Supervisory Board and that of the JST.

Dialogue with the Works Council

As in previous years, an SB delegation attended two consultation meetings with the Works Council. Key topics included the transition to a new pension scheme under the new Pensions Act, the introduction of the job classification framework, housing, workforce growth, absenteeism and staff turnover. The Supervisory Board values the commitment, professionalism and enthusiasm with which the Works Council represents the interests of the organisation and its employees.

Committees

The Supervisory Board has three committees: the Audit Committee, the Risk Committee, and the Remuneration and Appointment Committee. Supervisory Board members who are not members of a committee have a standing invitation to attend committee meetings. In accordance with their respective charters, the committees prepare decision-making and advise the Supervisory Board.

Audit Committee

The Audit Committee discusses financial and operational developments based on the quarterly reports of the Managing Board, the internal auditor's quarterly, and the external auditor's half-yearly reports. In 2025, particular attention was paid to:

- the implementation of the Corporate Sustainability Reporting Directive (CSRD), which was introduced one year earlier than initially required and applied to the 2024 financial year;
- ICT, including cybersecurity and processes;

- operations;
- cost management;
- the bank's capital ratios;
- the strengthening of internal governance and controls;
- the transition from EY to PwC as external auditor as of the 2026 financial year.

The Audit Committee consists of André ten Damme (chair), Geert Embrechts, Joanne Kellermann and Caroline Oosterloo. Maarten Otto (and until mid-April Frida van Maagdenberg) made standard use of the standing invitation of the Audit Committee. The committee met four times in regular session, attended by the Managing Board, the external auditor, the head of Internal Audit and the head of Finance & Control. In addition, two dedicated calls on specific topics were held. The chair of the committee maintained regular contact with the external auditor, the head of Internal Audit and the bank's CFO.

Risk Committee

The Risk Committee focuses on the risk management framework and the extent to which the organisation operates within that framework. In 2025, significant attention was given to the annual update of the Risk Appetite Statement. Given the strengthening of internal controls, the committee devoted considerable attention to operational risk management and related reporting. ESG risks were also discussed based on a materiality analysis and ESG-specific stress tests developed by the organisation. There was also discussion of ways to further integrate ESG into risk management. Supervisory authority thematic inspections and follow-up on related findings remained standing agenda items.

At the beginning of 2025, the Risk Committee consisted of Caroline Oosterloo (chair), André ten Damme, Geert Embrechts and Frida van den Maagdenberg. Following Frida van den Maagdenberg's resignation at the Annual General Meeting (AGM) on 17 April 2025, Maarten Otto succeeded her on the committee. Joanne Kellerman made standard use of the standing invitation of the Risk Committee. During the year, the committee held five regular meetings attended by the Managing Board, the heads of Internal Audit and Compliance, and the external auditor. In addition, a thematic call was held. The committee chair maintained regular consultations with the CRO and the Head of Compliance. As is customary, a member of the Audit Committee accepted the standing invitation during the year.

Remuneration and Appointment Committee

The Remuneration and Appointments Committee prepares decision-making on remuneration and appointments. During its meetings in 2025, the committee addressed the following topics:

- the evaluation of the employee remuneration policy, aligned with the five-year evaluation of the Managing Board remuneration policy coordinated by a shareholder delegation;
- HR risk reporting;
- the transition to the new pension system;
- the evaluation of the management development programme and succession planning;
- the recruitment, selection and reappointment of Managing Board members and a Supervisory Board member.

For each vacancy on the Managing Board or Supervisory Board, the committee establishes a dedicated selection committee composed of Supervisory Board members. Elvira Eurlings was appointed CCLO at an Extraordinary General Meeting on 8 January 2026. She is succeeding Frenk van der Vliet, whose term ended. Following the early departure of Managing Board member Wilma Schouten, recruitment for a new CFO also commenced at the end of the summer. A successor has been identified and will be proposed for appointment in the AGM on 16 April 2026. The committee also proposed the reappointment of CEO Lidwin van Velden and CRO Ard van Eijl. Both terms of these members of the Managing Board expire in 2026. Their reappointments will also be submitted for approval at the General Meeting.

In addition, attention was given in 2025 to the recruitment of a new Supervisory Board member to succeed Toon van der Klugt, who reached the end of his term. For this specific position, the shareholder water authorities have

a right of recommendation. The proposed successor will be submitted for appointment at the General Meeting on 16 April 2026, subject to approval by the DNB and ECB.

The Remuneration and Appointments Committee consists of Annette Ottolini (chair), Joanne Kellermann and Toon van der Klugt. The committee met three times in regular session during the year, attended by the CEO and the head of HR & Facility. The committee also held a dedicated call on a specific topic.

Recruitment selection committee

For each recruitment of a Supervisory Board or Managing Board member, the Supervisory Board establishes a separate selection committee composed of members with specific expertise relevant to the candidate profile.

Evaluation of remuneration and compensation policy

Every five years, the remuneration policy for the Managing Board and the remuneration of the Supervisory Board are evaluated. This evaluation is prepared by a shareholder committee. In addition to a delegation of shareholders, the chair and vice-chair of the Supervisory Board participate in this committee as observers. The evaluation is further explained in the Remuneration Report.

COMPOSITION OF THE SUPERVISORY BOARD

The composition and personal details of NWB Bank's Supervisory Board are shown at the beginning of this chapter (see personal details). The composition of the Supervisory Board takes into account the complementarity of the team in terms of knowledge and experience. The Supervisory Board consists of seven members, three of whom are women and four men, thus meeting the desired and required gender diversity. Further information on the diversity and independence of the Supervisory Board can be found in the **Corporate governance section**.

QUALITY ASSURANCE OF SUPERVISION

To ensure the quality of supervision, we carry out an annual self-assessment and engage in lifelong learning.

Self-assessment

Each year, the Supervisory Board uses an online self-assessment tool to reflect on its strengths and areas for improvement, focusing on both its internal functioning and its relationship with key stakeholders, including the Managing Board. As part of the three-year evaluation cycle, the Supervisory Board engaged an external, independent agency in 2024. The regular online self-assessment was conducted at the end of 2025. The results were first discussed during the closed session of the Supervisory Board meeting in March, after which the main points were shared with the Managing Board.

DISTRIBUTION OF AREAS OF EXPERTISE ON SUPERVISORY BOARD

AREAS OF EXPERTISE	Joanne Kellermann	André ten Damme	Geert Embrechts	Toon van der Klugt	Frida van den Maagdenberg	Caroline Oosterloo	Annette Ottolini	Maarten Otto
Banking/ financial markets	X	X	X			X		
Finance/accountancy/ risk management		X	X		X	X		X
Regulation	X		X			X		
IT/cybersecurity		X		X	X		X	
HR/remuneration policy				X	X		X	X
Corporate governance	X		X			X		
Socio-political environment	X						X	X
Water authorities/ semi-public sector				X	X		X	X
Environmental, Social an Governance	X		X	X		X	X	
Operations/outsourcing		X		X	X			X
Communication	X						X	X

Overall, the Supervisory Board is satisfied with its functioning and that of its committees. The Supervisory Board has a diverse composition in terms of background and expertise. It pays close attention to the bank's social and sustainable nature, as well as to stability and continuity. In addition to reflecting on our performance over the past year, the Supervisory Board looked ahead to the near future. One of the conclusions, consistent with earlier assessments, was the need for more frequent interim contact, including informal contact, with the Managing Board. As a result, interim calls are now held between (committee) chairs and Managing Board members, and Supervisory Board members also hold a monthly informal call among themselves. These moments provide additional opportunities to exchange views on topics outside the formal agenda.

At the end of 2025, the Supervisory Board adopted its supervisory agenda for 2026, outlining the topics to be addressed during the year. The Supervisory Vision 2025-2029 is available on NWB Bank's website.

Lifelong learning

The bank invests in lifelong learning to continuously strengthen the expertise and environmental awareness of the Supervisory Board. In 2025, internal and external experts gave presentations to members of the Supervisory Board and the Managing Board on the following topics:

- the Dutch political environment for banks;
- sector analysis of housing associations (Risk Committee);
- sector analysis of healthcare institutions (Risk Committee);
- geopolitical developments;
- developments in the energy transition;
- an in-depth review of HR developments and the 2025 employee satisfaction survey;
- sector analysis of grid operators;
- Business Continuity Management and Recovery Plan.

In 2025, the Supervisory Board and the Managing Board made two joint working visits; we visited a water authority and a company active in waste processing and energy production. Supervisory Board members also attended educational sessions on an individual basis, including in the areas of:

- climate risks and energy
- biodiversity
- nature-inclusive financing
- AI
- geopolitics and uncertainty

WORD OF THANKS

We look back on a year marked by changes in both the Managing Board and the Supervisory Board. At the beginning of 2026, we said goodbye to Frenk van der Vliet after 14 years of service and welcomed Elvira Eurlings as his successor. We can also confirm that, in early 2026, the Managing Board will soon be complete again and that a successor has been identified for departing Supervisory Board member Toon van der Klugt. Cooperation throughout the year was intensive and effective, and the bank achieved strong results both internally and externally. In dialogue with the Supervisory Board, the organisation took further steps to strengthen internal control. Looking ahead, it remains important to continue highlighting the added value of NWB Bank's business model and strategy, both in The Hague and in Brussels.

Finally, the Supervisory Board would like to thank the Managing Board and all employees for their commitment, which once again resulted in a positive impact by the sustainable water bank in 2025.

The Hague, 23 March 2026

Supervisory Board
Joanne Kellermann, chair
André ten Damme
Geert Embrechts
Toon van der Klugt
Caroline Oosterloo
Maarten Otto
Annette Ottolini

REMUNERATION REPORT [ESRS]

Our remuneration policy is clear and transparent, designed to attract and retain qualified, knowledgeable staff. It also reflects our societal role as a bank of and for the Dutch public sector. We opt for a moderate and sustainable remuneration policy that is consistent with our bank's strategy, low risk profile and risk appetite. As a result, it contributes to the achievement of our objectives, which focus on sustainable long-term value creation.

MANAGING BOARD REMUNERATION POLICY

The Annual General Meeting of Shareholders determines the remuneration policy for the Managing Board, based on a recommendation from the Supervisory Board. With this remuneration policy, the shareholder provides the framework for the Supervisory Board to award appropriate and responsible remuneration to the Managing Board. Since 2010, the remuneration policy has been reviewed every five years. In accordance with the articles of association and the charter of the Supervisory Board, the remuneration policy was reviewed and adopted at an Extraordinary General Meeting (EGM) on 8 May 2025.

The evaluation was conducted by a shareholders' committee composed of representatives of the Dutch State and the water authorities, in line with good practice. The chair of the Supervisory Board and a representative of the Remuneration and Appointments Committee participated as observers, while the secretary to the Supervisory Board acted as secretary to the shareholders' committee. The committee reviewed the principles and considerations underlying previous evaluations and provided the General Meeting with summary advice to support the formation of a majority position. The evaluation also took into account the views of the members of the Managing Board on the level and structure of their own remuneration. Two options were considered: maintaining the remuneration policy adopted in 2020, or recalibrating it using the weighting formula that has underpinned the policy since 2015. The EGM on 8 May 2025 approved the recalibration of the remuneration policy, based on the bank's current public (60%) and private (40%) character. Of the votes cast, 81.42% were in favour and 18.58% against. The recalibration results in a 5% increase.

Fixed remuneration

From 2025 onwards, the chair of the Managing Board and the other statutory members of the Managing Board appointed by the shareholders are entitled to a maximum remuneration of €348,778 for the chair and €296,461 for the other members of the Managing Board. The amount includes a conversion of the variable remuneration that was abolished as of 1 January 2019. The maximum remuneration is indexed annually in accordance with the structural salary adjustment as stated in the collective labour agreement (CLA) for the banking sector. Following the adoption of the 2025 remuneration policy for the Managing Board, including indexation for that year, the total fixed remuneration amounts to €350,522 for Lidwin van Velden and €297,944 for the other members of the Managing Board.

Pensions

Our Managing Board members, along with our employees, participate in a group pension plan. The plan has been administered by a premium pension institution (PPI) as of 1 January 2020 (PPI).

As of that date, a new five-year contract was signed, under which the old defined benefit scheme was replaced by a defined contribution plan. For this, we pay, as an employer, a monthly premium to the administrator, which the employee saves for a pension benefit on the date of retirement. We have agreed on compensation for the non-contributory entitlements of employees determined as at 31 December 2019, which will not change in the

future. The pension plan requires participants to make a contribution, as was the case in the previous scheme, of 3%. The employer's pension contribution is based on a graduated age-based scale.

With effect from 1 January 2026, a new pension scheme will apply to new employees, including members of the Managing Board, in accordance with the Future Pensions Act.

Other terms of employment

Managing Board members are entitled to an electric car or, if they do not wish to use one, are granted an allowance as part of the bank's car scheme. The organisation will pay all costs related to the purchase and use of an electric car. The tax addition is carried by the Managing Board members themselves. All other terms of employment for members of the Managing Board are in line those of other employees.

REMUNERATION MANAGING BOARD

Lidwin van Velden, a member of the Managing Board since 1 January 2010, has served as chair since 19 April 2018. Under the 2025 remuneration policy, she receives a maximum total remuneration of €350.522. This amount includes the conversion of variable remuneration into a fixed allowance, effective from 1 January 2019.

OVERVIEW REMUNERATION OF MANAGING BOARD MEMBERS

(in thousands of euros)	Fixed remuneration	Pension contribution	Other
2025			
Lidwin van Velden	345	53	94
Ard van Eijl	293	46	50
Wilma Schouten[1)]	168	22	257
Frenk van der Vliet[2)]	298	48	297
Total	1104	169	698

1) Wilma Schouten stepped down as CFO on 1 August 2025 and received compensation payment of €153,000 for the remainder of the year. She also received a payment of €85,000 upon stepping down. These amounts are included in the 'Other' column.
2) Frenk van der Vliet stepped down as CCO with effect from 31 December 2025 and received compensation payment of €232,000. This amount is included in the 'Other' column.

(in thousands of euros)	Fixed remuneration	Pension contribution	Other
2024			
Lidwin van Velden	320	52	84
Ard van Eijl	272	45	50
Wilma Schouten[1)]	159	22	17
Frenk van der Vliet	286	48	61
Total	1037	167	212

1) Appointed as a statutory member of the Managing Board as of 1 June 2024.

The other members of the Managing Board receive a maximum total remuneration of 85% of the chair's maximum remuneration, which amounts to €297,944.

Pension contribution includes compensation Defined Contribution scheme 2020. In 2025, this amounted to €6,000 (2024: €6,000) for Lidwin van Velden, €7,000 (2024: €6,000) for Frenk van der Vliet and €8,000 (2024: €8,000) for Ard van Eijl. Wilma Schouten did not receive such compensation as she was not employed by NWB Bank in 2020.

Other

'Other' includes the following remaining remuneration:

1. a partially taxed expense allowance of €2,800 (2024: €2,800) for Lidwin van Velden, Ard van Eijl and Frenk van der Vliet. Wilma Schouten received €1,600 in proportion to her period of employment;
2. an allowance under the staff mortgage interest discount plan: nil for Lidwin van Velden (2024: €3,000), nil for Ard van Eijl (2024: €4,000) and €3,000

Wilma Schouten (2024: €3,000). Frenk van der Vliet does not participate in this scheme;

3. a contribution for the maximisation of pensionable income (€137,800): for Lidwin van Velden €45,000 (2024: €34,000), for Frenk van der Vliet €29,000 (2024: €27,000), for Ard van Eijl €24,000 (2024: €20,000) and for Wilma Schouten €14,000 (2024: €12,000);
4. compensation for the harmonisation of the pension plan as of 1 January 2015: for Lidwin van Velden €11,000 (2024: €10,000), for Frenk van der Vliet €13,000 (2024: €12,000) and for Ard van Eijl €4,000 (2024: €3,000). Wilma Schouten does not receive this compensation;
5. as of 31 December 2019, compensation has been granted for certain non-contributory entitlements of Managing Board members, which will not change in the future. In 2025, for Lidwin van Velden this amounted to €16,000 (2024: €15,000), for Frenk van der Vliet €9,000 (2024: €9,000) and for Ard van Eijl €8,000 (2024: €7,000). The compensation is not applicable to Wilma Schouten;
6. the value attributed to private use of the company car. This value is equal to the related tax addition and for Lidwin van Velden amounted to €19,000 (2024: €18,000) and for Frenk van der Vliet €11,000 (2024: €11,000). Ard van Eijl receives a cash contribution of €12,000 (2024: €12,000) under the car scheme and Wilma Schouten had a car at her disposal but does not use it privately.

EMPLOYEE REMUNERATION POLICY

The employee remuneration policy applies in full to all our employees, regardless of their positions or job levels. As an employer, we apply the CLA for the Dutch banking industry. The fixed remuneration for our employees comprises 12 monthly salaries, 8% holiday allowance, and a 13th-month salary payment. Indexation is in line with the structural salary adjustments set out in the CLA for the banking industry. Employees also receive an allowance of 10.745% in addition to their salaries, in connection with the abolition of variable remuneration. This allowance is not pensionable.

NWB Bank has a gender-neutral remuneration policy and aims to pay employees working in similar positions equally. In 2025, a job classification system was introduced to enhance transparency. This system enables more effective, systematic monitoring of potential pay disparities between men and women and supports compliance with the Pay Transparency Directive.

The remuneration policy has been updated in line with the five-year review cycle and adopted by management. There are no material substantive changes, except for the inclusion of a requirement that the Supervisory Board approve any material deviations from the remuneration policy, in accordance with applicable laws and regulations.

Pensions

The group pension plan for employees is similar to that for Managing Board members as described above. The pension costs consist of the following components: 'Defined Contribution (DC) plan cost up to €137,800 less employee contribution', 'any employer contributions above €137,800 less employee contribution', 'pension compensation (2.8% contribution on pensionable salary in 2025)', 'pension compensation for the harmonisation of the pension plan as of 1 January 2015', 'DC plan compensation' and 'average salary supplement'.

Other terms of employment

Our employees receive various secondary terms of employment, such as the reimbursement of study expenses, a bicycle plan, a staff mortgage interest discount plan and supplementary disability insurance. Employees whose positions justify participation in NWB Bank's electric car scheme may do so or are entitled to an allowance under the scheme.

Pay ratio

The ratio of the compensation of the chair of the Managing Board, as the highest paid employee, to the median of all other employees of the organisation in 2025 was 4.4 (2024: 4.1). Total remuneration consists of fixed remuneration, as well as all other remuneration components, including pension, pension compensation, car allowances, and car tax additions, in line with CSRD requirements.

REMUNERATION OF THE SUPERVISORY BOARD

The compensation of the Supervisory Board was last reviewed at the Annual General Meeting (AGM) on 20 April 2023. This evaluation is carried out every five years.

On the advice of a specially appointed shareholders' committee, the 2023 AGM decided to adjust the remuneration of the Supervisory Board by adopting a ratio that creates a fixed relationship between the remuneration of the chair of the Managing Board and that of the Supervisory Board. The ratio is 15% for the chair of the Supervisory Board compared to the maximum remuneration of the chair of the Managing Board and 10% for the members of the Supervisory Board. This adjustment was introduced with retroactive effect from 1 January 2023. The next evaluation of the compensation of the Supervisory Board will take place in 2028.

With effect from 1 January 2023, the following compensation structure applies to the members of the Supervisory Board, with the amounts being indexed to the structural income adjustment in accordance with the CLA (4% from 1 January 2025 and 1% from 1 July 2025).

(in thousands of euros)	2025	2024
Chair + committees	52	48
Vice-Chair + Remuneration and Appointment Committee	34	32
Member + Audit Committee + Risk Committee	34	32
Member + Remuneration and Appointment Committee	34	32

The above amounts include expense allowances but not travel cost reimbursement.

There are no variable components or option schemes in the remuneration of our Supervisory Board.

On an individual basis, the remuneration of the members of the Supervisory Board is pro rata to the period of appointment:

(in thousands of euros)	2025	2024
Joanne Kellermann	52	48
André ten Damme	34	32
Geert Embrechts [1]	34	20
Toon van der Klugt	34	32
Frida van den Maagdenberg[2]	9	32
Caroline Oosterloo	34	32
Maarten Otto[3]	25	-
Annette Ottolini	34	32
Manfred Schepers[4]	-	9
Total	256	237

1) Geert Embrechts joined the SB on 13 May 2024.
2) Frida van den Maagdenberg was part of the SB until 17 April 2025.
3) Maarten Otto joined the SB on 17 April 2025.
4) Manfred Schepers was part of the SB until 4 April 2024.

The above amounts do not include travel cost reimbursement. Value-added tax (VAT) has not been included since 2021, as a policy rule from 28 April 2021 stipulates that Supervisory Board members do not (no longer) have to charge VAT on the remuneration they receive.

CORPORATE GOVERNANCE

Corporate governance is about the good management of companies and their supervision. It governs the relationship between directors, supervisors and shareholders. For NWB Bank, this means sound, transparent corporate governance focused on long-term value creation and the interests of all our stakeholders, especially given our special societal responsibility as a bank of and for the public sector.

GUIDELINES

The Supervisory Board and the Managing Board are jointly responsible for good corporate governance and compliance within the bank. This responsibility is partly laid down in legislation, such as the Financial Supervision Act (Wft), and partly based on self-regulation. In this section, we outline the key regulations and explain how we apply them.

Dutch Corporate Governance Code

The Dutch Corporate Governance Code (hereafter: the Code) contains principles and best practice provisions that govern the relationships between the Managing Board, the Supervisory Board and the (General Meeting of) shareholders. The Code applies to Dutch companies whose shares are listed on the stock exchange. Our bank's shares are not listed, which is why we are not required by law to apply the Code. Nevertheless, we apply the Code to the greatest extent possible, taking into account that shares in NWB Bank can only be held by the State of the Netherlands, water authorities and other legal entities governed by public law. The application of the Code is also in line with the Policy Document on Minority-State-Owned Enterprises (Nota Deelnemingenbeleid Rijksoverheid), which we follow as far as possible, given our position as a minority state participant.

The charters of the Supervisory Board and its committees are reviewed annually. These charters set out arrangements relating to composition, division of responsibilities and working methods. They also include provisions on conflicts of interest, relationships with the Managing Board and shareholders, sustainable long-term value creation, ESG, and the expansion of reporting on diversity and inclusion. In addition, attention is given to behaviour and culture in the evaluations of the Managing Board and Supervisory Board, the clarification of reporting lines, and the assessment of the internal audit function. The Executive Committee Charter was updated on several points at the end of 2025; the other charters were last updated in March 2023. In light of the planned update of the EBA Guidelines on internal governance and the intended revision of the articles of association, NWB Bank's charters will be updated as required in 2026.

NWB Bank deviates from the Code on the following points:

- Due to our bank's two-tier board structure and the absence of share certification, the principles and best practice provisions relating to one-tier boards and the certification of shares do not apply.
- The best practice provisions on disclosure and information to the General Meeting of Shareholders are not fully formalised, as we do not have listed shares. As a result, we have not adopted a policy on bilateral contacts with shareholders.
- As the bank has only registered shares, all shareholders are known. We keep a register with the names and addresses of our shareholders, the date of acquisition of the shares and the amount paid for each share. We maintain direct contact with our shareholders throughout the year.
- The Corporate Governance Code 2025 extends responsibility for risk management through the introduction of a Risk Management Statement

(Verklaring Omtrent Risicobeheer, VOR), which will apply to listed companies from the 2025 financial year. NWB Bank is considering voluntary application.
- In the absence of variable remuneration, we have not performed scenario analyses for the remuneration policy.

Future-Oriented Banking

Since its publication in 2014, we have adhered to the Future-Oriented Banking package, a set of self-regulatory rules issued by the Dutch Banking Association (NVB). The package consists of three sections: the Social Charter, the Dutch Banking Code and the Code of Conduct. The Social Charter describes the role banks should fulfil in society and the shared values of the banking sector. The Dutch Banking Code safeguards good governance by all Dutch banks and sets out principles for the controlled and ethical conduct of business and effective risk management as well as for the structure of the Managing Board and Supervisory Board. The Code of Conduct provides guidelines for employees on practicing their profession prudently and ethically. The principles of the package are integrated into our organisation's mission, core values and codes of conduct.

In 2014, the Banking Code was supplemented in two ways: by provisions on safeguarding societal interests (Banking Code, page 4) and on the creation of remuneration policies (Banking Code, page 13). We are already putting the first of these into practice: the requirement that stakeholder interests are identified and carefully weighed when formulating strategy, objectives and policies. We have not yet implemented the second, as we have just adopted a new remuneration policy in 2025.

Other guidelines

In addition to the Dutch Corporate Governance Code and the Future-Oriented Banking package, we apply the guidelines of the European Banking Authority, European Securities and Markets Authority, ECB and Bank for International Settlements.

NWB Bank's tax strategy is aimed at strict compliance with tax laws and regulations, taking into account not only their literal wording but also their intent and scope.

STRUCTURE

The corporate governance structure of our organisation is as follows.

Supervisory Board

The Supervisory Board independently oversees the strategy and its implementation, with a strong focus on long-term value creation. The Supervisory Board has a balanced, expert and diverse composition.

Profile

We have a general profile for the composition and appointment of our Supervisory Board members. This was last updated as part of the review of our corporate governance with laws and regulations at the end of 2021. In addition, we draw up an individual profile for each vacancy on the Supervisory Board that fits within the general profile. Supervisory Board members should have an eye for (international) social, economic, political and other developments relevant to NWB Bank. They must also be able to assess these developments.

Composition

At the end of 2025, the Supervisory Board consisted of seven members: four men and three women, representing a ratio of 57% men to 43% women. Each member of the Supervisory Board has the expertise and background required to fulfil his or her role on the Supervisory Board. The Supervisory Board complies with NWB Bank's diversity and inclusion policy. We aim for the Supervisory Board to be at least 30% male and 30% female, with a diversity of skills, backgrounds and experience.

The distribution of expertise on the Supervisory Board is currently as follows. Supervisory Board members Joanne Kellermann (chair), Caroline Oosterloo and Geert Embrechts have extensive financial expertise, a banking background, knowledge of international money and capital markets, experience in prudential supervision and knowledge of risk management. André ten Damme has broad expertise in financial services, financial management and IT management. He is also an experienced supervisor with broad interests across

the financial sector. Toon van der Klugt has broad management experience, extensive knowledge of public policy and a network within the public administration. Annette Ottolini, Frida van den Maagdenberg and Maarten Otto have general administrative experience in the semi-public sector and, in addition, bring expertise in ESG risks as well as knowledge of business operations and outsourcing.

At the Annual General Meeting (AGM) on 16 April 2026, Toon van der Klugt will step down after reaching the maximum term of office. His intended successor will be nominated for appointment at the same meeting. The composition and distribution of the Supervisory Board's committees meet the requirements in the charters. An overview of the areas of expertise is provided in the **Report of the Supervisory Board**.

The composition of the Supervisory Board ensures that its members can act independently and critically toward one another and the Managing Board. The requirements for independence are therefore standard in the general profile for the composition of the Supervisory Board and the appointment of its members. At the start of every meeting, the Supervisory Board assesses whether a conflict of interest is anticipated. In doing so, it emphasises the importance of independence.

The annual review of the bank's corporate governance against laws, regulations and guidelines in 2025 showed no reason to make further refinements to the charters of the Supervisory Board or its committees.

Managing Board

The day-to-day management of our bank is in the hands of the Managing Board. The AGM appoints the statutory members of the Managing Board for a period of four years on the recommendation of the Supervisory Board. In principle, the Managing Board consists of four members, including Lidwin van Velden (CEO), Ard van Eijl (CRO) and Frenk van der Vliet (CCO)[2]. CFO Wilma Schouten stepped down in August 2025. A successor has been identified and will be proposed for appointment in the AGM on 16 April 2026.

The Managing Board operates in accordance with the Executive Committee Charter, which was last updated at the end of 2025. The charter contains rules on the division of responsibilities, working methods and decision-making, rules on conduct and culture, interaction with and information for the Supervisory Board, remuneration policy and conflicts of interest. As with the Supervisory Board, the composition of the Managing Board should align with the organisation's diversity and inclusion policy. We aim for a balanced and mixed composition, including diversity of gender, knowledge and experience. For the Managing Board and senior management, we aim for a composition of at least 30% men and at least 30% women. The current composition of the Managing Board consists of one woman, two men and one vacancy, and therefore meets this target. An individual profile is prepared for each vacancy on the Managing Board, outlining the required knowledge and skills. Each member of the Managing Board must have knowledge of the financial sector in general and the banking sector in particular, the organisation's role in society and the interests of all stakeholders.

Works Council

The Works Council consists of seven members and operates in accordance with the Works Council regulations, which set out rules on composition, term of office, elections and working methods. In 2025, the Works Council set out a number of priorities for its current term, which remained unchanged in 2026. The WC meets every two weeks to discuss employees' interests. Additionally, the Works Council meets with Human Resources once a month to share updates on recent developments.

In 2025, a total of four consultation meetings took place between the Works Council and the Chair of the Managing Board, attended by Human Resources. Two of these meetings were also attended by a delegation from the Supervisory Board (in accordance with Article 24(2) of the Works Councils Act). Following each consultation

2) Frenk van der Vliet stepped down as a member of the Managing Board/CCO in January 2026 after reaching the end of his maximum term. On 8 January 2026, Elvira Eurlings was appointed as his successor.

meeting, the Works Council shares a summary with employees. The Works Council also organises an open consultation hour after these meetings.

Internal auditor

The internal auditor function within our organisation is embedded in the Internal Audit Department. This department strengthens NWB Bank's ability to create, protect and preserve value by providing the Managing Board with independent, risk-based and objective assurance, advice, insight and foresight. Its objective, mandate, position, reporting lines, scope of activities, services and other arrangements are set out in the Internal Audit Charter, which has been approved by the Supervisory Board. The head of Internal Audit reports to the CEO and also has a functional reporting line to the Audit Committee and the Supervisory Board. In 2025, she attended all meetings of the Audit Committee and the Risk Committee and reported periodically to both the Audit Committee and the Supervisory Board. This concerns reports on the outcomes of the audits performed, the progress of management follow-up actions, the implementation of the risk-based audit plan, significant developments and emerging risks. In addition, in line with governance arrangements, a separate meeting was held in 2025 between the Audit Committee and the Head of Internal Audit without the presence of management.

Internal Audit cooperates with second-line departments by observing their activities, preventing overlap and building on their results where appropriate. At the same time, the head of Internal Audit remains fully responsible for substantiating audit findings and opinions. Internal Audit also maintains a close working relationship with the external auditor by coordinating audit plans, sharing findings and reports, and cooperating where necessary. In addition, Internal Audit maintains open contact with regulators and provides reports and information upon request.

Internal Audit operates in accordance with the International Professional Practices Framework of the Institute of Internal Auditors and complies with the code of conduct of the Dutch Professional Organisation of Accountants(NBA) , the code of conduct and relevant quality standards of the professional organisation of IT auditors (NOREA), as well as the NWB Bank Code of Conduct and other applicable policies and procedures. A Quality Assurance and Improvement Programme has been established and is being implemented to assess compliance with these standards and codes, ensure the effectiveness of the function and support continuous improvement.

Gathering information

The Supervisory Board has the option of gathering information from external experts if the performance of its duties so requires. This was not used in 2025. In addition, the Supervisory Board consults internal experts, and the SB obtains information internally by attending discussions between the Managing Board and the Works Council.

External auditor

Like the internal auditor, the external auditor (EY) attended all meetings of the Audit Committee and the Risk Committee in 2025. The external auditor also attended the March meeting of the Supervisory Board at which the annual accounts were discussed. The Audit Committee held one separate meeting with the external auditor in 2025. As part of the mandatory rotation, EY audited the bank's financial statements for the final time in 2025. With effect from the 2026 financial year, PwC will be appointed as the external auditor of NWB Bank, following approval by the AGM on 4 April 2024.

CONTROLLED AND ETHICAL CONDUCT

We ensure controlled and sound business operations in the following ways.

Long-term value creation

Sustainable long-term value creation is embedded in the strategy of the sustainable water bank. More information on this strategy and its implementation in 2025 can be found in the **Strategy and value creation** section.

Risk policy

The policy on the management of financial and non-financial risks and its application in 2025 can be found in the **Risk management** section.

Conduct and culture

The organisation has grown considerably over the past few years. In 2025, the focus was on consolidating and stabilising this growth. Particular attention was given to challenging, strengthening and living our mission, as well as to fostering connection and an open organisational culture. The 'vision quadrant' is the foundation on which we build when it comes to topics such as leadership, diversity and inclusion, development and safety. In this way, we enable our employees to work together to achieve NWB Bank's mission: to invest together in a water-conscious and sustainable society.

The leadership model defines how leadership is understood within NWB Bank. In 2025, managers participated in a 360-degree feedback process to gain insight into their performance against the leadership model's values and identify areas for further development.

The Managing Board and employees enjoyed participating in the fourth edition of the NWB Bank Together Days. These two days focused on collaboration. We devoted significant attention to internal communication. Alongside organising a number of town hall meetings, this ensured that all employees were kept informed about the organisation's goals and results.

An employee satisfaction survey was conducted to identify strengths, shared learning opportunities and areas for improvement. The results were discussed at organisation-wide sessions, within teams and in thematic focus groups. Based on the insights gained, further concrete steps will be taken in 2026.

Banker's oath and rules of conduct

All our employees take the banker's oath upon commencement of employment. This also applies to external advisers who have been working for the organisation for more than three months. Taking and signing the banker's oath subjects them to the banking sector's disciplinary rules. The banker's oath is integrated into the organisation's rules of conduct. This Code of Conduct was updated in 2023 by HR and Compliance, with our vision quadrant also incorporated into the document. The new Code of Conduct was approved by the Works Council at the beginning of 2024 and then given final approval by the Managing Board. We also informed all of our colleagues about this new Code of Conduct.

Compliance and integrity

In line with the Three Lines of Defence model, where each line has a specific role and responsibilities, NWB Bank has placed the compliance function in the second line. The Compliance department's responsibilities are set out in the Compliance Charter, which we update annually. The compliance function focuses on promoting compliance with laws, regulations, internal procedures and codes of conduct that are relevant to the integrity and reputation of the organisation. Compliance acts independently and is not involved in the execution of front-line activities. Organisationally, the Compliance department reports to the CRO and has a direct reporting line to the Managing Board and an escalation line to the Supervisory Board. Compliance reports to the Risk Committee on a quarterly basis.

In 2025, we carried out another thorough systematic integrity risk analysis (SIRA). The results of the analysis provide clear, detailed insight into the integrity risks the organisation may be exposed to. This enables the Managing Board and the Supervisory Board to focus on managing integrity risks within the bank. Managers and their relevant team members have been, and continue to be, closely involved in implementing the SIRA.

We again conducted control monitoring and testing in 2025, including periodic reviews of key control measures related to compliance risks, such as customer due diligence (CDD). These short monitoring and testing cycles show how effectively controls are being applied and where improvements can be made. The results are also used in the SIRA to assess the extent to which identified integrity risks are controlled.

Compliance updated the CDD policy in 2025 and monitored NWB Bank's insider regulations. The Code of Conduct was also updated. As in previous years, Compliance provided internal training in 2025 on various

topics, including CDD and transaction monitoring. New colleagues from Public Finance, Specialised Finance and Treasury, as well as the Managing Board, also participated in an e-learning session on market abuse. Colleagues from various departments who deal with laws and regulations in their day-to-day work took the 'Getting to grips with regulations' training course. Together with Operational Risk Management, the department also organised onboarding sessions for new colleagues at the bank. Attention was also paid to the training of the Compliance team members themselves.

Disclosure of conflicts of interest

The members of the Supervisory Board and the Managing Board have disclosed all their relevant outside activities to the organisation. These are disclosed elsewhere in this report. Where there is a potential conflict of interest in relation to a Supervisory Board member's principal and/or secondary position, the Supervisory Board member concerned does not take part in the discussion or decision. Since the end of 2021, the reporting of potential conflicts of interest has been a standard agenda item at Supervisory Board and committee meetings. There were no reports of (potential) conflicts of interest in 2025.

Diversity and inclusion

As an employer, NWB Bank strives for a balanced composition of employees who complement one another, recognizing the importance of 'diversity of thought' and the need to avoid tunnel vision. To underline this, we signed the SER *Diversity at Work* charter in 2023. In this way, we also communicate our commitment and the importance of a diverse and inclusive workplace externally.

Gender diversity is a key component of this policy. The gender targets for the Managing Board and the Supervisory Board (at least 30% women and 30% men) also apply to senior management. In 2025, the Managing Board comprised 66% men and 33% women, meeting the target. Within senior management, the distribution was 46% men and 54% women. When filling vacancies, preference is given to candidates who contribute to diversity and inclusion, provided they are equally suitable.

Remuneration policy

The remuneration policy and its application in 2025 can be found in the **Remuneration report**.

RISK MANAGEMENT

Our strategy makes high demands on our risk management and internal controls. For this purpose, we use an organisation-wide approach. This chapter provides insights into our organisation's risk taxonomy and how these risks may manifest themselves. The taxonomy is divided into financial risks, non-financial risks and other risks. We review this taxonomy annually based on our risk identification and materiality assessment.

Financial risks include credit risk, interest rate risk, market risk and liquidity risk. The only non-financial risk is operational risk. Other risks include strategic risk, ESG risk and reputational risk.

CREDIT RISK

We define credit risk as the potential impact on earnings/capital due to a deterioration in the creditworthiness of debtors/counterparties. Our risk appetite for this risk is low.

Our policy

Our policy is to maintain the very high creditworthiness of our credit and liquidity portfolios. We grant loans to client groups in the Dutch public sector. This mainly concerns loans to (local) governments or loans guaranteed by them, both directly and indirectly. In addition to water authorities and other branches of local government, our clients are primarily housing associations, healthcare institutions, drinking water companies and renewable energy projects and we finance public-private partnership projects in which the government acts as a principal. We also grant loans to university medical centres and grid operators.

For our liquidity portfolio, we purchase bonds. These are interest-bearing securities, including bonds issued by, or guaranteed by, Dutch authorities, bonds of international organisations and multilateral development banks and covered bonds. We apply the same quality requirements to these bonds as we do to lending in the Dutch public sector. Finally, we enter into derivative transactions (currency and interest rate swaps) with banks and pension funds, which give rise to counterparty credit risk and CVA risk, which are backed by collateral.

As in all previous years, we did not experience a credit loss in 2025. Due to both the public nature and related solvency of the vast majority of our credit relationships, the credit risk of the loan portfolio is limited. This is also reflected in our organisation's robust capital ratios.

We use derivatives to manage interest rate and currency risk. To minimise the counterparty credit risk of these

CREDIT RISK CAN BE DIVIDED INTO THE FOLLOWING SUBTYPES

Subtype	Definition
Credit default risk	Possible impact on profit/capital due to debtors defaulting on their obligations.
Credit migration risk	Possible impact on profit/capital due to deterioration of creditworthiness based on internal/external ratings of debtors or guarantors.
Counterparty credit risk	Possible impact on profit/capital due to counterparties not fulfilling their obligations in derivative transactions.
CVA risk	Possible impact on profit/capital by market-to-market losses in credit valuation adjustments (CVA) on bilateral derivative transactions.
Settlement risk	Possible impact on profit/capital if, during the settlement of a transaction, the counterparty does not fulfil its obligations while the institution has fulfilled its obligations.
Credit concentration risk	Possible impact on profit/capital as a result of credit loss arising from a concentration of exposures on a small group of clients, a group of clients with similar default characteristics or financial assets with high levels of correlation.

derivatives, we only transact with counterparties with at least a single-A rating. This applies to derivatives that are not centrally cleared. We have also put restrictions in place to diversify and maximise risk per counterparty in relation to derivatives.

We enter into agreements with derivative counterparties under the International Swaps and Derivatives Association (ISDA) framework. These agreements concern at least ISDA schedules and credit support annexes (CSAs), for which, on the one hand, netting agreements apply, and, on the other hand, CSAs under which the derivatives are hedged. For the most part, these CSAs have no thresholds and involve a daily exchange of primarily cash as collateral.

Sector challenges

The sectors served by the bank are showing stable development, with sustainability across the portfolio representing a shared challenge. In particular, prospects are more challenging for housing associations, the healthcare sector, grid operators and developments in the renewable energy market. For housing associations, key challenges include the costs associated with sustainability and the delivery of sufficient new housing. The Netherlands faces a significant housing shortage, while the target group for social housing continues to grow. As a result, investments in maintenance, improvement, new construction and sustainability are expected to increase further in the coming years, leading to a substantial rise in financing needs. We finance housing associations on the basis of a full, unconditional and irrevocable guarantee from the Social Housing Guarantee Fund (WSW). The public water sector also faces challenges when it comes to water quality and availability.

The Dutch healthcare sector is also facing major challenges. Population ageing is driving increased demand for care, while a tight labour market and affordability concerns underline the need for reform. We finance healthcare institutions exclusively on the basis of a full, unconditional and irrevocable guarantee from the Healthcare Sector Guarantee Fund (WfZ). Additionally, we finance academic hospitals.

The renewable energy sector faces several challenges. Peak consumption and supply of electricity are growing faster than the capacity of the infrastructure, leading to grid congestion in many places in the Netherlands: a traffic jam on the electricity grid. This congestion can slow down economic development and the construction of new solar and wind farms. Smart solutions in energy storage and conversion can help address the problem and enable a new revenue model. In addition, the number of sustainable district heating networks in the Netherlands needs to increase significantly to reduce dependence on natural gas and further lower CO_2 emissions. The risk profile of heating networks is higher during the construction phase, as significant investments are made while revenues are limited or absent. Delays in realising connections may occur, and the construction of district heating networks has a substantial impact on public space. The new Collective Heat Supply Act (Wcw) aims to support the heat transition, particularly in the built environment, while strengthening safeguards for public interests such as *sustainability*, *security of supply* and *affordability*.

INTEREST RATE RISK

We define interest rate risk as the current or future risk to an institution's earnings and economic value arising from adverse interest rate movements on interest rate-sensitive instruments. This risk is also referred to as interest rate risk in the banking book (IRRBB). Our risk appetite for this risk is medium.

Risks from interest rate fluctuations arise from differences in the interest rates and maturity terms of assets and liabilities. We maintain a prudent policy regarding these risks. We manage the interest rate risk by entering into interest rate derivatives for both the asset and liability sides of the balance sheet. In doing so, we commit to exchanging, at predetermined intervals, the difference between fixed and variable interest rates, calculated based on an agreed principal amount.

As a bank, we are prepared to take a strategic interest rate risk position, if this helps us to achieve a result aimed at realising the benchmark return on equity as

agreed upon with our shareholders. This benchmark return on equity is based on the yield on a 10-year rolling investment in a 10-year Dutch government bond, plus a 100-basis-point surcharge. In addition, a minimum of 3% is used for the benchmark return. Our Fund Transfer Pricing model for pricing new lending is based on this benchmark return. The strategic interest rate position is determined quarterly, independent of any view on interest rates. The basis for calculating, monitoring and controlling interest rate is a sound risk policy, supplemented by a management system that takes into account the effective interest rate of the financial instruments. The Asset & Liability Committee (ALCO) determines the extent of the risks within the set frameworks. For management purposes, we use an interest rate gap analysis, risk measures such as (spread) DV01, earnings at risk and scenario analyses. We subsequently analyse the outcomes of positions taken using profit forecasts, interest margin analysis and performance analysis. This management information is also important for the decision-making processes and the monitoring by the ALCO.

Part of interest rate risk involves refinancing risk. This risk stems from one of the most important characteristics of a traditional banking business: maturity transformation. In our case, we finance our public sector clients mainly with a relatively long maturity. This is related to the long-term investments they make. Although our bank is also in a position to attract funding with long maturity, we do recognise the impact of a potential increase in the funding spread on interest income if there is a maturity mismatch between funding and lending, which may increase the funding spread (and its impact on interest income) when refinancing in the future. We apply a limit system for this, which is described in more detail in the **financial statements.**

INTEREST RATE RISK IS SUBDIVIDED INTO THE FOLLOWING SUBTYPES

Subtype	Definition
Gap risk	The risk arising from the term structure of interest-rate-sensitive instruments due to differences in the timing of their interest rate changes; think, for example, of changes in the term structure of interest rates that occur consistently across the yield curve (parallel risk) or differ periodically (non-parallel risk).
Basis risk	The risk arising from relative changes in interest rates on interest-sensitive instruments that have similar maturities but are priced on the basis of different interest rate indices. Basis risk results from incomplete correlation in the matching of interest earned and paid on different interest rate-sensitive instruments, with otherwise similar characteristics with respect to interest rate changes.
Option risk	The risk arising from embedded and explicit options, where the institution or its client can change the level and timing of their cash flow. In particular, this relates to the risk arising from interest rate-sensitive instruments where the holder is almost certain to exercise the option when it is in their financial interest. It also relates to the risk arising from the flexibility implicit in or provided by the terms and conditions of interest rate-sensitive instruments, where changes in interest rates can lead to a change in the client's behaviour.
Credit spread risk from non-trading book activities (CSRBB)	The risk arising from changes in the market's perception of the price of credit risk, liquidity premium and possibly other components; consider changes leading to fluctuations in price that are not explained by IRRBB or expected default risk.
Refinancing risk	The risk that an increase in the refinancing costs of the liabilities when they become repayable is not offset by corresponding asset income.

MARKET RISK

We define market risk as the risk of losses on on- and off-balance sheet positions resulting from adverse movements in market prices. Our risk appetite for this risk is low.

MARKET RISK CONSISTS OF THE FOLLOWING SUBTYPE

Subtype	Definition
FX risk	The possible impact on profit/capital due to changes in foreign exchange (FX) rates.

Our policy aims to fully cover foreign exchange rate risk for both borrowed and lent funds. In light of our diversified funding sources, we raise a significant portion of our funds in foreign currencies. However, our lending is exclusively in euros. The resulting currency risks are immediately hedged in full by currency swaps.

LIQUIDITY RISK

We define liquidity risk in terms of the potential impact on profit/capital if repayment obligations cannot be met. Our risk appetite for this risk is low.

LIQUIDITY RISK CONSISTS OF THE FOLLOWING SUBTYPES

Subtype	Definition
Funding liquidity risk	The risk that we cannot meet our repayment obligations. This risk also explicitly covers liquidity concentration risk (e.g. concentration of liquidity sources), client withdrawal risk and liquidity risk arising from margin requirements (and movements therein).
Market liquidity risk	The risk of not being able to trade on the market at a reasonable price with immediate effect.

Our organisation has AAA/Aaa credit ratings, which is equal to that of the State of the Netherlands. With this credit status, we are more than able to meet current and future market liquidity needs under normal circumstances. These liquidity needs are almost entirely funded by the international money and capital markets and we do not attract deposits from retail clients. When raising funds, we take into account diversification across geographical markets, investors, currencies, funding programmes and instruments. In the unlikely event of a stagnation in the money and capital markets, we always have ample and sufficient opportunities to repay maturing bonds and to finance new loans. We have an ample liquidity buffer, including a liquidity portfolio consisting of interest-bearing securities, including bonds issued or guaranteed by the Dutch government, bonds issued by international organisations and multilateral development banks, and covered bonds issued by Dutch banks. In addition, a large part of our loan portfolio is eligible for funding against collateral at DNB.

OPERATIONAL RISK

We define operational risk as the risk of losses resulting from inadequate or failed processes, or losses caused by people and systems or external events.

As we aim to be a robust and sustainable public sector bank, our risk appetite for operational risk is low. Our internal organisation, processes and systems are designed to minimise operational incidents and associated losses.

Framework

We have implemented a risk management framework to manage operational risks. The framework ensures consistent terminology and a risk management cycle for identifying, analysing, measuring, monitoring, managing and reporting these risks. We continuously adapt our framework to the internal and external environments to ensure we have good and effective controls.

Within the framework, we use the following instruments to monitor our current risk profile:

- Risk control self-assessments: the first line conducts an annual self-assessment of risks and the effectiveness of processes and controls;
- Key risk indicators (KRIs): for various sub-categories of operational risk, we have established indicators to assess our risk management;
- Incident register and reporting: we record incidents and report them to the Non-Financial Risk Committee (NFRC), which discusses the incidents and any measures to prevent similar incidents;
- Control monitoring & testing: the first line performs regular monitoring of defined key controls. Compliance and Operational Risk Management review the operation and documentation of these key controls;
- Non-financial risk report: we provide an integrated non-financial risk report to the NFRC and the Managing Board.

Our bank's operational risk management is structured in accordance with the Three Lines of Defence model. The first line is responsible for controlling the operational risks in our primary processes. The second line monitors the effectiveness of risk management by setting frameworks and providing advice and monitoring. This second line consists of the Compliance and Operational Risk Management departments.

The IAD is the third line and has an independent role within the bank. The IAD assesses the management in the first and second lines of the risks that are related to

our activities. A continuous dialogue about operational risk takes place throughout the year. The results of this dialogue and the results of our operational risk management are periodically reported to the Managing Board and the Risk Committee.

Key developments

The risks of cybercrime continue to increase in scale and complexity, driven by geopolitical tensions and rapid technological change. The number of threat actors is growing as barriers to launching cyberattacks decline. The emergence of generative AI further amplifies this risk by enabling faster development and refinement of attack methods. To strengthen the management of these risks, a Security Operations Centre (SOC) was implemented in 2025.

Supported by an external specialist, the SOC enables continuous monitoring of security threats, faster incident detection and effective response. Through 24/7 real-time monitoring, advanced detection techniques and structured incident response processes, the bank is enhancing its resilience to both internal and external threats.

Regulatory initiatives such as the Digital Operational Resilience Act also require a more proactive approach to managing cyber, ICT and data-related risks. In response, NWB Bank continued to strengthen its IT control framework to structurally and demonstrably improve risk management. This includes expanding and tightening control measures, improving IT processes and periodically testing their effectiveness.

OPERATIONAL RISK RECOGNISES THE FOLLOWING SUBTYPES

Subtype	Definition
Human capital risk	The risk of not being able to attract, develop, retain and appropriately reward competent employees, including talent to shape and build the bank's business.
Business continuity risk	The risk of direct or indirect damage as a result of the discontinuation of (critical) business processes or systems for a period longer than the defined maximum downtime, due to internal or external events.
Business operations risk	The risk of direct or indirect damage as a result of inadequate or failing processes, whether in implementing or changing processes.
IT risk	The risk of disruption to (IT) business systems or applications due to inadequate or failing IT systems, processes or infrastructure.
Data management risk	The risk of inadequate decision-making based on inaccurate and/or incomplete data resulting from the failure to effectively and efficiently manage data, data quality and/or data knowledge throughout the data life cycle, including when data is obtained, created, processed, used, shared, accessed, stored and/or deleted.
Regulatory compliance risk	The risk of failing (intentionally or negligently) to comply in a timely manner with laws, regulations and other rules that apply to the bank, its business activities, employees and products or services.
Conduct risk	The risk arising from inadvertent or negligent failure to comply with professional obligations, conflicts of interest and/or improper business or market practices and/or improper governance structures and/or inappropriate, unethical or unlawful behaviour by management or employees (socially unacceptable behaviour).
Model risk	The risk of inappropriate decision-making, based on model output, due to errors in the development, implementation or use of such models.
Financial crime risk	The risk of involvement in crimes related to money laundering, terrorist financing and sanctions evasion, corruption and bribery, tax integrity and market abuse (including insider trading). This risk often arises from a failure to comply with requirements to prevent and detect these crimes. Factors such as products, channels, clients, countries, employees and third parties can play a role in this risk.
Outsourcing and third party risk	The risk that an (important) outsourcing or third party will fail to meet its (contractual) obligations, including but not limited to operational (risk) management, adequate (digital) resilience and/or adequate security.
Legal risk	The risk that agreements, claims or disclosures could potentially result in damage to NWB Bank's brand and reputation, legal sanctions or liability resulting in financial loss.
(Non-)financial, regulatory reporting and tax risk	The risk of inaccuracies in the reported ((non-)financial, regulatory) information; the risk that the bank's (future) reported profits change without changing the (economic) value of NWB Bank; and the risk of not complying with tax laws in a timely and effective manner, resulting in fines (penalties), interest and legal costs imposed by the tax authorities on taxes arising from the organisation's activities.
Fraud risk	The risk arising from (1) acts of fraud, misappropriation of assets or circumvention of regulations, laws or company policies involving internal parties and/or third parties and/or (2) exceeding authority in entering into, authorising or failing to report a transaction or deliberately misrepresenting functions and/or (3) deliberate damage to systems (hardware and/or software) by internal personnel through acts or omissions, theft of data.

Fraud assessment

We assess fraud risk as part of the operational risk framework. This assessment is carried out in the context of the systematic integrity risk analysis (SIRA) based on the risk scenarios. This analysis is carried out annually.

Compliance

We take our reputation as a solid bank with integrity seriously. Compliance and integrity are, therefore, important areas of attention within our bank. We want to leave our clients and investors feeling absolutely certain that they can use our services or store their funds with us safely and with peace of mind.

Supervisory Board members, members of the Managing Board and employees have taken the banker's oath (which comes with related rules of conduct and disciplinary rules), in accordance with the official rules on oaths and commitments within the financial sector, as well as the Banking Code. We also have a **Code of Conduct (in Dutch)** that forms part of the employment contracts for our employees.

We have a second-line compliance function with two core tasks: promoting and monitoring compliance with laws and regulations (both internal and external), and promoting integrity. The compliance function reports directly to the CRO and has direct access to the chair of the Supervisory Board.

Laws and regulations are increasing in both volume and complexity. And the number of rules and requirements set by regulators is also increasing. This increases the pressure on managing compliance risks. We have a regulatory team to identify developments in laws and regulations, share information about that and take appropriate measures. The compliance function plays a coordinating role within the regulatory team.

In recent years, we have further strengthened the compliance function and optimised several processes, including CDD and transaction monitoring. This confirms how seriously we take compliance work.

STRATEGIC RISK

We define strategic risk as the risk of not achieving the strategic objectives we have formulated. Strategic risk may arise from the pursuit of inadequate objectives, making mistakes, under-implementation of decisions, inadequate allocation of resources or from a failure to respond adequately to changes in the business environment. Our risk appetite for this risk is low.

The Managing Board and the Supervisory Board have formulated a number of strategic frameworks within which the organisation must operate in order to create value for our clients, shareholders and other stakeholders. An important starting point in managing strategic risk is maintaining our high-quality risk profile. To continue serving our clients optimally, it is important that our credit ratings remain comparable to those of the State of the Netherlands. Our ratings depend largely on the public sector profile of our shareholders and clients, in combination with our strong solvency. We closely monitor external factors that could influence this. If necessary, the Managing Board makes timely adjustments to our strategy. As a promotional bank dedicated to the Dutch public sector, it is important to respond proactively to the public sector's changing and the societal challenges. If government policy on financing the Dutch public sector were to change, it would also affect us. We maintain continuous, constructive dialogue with our stakeholders on this issue. Finally, the changing legislation and regulations for financial institution is another important focus area. The Managing Board is responsible for managing strategic risks.

In response to the evolving geopolitical landscape, an internal working group was established in 2025, comprising representatives from several departments. The group was tasked with assessing the potential impact of these developments on the bank, using the Clingendael Institute's Strategic Monitor 2025–2030 as a starting point. Based on this analysis, the working group developed scenarios relevant to NWB Bank, with the most significant organisational vulnerabilities identified for each scenario.

These insights were incorporated into the assessment of risk materiality and risk appetite. Further quantification

of the qualitative findings is carried out as part of the annual ICAAP cycle, including through stress testing.

ENVIRONMENTAL, SOCIAL AND GOVERNANCE RISK

We define Environmental, social and governance (ESG) risk, including climate risk, as the risk that ESG factors negatively affect the strategic goals, the capital position and/or profit of our bank. The concept of double materiality is part of this definition, which means that we not only consider the impact of ESG risks on the organisation, but also explicitly consider the impact of our lending on people and the environment, which may in turn affect the organisation. ESG factors manifest themselves in both financial and non-financial risks. This section provides an overview of our ESG risk management framework.

Governance

ESG risk management is a shared responsibility within the organisation. We regularly assess our processes, capacities and resources for managing ESG risks. The responsibilities for ESG risk management are assigned within the Managing Board and the Three Lines of Defence model. Responsibility for setting frameworks, policies and monitoring ESG risk management falls explicitly within the second line. The first line is responsible for analysis, customer due diligence (CDD) and engagement, and monitoring of sustainability targets, reporting and disclosure. The third line conducts independent reviews and assessments. Decision-making on ESG risks takes place at the Managing Board level and in existing committees, including the Credit Committee, the ALCO, and the NFRC. The Sustainability Advisory Board focuses on providing strategic advice on various sustainability issues. The bank-wide ESG Accelerator working group also acts as a think-tank and collaborative body to align cross-departmental sustainability issues and ESG data needs.

Strategy

As the sustainable water bank, we have sustainability in our DNA. By financing key sectors such as water authorities and drinking water companies, we have been contributing to climate adaptation and mitigation since our establishment 70 years ago. From a social perspective, our financing of housing associations contributes to the availability of affordable housing for Dutch society. We have included our most concrete objectives and ambitions in our ESG transition plan and its predecessor, the Climate Action Plan. We also regularly review our bank-wide sustainability strategy. In 2022, this led to the formulation of our ambitious goal: an energy-positive loan portfolio by 2035, on our way to climate neutrality by 2050. The bank's sustainability strategy directly informs its ESG risk strategy, with the bank adopting a macroeconomic or systemic view. We see, for example, financing of the water authorities' investments as an important mitigation of climate risks for housing associations. Water authorities build and maintain dikes, pumping stations and flood defences to ensure that housing associations and social housing residents keep their feet dry. ESG risk considerations are integrated into sustainability objectives, including in our ESG transition plan.

Risk management

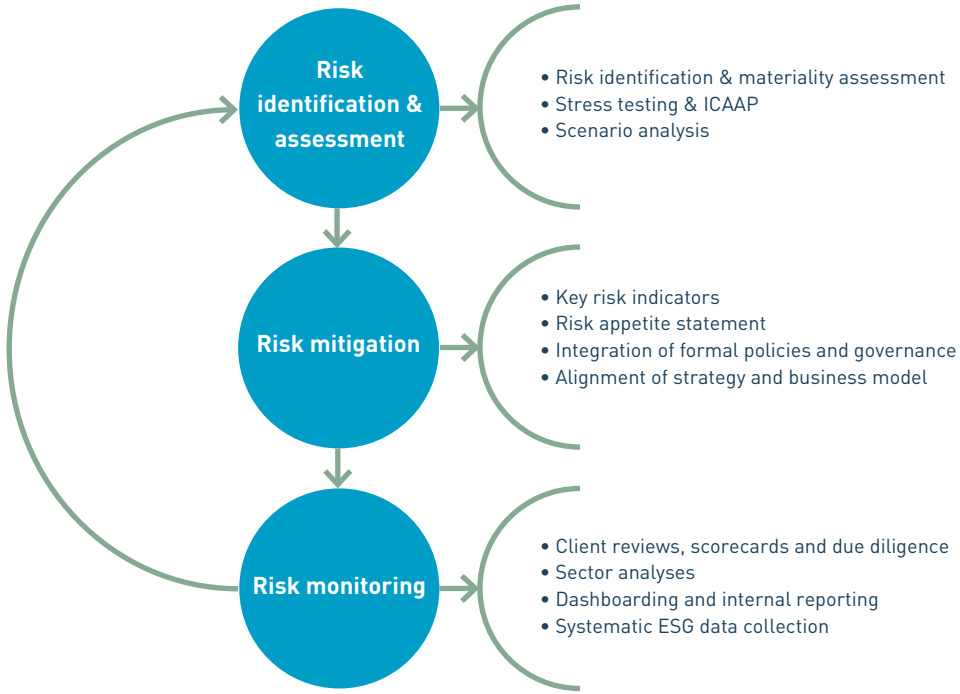
Our ESG risk management cycle is a framework comprised of the various processes and procedures aimed at identifying, assessing, mitigating and monitoring ESG risks.

ESG risk identification

The cycle starts with the ESG risk identification and materiality assessment. During this process, we identify the potential material ESG risks for our organisation. As in the assessment of our impact, we draw on scientific sources, internally collected ESG data, input from clients (external stakeholders) and insights from stakeholder workshops involving internal experts. We identify risks for the short term (< 3 years), medium term (3-10 years) and long term (> 10 years), with a subsequent assessment of the impact on the bank's traditional risk categories through the so-called transmission channels. Transmission channels are the ways ESG risks can affect our clients and us. We foresee a potential material impact on the strategic risk, operational risk and financial risks such as credit risk, interest rate risk and liquidity risk of the bank. For example, drought can damage the foundations of social housing and reduce housing

associations' creditworthiness. In addition, damage to our reputation in the water sector or the inadequate response of our organisation to ESG and sustainability developments can make it more difficult to achieve our strategic objectives or to attract funding.

Potential material ESG risk drivers, which we identify based on our ESG risk materiality assessment (ESG-RMA), include the short-term (< 3 years) physical risk of biodiversity loss. In terms of short-term transition risks, we have identified obligations related to property energy labelling, increasing energy demand, nitrogen emissions, surface water quality and the energy transition. In the medium term (> 3-10 years), we have identified biodiversity loss and a shortage of raw materials as physical risks, and a shortage of social housing and healthcare as social risks. In terms of transition risks, we have identified the energy transition, energy labels, greenhouse gases and surface water quality, among others. Especially in the long term (> 10 years), we see an increase in the materiality of ESG risks. These include the physical risks of raw material scarcity, drought, flooding, biodiversity loss and extreme weather conditions. In terms of transition risks, in addition to those already mentioned, we consider the quality of groundwater and more far-reaching regulations for supply chain management of economic activities. Possible material social risks mainly include a hard-to-access and expensive healthcare system, insufficient (affordable) housing and energy poverty.



ESG risk assessment

We further analyse the impact of the potential material ESG risks on our bank through stress testing and scenario analysis. Stress tests are conducted annually as part of the Internal Capital and Liquidity Adequacy Assessment Processes (ICAAP & ILAAP), the general risk assessments for significant financial institutions, to examine and quantify the impact of ESG risks on the balance sheet. This is done using short-term stress scenarios (< 3 years) based on the identified ESG risks. In addition to determining the impact of these stress scenarios on our capital and liquidity position, over the past two years, we have conducted an in-depth analysis of the impact of flood risk on our largest client group, namely the housing associations. These quantitative exercises are based on ESG data and location data of our clients.

We conduct an ESG scenario analysis for the medium term (> 3–10 years) and long term (>10 years). This is primarily a qualitative exercise, supported by data wherever possible, to assess the long-term impact of ESG risks on the strategy, business model, and business environment of our organisation, as well

as those of our clients. The analysis is based on scientific scenarios developed by institutions such as the Network for Greening the Financial System (NGFS), the Intergovernmental Panel on Climate Change (IPCC), and the Royal Netherlands Meteorological Institute (KNMI). It specifically focuses on our client group and potential material ESG risks. In 2024, we conducted this analysis using the KNMI'23 climate scenarios, incorporating both high- and low-emission scenarios, and taking into account the wetting or drying effects on the Dutch climate. These findings remained representative of the organisation and our portfolio in 2025.

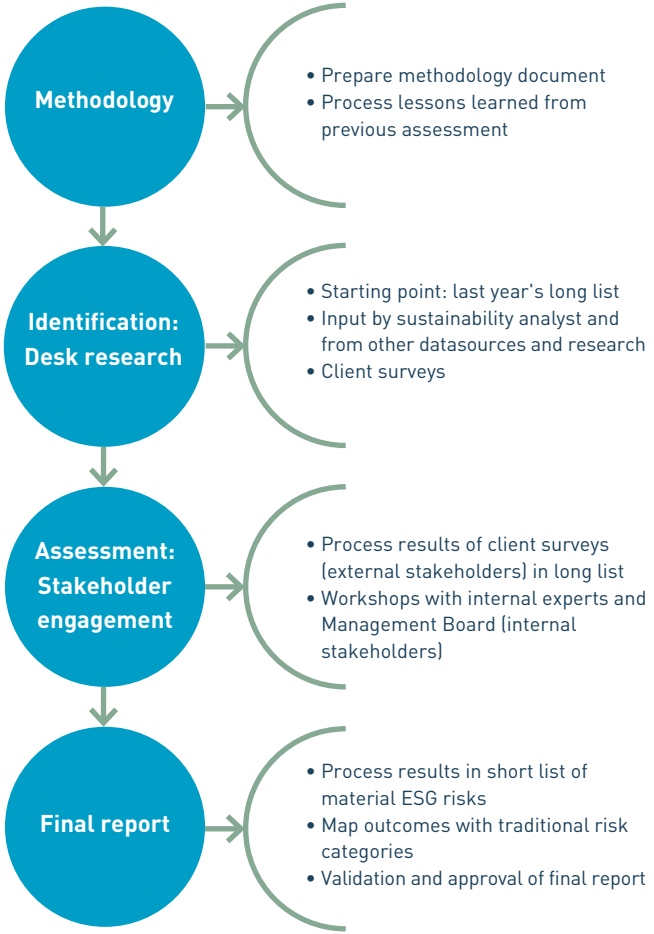
The main purpose of scenario analysis is to determine the impact of physical ESG risks and transition ESG risks in the broader context of strategic and operational risks. The results are incorporated into our strategy cycle, policies and reports, such as the ESG transition plan. Stress testing mainly determines the impact of ESG risks on financial risks, including credit risk, interest rate risk and liquidity risk. In both exercises, we are gradually expanding the scope from physical climate risks to transition, nature-related and societal risks, and they are therefore still very much under development. In this context, the use of ESG data is of great importance. ESG data needs are periodically identified, and processes are initiated to collect ESG data and assess the completeness and quality of existing data.

The results of the ESG risk assessment are the starting point for the DMA. The annual ESG risk materiality assessment identifies the potential material ESG risks for the organisation and our portfolio that could have an impact on both financial (credit, interest rate) and non-financial (strategic, operational) risks. The DMA shows that only the impact of ESG risks, more specifically climate risks (E1), on our credit risk appears to be material, in the sense that the ESG risks could actually lead to an increased credit risk of our portfolio based on available ESG data. This makes the DMA, in fact, a follow-up step to the RMA, only with a more limited scope. The eventual net credit risk of the majority of our credit portfolio is not material, mainly due to government guarantees. The risk assessment of the DMA has also been supplemented with ESG factors that affect our organisation itself and are not part of the ESG risk materiality assessment. Further details are included in the Sustainability Report.

ESG risk mitigation

Effective management of the bank's potential material ESG risks requires a well-defined policy. Our ESG risk management policy outlines the processes we implement to mitigate and monitor ESG risks, as well as the roles and responsibilities of various departments and management. Ensuring that ESG risk management is aligned with the bank's overall business strategy and sustainable impact objectives is crucial. One of the most

ESG RISK IDENTIFICATION & MATERIALITY ASSESSMENT



significant ways we address ESG risks while fostering positive, sustainable impact is through our loans to our client groups. This approach is detailed in our ESG transition plan and is reflected in the follow-up steps we have established to mitigate and monitor ESG risks.

Key Risk Indicators (KRIs) are an important component. We establish KRIs in the annual Risk Appetite Statement to determine our ESG risk appetite. These KRIs define transition paths and targets for key client groups regarding ESG risks that are material to them. The KRIs relate to total CO_2e reduction across the portfolio, energy labels within housing association portfolios, nature within municipalities, and various water authority objectives. They are aligned with our organisation's sustainability standards and regulations, as well as our overall sustainability goals. These KRIs also enable us to monitor the material climate and environmental, physical, and transition risks that we have identified for housing associations, municipalities, water authorities, and the overall portfolio.

ESG risk monitoring

The ESG KRIs also play an important role in monitoring ESG risks. The KRIs are based on data that we update annually and monitor in a dashboard, which allows us to track progress across our portfolio, key client groups and individual clients. This dashboard is regularly included in internal reports to our risk committees and the Managing Board. Based in part on the KRIs, we decide every year which clients and umbrella organisations to engage with – for example, if a sector or client is lagging behind or if they are large, leading clients. You can read more about our engagement strategy in **'Our influence'**.

In addition to the KRIs, we draft sector analyses of our key client groups, including sustainability trends and risks. These sector analyses are also an important input to our individual client reviews. We monitor the credit risk of clients in our portfolio through annual analyses of new and existing clients, using quantitative scorecards and qualitative reviews. Based on available ESG data and expert judgement, we translate material ESG risks into ESG risk variables, which are included in the scorecards and thus integrated into the client's credit risk score. Examples include climate- and environment-related indicators, such as CO_2 emissions and energy labels in housing association portfolios, as well as social indicators, such as patient satisfaction with healthcare institutions and voter turnout in municipalities. We also discuss potential ESG risks and other sustainability issues in our credit analyses and reviews.

REPUTATION RISK

Reputational risk is the risk of damage to our bank's reputation resulting from a specific incident. This can be any type of event, so this risk must be managed alongside all other risks. Reputational risk may result in a loss of our ability to meet our (strategic) objectives because we no longer meet the expectations of our clients, regulators, rating agencies, investors or other stakeholders. Our Managing Board is responsible for managing reputation risk. Our appetite for this risk is also low.

RISK MANAGEMENT FRAMEWORK

We have set out how we have organised our risk management, also known as risk governance, in the risk management framework below. This framework brings together various elements that play a role in our organisation's risk management.

Risk governance

Our strategy makes high demands on risk management and internal controls. We apply an organisation-wide approach to risk management and control. The Managing Board defines the risk management framework and, within this framework, the Asset & Liability Committee (ALCO), Credit Committee, and Non-Financial Risk Committee make decisions about the organisation's risks. To further prevent potential conflicts of interest, additional measures were taken with regard to the ALCO. These included transferring the chairmanship to the CFO, placing capital management under the CFO's remit within Finance & Control, and tightening the ALCO charter.

The Supervisory Board, and in particular its Risk Committee, evaluates the management of risks. This is an important part of its supervisory task.

Risk assessments

We conduct two types of risk assessment.

Internal capital adequacy assessment process

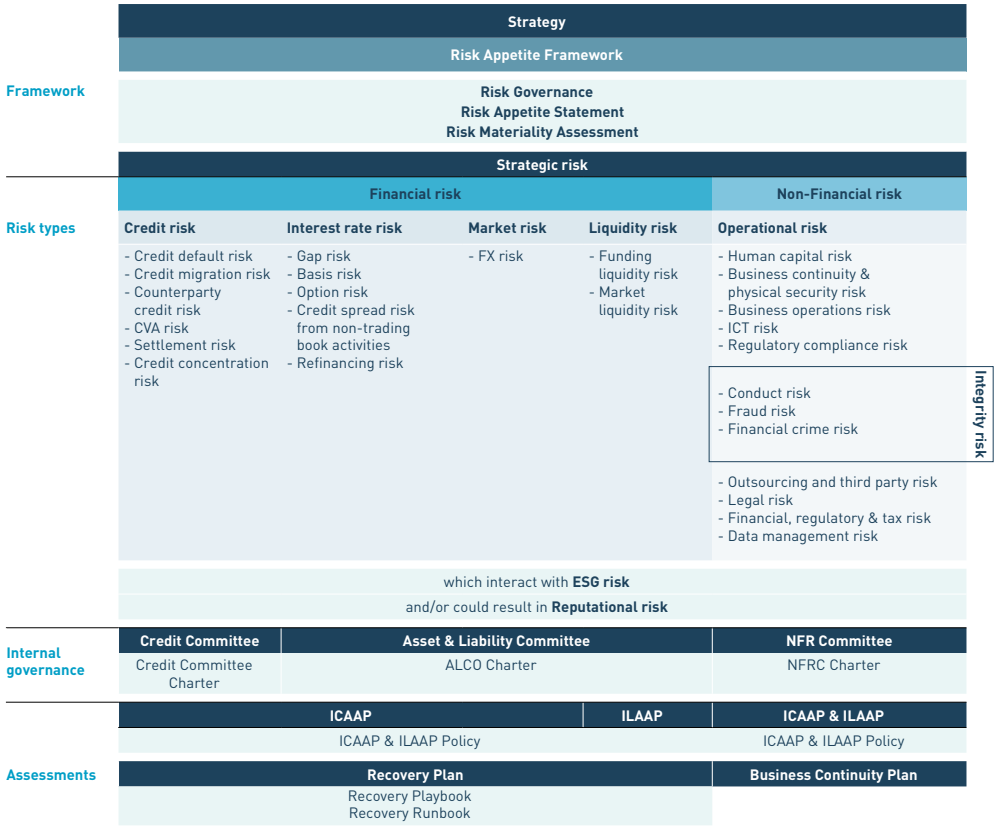
The internal capital adequacy assessment process (ICAAP) is used to determine minimum capital requirements. In this process, we assess our organisation's capital adequacy for each type of risk on a quarterly basis. It is therefore an important activity in the bank's capital management. Part of the ICAAP is to perform stress tests to assess the robustness of our capitalisation.

Internal liquidity adequacy assessment process

In the internal liquidity adequacy assessment process (ILAAP), we internally assess the adequacy of the liquidity position and liquidity risk management. This determines our internal liquidity requirements.

Recovery Plan assessment

As of 2024, we update our Recovery Plan every two years and submit it to the ECB and DNB. This Recovery Plan sets out the measures a bank can take in a severe stress situation, and how it can recover afterwards. A key part of the Recovery Plan is the set of recovery triggers that may prompt the bank to take action. These recovery triggers are consistent with our risk appetite.



STATEMENT OF THE MANAGING BOARD

The Managing Board is responsible for establishing and maintaining adequate internal risk management and control systems within NWB Bank. The effective functioning of these systems is a constant focus of the Managing Board's attention.

The Annual Report provides sufficient insight into the functioning of the internal risk management and control systems and any deficiencies. These systems provide a reasonable degree of certainty that the financial reporting does not contain material inaccuracies. It should be noted that any risk management and control system has inherent limitations and therefore cannot prevent all inaccuracies.

There are no material risks and uncertainties that are relevant in relation to the continuity of the organisation, for a period of 12 months after the report has been prepared. The Managing Board, therefore, considers that the going concern basis for the financial statements is appropriate.

The Managing Board declares that, to the best of its knowledge, the financial statements give a true and fair view of the assets, liabilities, financial position and profit or loss of the organisation. The Managing Board also declares that the Annual Report gives a true and fair view of the position of the organisation on the balance sheet date and of the course of business during the financial year, and that the Annual Report describes the principal risks to which the bank is exposed.

The Hague, 23 March 2026

Managing Board

Lidwin van Velden
Ard van Eijl
Elvira Eurlings

SUSTAINABILITY STATEMENTS

3

GENERAL STATEMENT

- Introduction
- Strategy and management approach
- Our stakeholders
- Value chain and materiality
- Risk management framework
- Due diligence statement and ESG reporting risk

ENVIRONMENTAL INFORMATION

- Climate mitigation
- Climate adaptation
- Energy
- EU Taxonomy
- Water management (entity-specific)
- Biodiversity and ecosystems (entity-specific)

SOCIAL INFORMATION

- Social housing (entity-specific)
- Our own employees

GOVERNANCE INFORMATION

- Financial and Economic crime (entity-specific)

APPENDIX BASIS OF PREPARATION FOR THE SUSTAINABILITY STATEMENTS

- Methodology and estimates
- ESRS-index
- Datapoints that derive from other EU legislation



GENERAL STATEMENT

First, we will explain our strategy and governance structures, then we will discuss environmental issues and social information.

INTRODUCTION

Our mission is to invest with our stakeholders in a water-conscious and sustainable society. Water consciousness and sustainability are in our bank's DNA. We aim to contribute to long-term ecological and social goals, making optimal use of our financing power to achieve this. You can find the details of our mission and strategy in the Report of the Managing Board.

Transparency

NWB Bank places a strong emphasis on transparency. We therefore report in accordance with the European Union's Corporate Sustainability Reporting Directive (CSRD), even though we are not required to do so. The CSRD sets out criteria for standardised and comprehensive sustainability reporting on environmental, social and governance aspects, collectively referred to as ESG criteria. These requirements are set out in the European Sustainability Reporting Standards (ESRS). A distinguishing feature of the CSRD is the requirement of double materiality. Double materiality encompasses both impact and financial materiality. Impact materiality relates to a company's impact on people and the environment, while financial materiality relates to a company's ESG opportunities and risks that have a financial impact, such as revenue growth, profit or loss.

In February 2025, the European Commission published the Omnibus initiative, which aimed to simplify the sustainability reporting requirements under the CSRD. By the end of February 2026, the European Council had given final approval for the simplification of sustainability reporting for companies. The scope of the CSRD has been narrowed by raising the thresholds to include companies with more than 1,000 employees and a net annual turnover exceeding €450 million. Member States may exempt companies that fall outside this scope from the reporting obligation. Based on the current thresholds, NWB Bank is not subject to the statutory CSRD reporting requirement. However, incorporation into Dutch legislation still needs to take place.

The accounting policies for this report can be found in the **Principles** appendix. This appendix provides more information on the key assumptions and methodologies applied, such as the time horizon used.

References

In the Sustainability Statements, we make several references to our ESG transition plan and other parts of our Annual Report.

ESG transition plan

The ESG transition plan outlines the steps we intend to take to contribute to a water-conscious and sustainable society, as well as how we will limit ESG risks for both society and our organisation. The plan contains impact targets in the key areas of climate, biodiversity and water management, alongside action plans for each sector. This policy document contains only additional information and falls outside the scope of EY's assurance statement.

To present information about our business operations as comprehensively as possible, we cover the following topics in the Report of the Managing Board and the corporate governance section.

Requirement	Description	Article	Reference
ESRS 2 GOV-1	Corporate governance	21c	**Composition of the Managing Board**
		22a	**Composition of the Supervisory Board**
ESRS 2 GOV-2	Corporate governance	24	**Supervisory Board Report**
ESRS 2 GOV-3	Remuneration Report	29a, b, c, d, e	**Remuneration Report**
ESRS 2 SBM-1	Strategy and value creation	40g	**Strategy**
		42	**Value creation model**

Scoping

The Sustainability Statements of this Annual Report cover reporting on NWB Bank for the financial year ending 31 December 2025. The Report of the Managing Board, the Sustainability Statements and the Financial Statements have been prepared at the level of the individual entity. In addition to its own operations, certain parts of the Sustainability Statements discuss the bank's value chain and clients. As our organisation has no subsidiaries, we do not apply the exception set out in Articles 19a and 29a of Directive 2013/34/EU. Nor do we make use of the exception for business-sensitive information.

We feel a great responsibility to report on our sustainability performance as comprehensively and thoroughly as possible. This is also what our stakeholders expect from us. Accordingly, we assess impacts, risks and opportunities (IROs) across the entire value chain.

For certain provisions and reporting requirements (E1-09, S1-16) under the CSRD, we make use of the 'quick fix' for the phase-in provisions. This means that the implementation and reporting of these specific requirements have been postponed. Only after one or more years do we have to comply with the following (full) requirements

STRATEGY AND MANAGEMENT APPROACH

This section discusses our strategy in relation to our sustainability goals.

Value creation model

Our value creation model provides a visual representation of the value we add to society and the process behind it. Our strategy is reflected in the different parts of this model: input, business model, output, outcome and impact. The **value creation model** is discussed in the Report of the Managing Board.

Management approach

We have translated our strategy into objectives. The Managing Board sets these objectives in consultation with the Supervisory Board. We communicate transparently about our approach and are accountable to all our stakeholders, including through this Annual Report. Sustainability objectives form an integral part of our strategic goals. Social impact and the management of sustainability risks are integrated into our organisation and processes.

Sustainability is a recurring topic on the agendas of the Managing Board and Supervisory Board. We have a Sustainability Advisory Board that draws up, monitors and amends plans and policies with a direct relationship to sustainability and is also responsible for formulating our sustainability policy. The committee includes ESG experts from various departments and is chaired by the Chief Capital Markets and Lending Officer (CCLO). The SAB advises and reports to the Managing Board, which is ultimately responsible for all sustainability-related policy, direction, and control.

ESG risks are comprehensively embedded in our risk committees: the Credit Committee, the Non-Financial Risk Committee, and the Asset & Liability Committee. This provides management with insight into the ESG risks we face, especially climate risks. We explicitly incorporate ESG risks into our internal governance and risk management processes. All related tasks are assigned within the so-called Three Lines of Defence model:

- The first line includes the Public Finance, Specialised Finance, Treasury, Finance & Control and Legal departments and is responsible for due diligence, individual client assessments, engagement with clients, (sustainability) reporting and disclosure of information, among other things. ESG risk management is carried out by the first line, within the frameworks developed by the second line. The second line also assesses and monitors the development of ESG risks, and advises the first line.
- The second line consists of the Financial Risk Management, Operational Risk Management and Compliance departments. It is responsible for setting ESG risk management frameworks and policies and ensuring compliance with ESG regulations. It also

monitors and determines whether the first line is operating within the agreed frameworks. The Chief Risk Officer (CRO) is responsible for the second line.
- The third line is the Internal Audit Department (IAD), which evaluates sustainability management measures and provides an objective, independent opinion on them, together with opportunities for improvement.

With this governance, sustainability and ESG risk management are explicitly embedded and integrated within all relevant lines and departments of the organisation, involving all management. For information on our general governance, please see **Chapter 2**. It describes the ESG responsibilities of the Managing Board, Supervisory Board and the Works Council in more detail.

To report on and manage our impact, we collect, analyse and store ESG data. With various projects underway in this domain, we have formed an ESG Accelerator working group to coordinate them, bring together knowledge and set priorities. Last year, the ESG accelerator contributed to the implementation of the CSRD. This year, that process has been integrated into the regular activities surrounding the Annual Report. All relevant departments of the organisation are represented in this group. The ESG Accelerator working group reports to the SAB, in which the Managing Board is represented.

Our influence

The ESG impacts, risks and opportunities (IROs) we have identified arise primarily from our financing activities with clients. Financing is the most effective means of encouraging clients to achieve the desired impact, mitigate risks and seize opportunities. We have four instruments at our disposal to encourage clients to take action and meet our goals: engagement, positive and negative pricing, active financing and exclusion. We have also described these options in our ESG transition plan. These instruments act as levers, enabling us to achieve results through indirect influence.

Engagement

We are in constant contact with our clients and sector parties such as umbrella organisations, regulators and guarantee funds. We asked parties from each of these groups for their insights when drafting the ESG transition plan. We hold conversations with them to stay abreast of developments and challenges they face, and to discuss how we can move their issues forward together. During these discussions, we can also make clear which ESG developments we consider important and what we expect from our clients in this regard, such as setting and monitoring targets. We focus primarily on clients for whom our financing is most important. After all, if we fulfil all or a significant portion of a client's financing needs, we are more likely to get a seat at the table to discuss sustainability policies. In addition, we prioritise clients who are frontrunners, laggards or for some other reason have a high impact on ESG topics.

Engagement helps mitigate our risks and increase our positive impact. Normally, engagement takes place with clients who have the greatest impact, but in the future, we may also choose to engage more intensively when we sense a client is lagging too far behind. We can then determine the transition from normal to intensive engagement using KPIs and key risk indicators (KRIs).

Last year, we developed a model for this transition (the Engagement Ladder). If a client poses a higher risk, the Head of Public Finance or the Sustainability Analyst will initiate a discussion. If this proves insufficient, a two-year action plan and biannual consultations will be agreed with the client. If the client still poses a high risk after these two years, a meeting will be held at the management level, together with the relevant guarantee fund, if applicable. The final measure is to consider the conditions for new financing. Threshold values have been defined for each of these steps to determine when to proceed to the next one.

Positive and negative pricing

To help clients become more sustainable, we offer sustainability-linked loans (SLLs). In 2025, we agreed a new SSL with 14 clients (2024: 8). By the end of 2025, 22 loans were linked to sustainability conditions (2024: 8). Under these SLLs, we agree sustainability-related

KPIs with clients in advance. If a client meets the agreed targets, we give a discount on the interest rate. We thus incentivise clients to improve their sustainability performance. We use ambitious and easily verifiable indicators and targets. Wherever possible, we also align with our clients' own ambitions.

To date, we have agreed three KPIs with 22 clients. Of the 66 KPIs, approximately two-thirds relate to environmental themes and one-third to social themes. Most performance agreements concern the energy transition and social housing, followed by climate mitigation, circularity, biodiversity, climate adaptation and our own workforce.

ESG factors are an integral part of our risk considerations and are included in our client analyses and periodic reviews. Depending on a client's creditworthiness, ESG factors may also result in higher credit spreads. Where a guarantee is involved, it is important that the guarantee structure is able to absorb potential ESG risks. We regularly discuss this with relevant stakeholders.

Exclusion

In accordance with our Articles of Association, we provide financing exclusively to activities within or related to the Dutch public sector. We can therefore, in principle, conclude that our clients serve the public interest, which means that the scope for applying exclusion varies per sector. We do use exclusion criteria to clarify what we are definitely not prepared to finance. We choose not to part with clients who are still lagging behind in terms of sustainability. After all, our clients serve the public interest and are committed to sustainability, but they sometimes face dilemmas in terms of priorities, capacity, time and costs. For example, providing healthcare may take priority over sustainability in the short term. We weigh this in our assessments.

Active financing

As a bank for the public sector, it is important to us that there is a clear link with the government in such financing arrangements. This can take the form of a guarantee or shareholding, or an SDE++ subsidy (to stimulate sustainable energy production and the climate transition), for example. To actively finance the energy transition, we set ourselves an audacious goal in 2021: to finance as much sustainable energy as grey energy by 2035.

Budget

These four measures are fully integrated into the organisation. In addition, we spent €0.4 million on ESG data in 2025 (2024: €0.6 million). To process all our ESG data, we invested €0.4 million in 2025 (2024: €0.5 million) in integrating it in our data warehouse.

OUR STAKEHOLDERS

Our stakeholders include our shareholders, clients, investors, employees, industry organisations, regulators and the government, as well as the 'silent stakeholders' nature and the environment. To know what is important to our stakeholders, we stay in regular contact with them. Maintaining, intensifying and expanding the stakeholder network is an ongoing task for management and the relevant departments. In line with their own responsibilities, the departments and their managers also maintain regular contact with stakeholders.





Shareholders

The number of shareholders is limited and manageable, enabling regular personal contact. Formally, a general meeting of shareholders takes place once a year. At this meeting, the Managing Board accounts for the previous year's results and policy. It also explains the bank's strategic developments. An informal interim consultation with the water authorities takes place at least once a year.

The Managing Board also has quarterly consultations with the Ministry of Finance. Corporate social responsibility and the energy transition are priorities in the *Government Participation Policy Memorandum 2022*, the most recent memorandum, which sets out how the Ministry interprets its shareholding in state-owned companies such as NWB Bank.



Clients

We have around 1,000 clients, with all of whom we aim to maintain a long-term relationship that, where possible, goes beyond lending. All our clients are part of, or operate in, the Dutch public sector. As a result, they feel a strong sense of social responsibility, especially when it comes to sustainability. The sustainable character of our organisation stems partly from this. Conversely, in our discussions with clients we consistently draw attention to their responsibility for sustainability, and climate in particular. The Public Finance department's credit management team has an important role to play in this regard.



Employees

Internally, we strive for open dialogue among employees and between our employees, management team and Managing Board. We place high value on an informal, inclusive and open culture. Indeed, the door of the Managing Board is literally and figuratively always open. Several times a year, we organise a townhall session for all employees, during which the Managing Board informs everyone about the annual and half-yearly figures and the outcomes of the annual strategy cycle.

The official consultative body between the Managing Board and employees is the Works Council. Over the past year, discussions covered topics including the pension scheme, the job framework and accommodation. Members of the Supervisory Board also attend the meetings twice a year.

If employees in the organisation unexpectedly identify wrongdoing, they can contact an (external) confidential advisor. We also have a whistle-blower policy, which enables employees to report alleged wrongdoing without jeopardising their legal position.



Industry organisations

In addition to contact with our clients themselves, we have periodic contact with industry associations and assurance institutes of client groups, as well as with the ministries that our client sectors fall under.



Investors

For the most part, we finance our bank on international capital and money markets by issuing bonds and commercial paper. In doing so, we also aim to attract investors who consider not only financial and economic factors but also sustainability issues in their decision-making. Since 2014, we have therefore been active in issuing ESG bonds.

We hold regular discussions with (potential) investors, organised by the Treasury department. The aim is, on the one hand, to explain our organisation's business model, strategy, and activities, and, on the other hand, to listen to what investors consider important.

We actively seek dialogue on sustainability with our investors, and they with us. Investors keep us on our toes and use research and ESG rating agencies to assess sustainability and transparency in our operations and organisation.



Regulators

The Managing Board, management team and some employees have regular discussions with the supervisory authorities. We are supervised by the ECB, the Dutch Central Bank (DNB) and the Netherlands Authority for the Financial Markets. The prudential supervision is intensive, with regulators increasingly calling attention to climate and environmental risks. When there are developments in supervision, we engage in dialogue with the supervisory bodies, both individually and jointly through the European Association of Public Banks and the Dutch Banking Association.



Government

We are a bank of and for the public sector and, partly for this reason, contact with both decentralised and central government is important. We have regular consultations with ministries and provide expertise in policy discussions when requested. One example is the periodic consultation on social housing with the Ministry of the Interior and Kingdom Relations.

As an institution with a banking licence, we must comply with specific laws and regulations. Examples include prudential regulations on capital, remuneration policy and taxation. We therefore regularly consult with authorities at the national and European levels. In doing so, we often join forces with other (public) banks, including through the Dutch Banking Association and the European Association of Public Banks. In this way, we aim to ensure that new or changing legislation and regulations take into account the specific business model of promotional banks such as NWB Bank.



Nature and the environment

Our actions have a direct and/or indirect impact on nature and the environment. Conversely, nature and the environment demand that we adapt our actions, as is evident in phenomena such as climate change. We believe that we must explicitly take nature and the environment into account, which is why we have decided to recognise them as so-called silent stakeholders. As nature and the environment cannot make their own voices heard, we maintain contact with environmental organisations.

VALUE CHAIN AND MATERIALITY

In this section, we explain our materiality analysis and value chain analysis, as well as the results for 2025.

Value chain analysis

The value chain analysis helps identify and prioritise significant impacts, risks and opportunities (IROs) in the value chain by mapping relevant factors relating to both suppliers and end users. These factors include internal processes, supply chains, distribution and the broader environment, including regulations and geopolitical factors. It takes into account both upstream actions involving suppliers and downstream actions involving clients and their value chains.

Our organisation's value chain analysis is based on financial relationships and identifies inputs, outputs, and relationships with key stakeholders. The analysis aims to provide insight into how the business model interacts with external factors as a basis for accurate reporting and strategic decision-making

Our comprehensive value chain analysis shows that we mainly influence, and are influenced by, the following sectors: water authorities, drinking water companies, housing associations, municipalities and local authorities, healthcare and welfare institutions, and sustainable energy projects. We provide these sectors with both project and balance sheet financing. To get a complete picture, we also consider sectors that could potentially have an impact, such as port companies and educational institutions. Additionally, we consider derivative counterparties and suppliers of goods and services. However, the impact in terms of suppliers is limited as we are a small organisation with relatively low levels of direct procurement of goods and services. The suppliers and customers of our clients are also important in outlining how we, as a financial institution, ultimately influence the entire chain from capital to the real economy. This analysis has enabled us to align the most important themes more closely with stakeholders' expectations and needs.

The image below shows the organisation's value chain. This process identifies material topics and the associated policies, including objectives, measures and benchmarks. In 2025, there were no significant changes in the size, structure or ownership of our organisation or its chain.

IMPACT IN THE VALUE CHAIN

International capital markets

Procurement of goods and services



NWB (financing)

Clients (across various sectors) → **End users**

UPSTREAM

OWN ACTIVITIES

Own employees
- Absenteeism
- Gender equality
- Employment conditions
- Performance and development
- Key person risk

Financial & economic crime
- Reputational and enforcement risk

DOWNSTREAM

Climate mitigation
- Greenhouse gas emissions
- Transition risks
- Investments

Climate adaptation
- Flood prevention
- Physical risks
- Investments

Energy
- Renewable energy production
- Transitierisico's
- Investments

Water
- Surface water quality
- Drinking water quality

Biodiversity & ecosystems
- Water ecosystems, land ecosystems
- Land ecosystems
- Investments

Social housing
- Housing construction
- Quality improvement

Environment | Social | Governance

Impact materiality
- positive
- negative

Financial materiality
- opportunity
- risk

Materiality analysis

The materiality analysis determines which topics we report on in the sustainability report. The ESRS use the concept of double materiality. Double materiality involves not only financial materiality but also impact materiality. Impact materiality refers to a company's impact on people and the environment, while financial materiality is about a company's risks and opportunities that translate into a financial impact, such as revenue growth, profit or loss. Accordingly, sustainability topics can take the form of impacts, risks or opportunities, collectively referred to as IROs.

In addition to the axes of financial materiality, impact materiality and the breadth of the value chain, the CSRD is distinguished by the requirement to consider topics over different time frames. Short-, medium- and long-term impacts are considered, outside the period of the financial statements. As we are a lender with a long-term horizon, this aligns well with our internal strategy processes. We define the terms as follows: short <1 year (ST), short-medium 1-3 years (SMT), medium-long 3-10 years (MLT) and long >10 years (LT).

The materiality analysis incorporates direct and indirect stakeholders into the reporting process, providing a comprehensive overview of the entire value chain. This means we consider not only direct stakeholders but also all parties throughout our value chain. We also consider the effects on silent stakeholders, such as nature, which are represented by non-governmental organisations.

We have updated the 2024 materiality analysis. A full analysis was carried out in 2024, which we have reassessed.

Conducting the materiality analysis

In the double materiality analysis, we identify material topics and IROs in four steps. Here we describe the method and assumptions for each step.

Understanding the business context and value chain

To gain insight into our material topics, we started by analysing our **value chain** in depth. This was crucial to better understand the relationships and influences within our ecosystem of clients and stakeholders. The scope of the chain is described in more detail in the next chapter.

Identifying potential impacts, risks and opportunities

The materiality process included an analysis of documentation such as risk assessments and sector-specific analyses, including client scorecards. Sector publications and news reports were also key sources. This analysis was based on the understanding that our primary impact arises from lending to clients in the (semi-)public sector, financing that enables them to carry out their public tasks and activities. Given the scale of our financing, we were able to identify where a significant share of the IROs (impacts, risks and opportunities) is likely to arise. As part of the **value chain analysis**, we identified sectors that received substantial funding. In addition, we identified specific activities, relationships and other factors requiring particular attention due to a higher risk of negative impacts or financial effects, such as financing port areas with intensive industrial activity. As stakeholder engagement is an integral part of our ESG work, no additional engagement was undertaken for this analysis. Instead, the focus was on reviewing relevant literature and substantiating insights derived from discussions.

Impacts were identified based on information from our value chain and third parties. This includes sector publications, news reports, annual reports, publications from research institutes and stakeholder engagement. Based on this information, we linked a list of potential impacts to the ESRS topics. We supplemented this list with entity-specific topics that emerged from our 2024 materiality analysis.

Identifying **financial risks** is a key activity for a financially sound and robust institution. The **ESG risk materiality assessment** (RMA), including the climate resilience analysis, served as the starting point for identifying RMA ESG risks. In the RMA, materiality is defined as the likelihood and potential impact of ESG risks on our organisation and portfolio, as well as their effect on our traditional financial and non-financial risks. First, we linked the material ESG risks to the ESRS themes and

sub-themes. We then used data from credit risk analyses to estimate the sensitivity of clients and sectors to various risks. For instance, we linked data on the energy labels and energy performance of social housing properties owned by housing associations to the climate change theme and its sub-theme of energy. We then estimated the risk per client. Based on this client risk, we included outstanding loans to make a quantitative assessment.

Financial opportunities have been identified primarily from client and sector information. Our analysis follows the organisation's sector, client analyses, and commercial forecasts. Based on the size of and expected developments within a sector, we look at the potential for increasing financing demand in that sector. If there is increasing demand for financing, we can respond and meet that need. This allows us to make more revenue and impact and potentially more profit, keeping in mind that as a public-sector bank, we do not seek to maximise profit.

Interrelatedness is an important aspect of double materiality. To identify any overlap and shortcomings, we compared the outcomes of the IRO processes.

Assessing and determining material topics

Our ESG specialists conducted the assessment and identified the material topics. For impacts, we used the aspects of *scale*, *scope*, *remediability* and *likelihood*, and for risks and opportunities, we used *size* and *likelihood*. A Likert scale from 1 to 5 was applied to each criterion. The scores for each criterion were multiplied for each IRO, resulting in a single total score. Materiality from an impact perspective was then determined based on this total score. A threshold value of 12 was applied. IROs with a score of 12 or higher were classified as material.

Impacts were quantified to the extent possible. Based on available studies and information, we set threshold values for scale and scope for each IRO. For instance, the scale of the positive impact on water safety is defined as the extent to which flood defences meet legal assessment criteria, while the scope is defined as the extent to which the water authorities in our portfolio contribute to this. These normalised scores are then multiplied together. Corrections for recoverability and probability then lead to a final materiality score. We assess all topics with a score above the combined threshold value as material.

Financial risks were quantified using existing scorecard indicators. At the client level, we translated these into an exposure-at-risk score, which can be used to establish a portfolio total that indicates the extent of risk over a given time horizon, by topic and client group.This value is related to a Likert scale.

ESG risks identified in the RMA may be excluded at a later stage in the DMA for sustainability topics deemed material. In the RMA, materiality is defined by the likelihood and potential impact of ESG risks on our organisation and portfolio, as well as their effect on traditional financial and non-financial risks.

In addition to financial risks arising from ESG-related credit risk, this year we also focused on operational risks within the organisation. As a result, the topic 'Financial & Economic Crime' was assessed as material. In the coming years, further research will be conducted to assess the potential financial impact of these risks.

Financial opportunities rely on a qualitative assessment of any increase in financing demand from our current and potential future clients. To differentiate between low, medium and high material issues, we used the same threshold values as for financial risks.

As a financial institution, we constantly monitor the potential effects of ESG issues. While we endorse the importance of vigilance and the major potential consequences of climate change, among other things, we did not see any directly related financial impacts this fiscal year, nor do we expect any material settlement in the coming fiscal year.

Validation

We validated the identified topics in 2024 with feedback from internal and external stakeholders. For this purpose, we approached parties including water authorities, housing associations and drinking water companies in our client portfolio. The outcome of

this validation phase was that the previously defined topics could remain unchanged. This remains an iterative process.

Stakeholder validation was carried out with the most important sectors identified and a number of other key stakeholders, including so-called silent stakeholders. The goal of the stakeholder validation was to gather as much information as possible by conducting both a survey and a substantive conversation. In addition to discussing the material topics the value chain partner had identified, we focused on their interplay with our organisation and how we can support the stakeholder in increasing or mitigating IROs. In these discussions, all stakeholders expressed agreement with the topics presented.

Monitoring and internal validation were important parts of the process, along with compiling and processing the results of the materiality analysis. In a subsequent feedback cycle, we presented our double materiality analysis (DMA) to the ESG Accelerator working group, before internal audit professionals issued an advisory report on the process and methodology that had been followed. After taking the advice and comments into account, the Sustainability Advisory Board validated the DMA, and the result was then presented to the Managing Board. When preparing the report, a further adjustment was made to the DMA, which was approved by the CEO.

Given the limited scope of the changes, the Internal Audit Department and the Supervisory Board did not play any further role in updating the materiality analysis in 2025.

Material topics

Based on the materiality analysis, we identified a number of material topics, which are discussed below. In each case, we briefly discuss the issue's relevance and how we address it. A distinction is made between I (impacts), R (risks) and O (opportunities). In addition, it is indicated where in the value chain the IROs occur – D (downstream) or E (own organisation) – and over what time horizon they arise – HT (<1 year), ST (1-3 years), MT (3-10 years) and LT (>10 years).

positive impact | negative impact | opportunity | risk

Topic	Description of IROs	Type	Position of value chain	Time horizon
	ESRS E1			
	Climate adaptation			
Flood prevention	Impact: Flooding poses a significant risk of damage to large parts of the Netherlands. We have a positive impact on flood prevention by financing water safety through the water authorities. Water authorities invest around €1.7 billion in water safety every year. We aim to achieve a 90% market share in financing water authorities.	+	D	HT, ST, MT, LT
Adaptation risks: flooding, drought, heat stress and extreme weather	Risks due to exposure to adaptation risks (flooding, drought, heat stress and extreme weather), leading to credit risk: Clients are exposed to adaptation risks in multiple ways due to the physical location of their activities. When disasters such as floods, droughts, heat stress or other extreme weather occur, this can lead to disruption. If this affects an organisation's financial health, it creates a potential credit risk for us. However, because the financing we provide is often guaranteed by governments, this risk is largely mitigated.	−	D	HT, ST, MT, LT
Investments in flood defences	Opportunities for the organisation as the financing needs of water authorities grow due to the necessary investments in flood defences: We play a major role in meeting the financing needs of the water authorities. As these parties will have to invest heavily in improving and maintaining flood defence safety in the future, we expect to realise financial opportunities. Flood defences are one of the most important preventive measures for water safety. Water authorities invest around €1.2 billion in flood defences each year to enhance water safety. We aim to achieve a 90% market share in financing water authorities.	+	D	HT, ST, MT, LT
	Climate mitigation			
Greenhouse gas emissions (reduction)	Impact on climate mitigation through financed emissions and their potential reduction: Our lending supports economic activities that generate greenhouse gas emissions. This is primarily linked to the energy use of housing associations for heating and to water authorities' wastewater treatment activities. Over the longer term, we expect our negative impact to decrease and our positive impact to increase as we finance emission-reduction measures. Housing associations allocate 38% of their annual budgets to sustainability investments, while water authorities allocate 35% of their investments into wastewater treatment. We finance these investments.	−	D	HT
Greenhouse gas emissions (reduction)	Risks due to exposure to transition risks related to emissions reduction, resulting in credit risk: Reducing greenhouse gas emissions requires substantial investment by various organisations in our client portfolio. Major reduction challenges lie, among others, with water authorities and housing associations. These investments may affect the financial health of organisations. This gives rise to financial risk for us as a result of our client's credit risk. However, because the financing we provide is often backed by government guarantees, this risk is largely mitigated	−	D	HT, ST, MT, LT
Greenhouse gas emissions (reduction)	Opportunities from growing client financing needs related to investments in insulation, electrification and other sustainability improvements: Within the (semi-)public sector, investment aimed at mitigating greenhouse gas emissions is increasing. For example, we finance heating networks, as well as renovation and insulation projects undertaken by housing associations. Rising demand expands the market for our financing activities. As a significant player in this sector, we expect to realise financial opportunities.	+	D	HT, ST, MT, LT
	Energy			
Financing sustainable energy production and consumption	Impact on sustainable energy production by financing renewable energy projects: Over the years, we have expanded our portfolio of solar and wind farms, as well as heating networks. By providing long-term financing for these projects, we support the stability and investability of the sector. As a result, we have a positive impact on the availability of sustainable energy.	+	D	LMT, LT
High/fossil energy consumption	Potential credit risk as clients face transition risks associated with the energy transition: High energy consumption and reliance on fossil fuels can increase these risks, while grid congestion further complicates the transition. The need to adapt operations and make associated investments may place pressure on clients' financial positions. As a result, we face a financial risk based on the credit risk of our clients. However, as the financing we provide is often backed by government guarantees, this risk is largely mitigated.	−	D	HT, ST, MT, LT

Topic	Description of IROs	Type	Position of value chain	Time horizon
Energy transition	Opportunities as clients' financing needs increase due to investments in renewable energy generation and adaptations to the electricity grid: In the (semi-)public sector, investment in renewable energy is accelerating, alongside the need to align energy consumption with generation. The electricity grid must also be upgraded to accommodate these changes and manage peaks in production and demand. For example, we finance not only heat networks and solar and wind projects, but also grid operators. Growing demand expands the market for our financing activities and, as a significant player in this sector, we expect to realise financial opportunities.	+	D	HT, ST, MT, LT
	ESRS 2 | Entity-specific			
	Water management			
Improvement of surface water	Positive impact on the improvement of surface water quality by financing the water authorities. By financing the water authorities, we contribute to operations and innovations that improve the quality of surface water. In addition, water authorities work towards achieving the objectives of the Water Framework Directive (WFD). Each year, water authorities allocate around 14% of their total investment budgets to water quality. As a bank, we finance approximately 90% of their financing needs.	+	D	HT, ST, MT, LT
Drinking water quality	Positive impact on good drinking water quality by financing drinking water companies: Drinking water companies ensure the supply of reliable, high-quality drinking water by treating groundwater and surface water. We finance at least 33% of the financing needs of drinking water companies.	+	D	HT, ST, MT, LT
	ESRS 2 | Entity-specific			
	Biodiversity & ecosystems			
Quality of surface water ecosystem	Impact on the surface water ecosystem through financing measures taken by water authorities to achieve long-term compliance with the WFD: The quality of Dutch surface water is poor. As the main financier of the water authorities, we are helping to improve water quality.	+	D	MT, LT
Quality of land-based ecosystems	Negative impact on land-based ecosystems due to a lack of biodiversity in areas managed by clients: As a public bank, we finance clients that manage large nature reserves. At present, the quality of ecosystems in such areas is often poor. Through our financing activities, we are indirectly linked to these impacts.	-	D	HT, ST, MT, LT
Quality of land-based ecosystems	Positive impact by financing clients who expand and improve land-based ecosystems within their protected natural reserves: This financing enables clients to manage, expand and connect these areas. This has a positive impact on the quality of ecosystems in these areas.	+	D	MT, LT
Investments in biodiversity	Opportunities as clients' financing needs grow due to the necessary investments in safeguarding biodiversity, mainly among water authorities, drinking water companies and municipalities	+	D	LT
	ESRS S1			
	Own employees			
Gender equality	Impact on the equal treatment of employees regardless of gender: As an employer, we have a duty to ensure gender equality among our employees. The organisation's policies and outcomes in gender equality have a positive impact on employees.	+	E	HT, ST, MT, LT
Working conditions - absenteeism	Impact on working conditions, with a focus on absenteeism due to illness: In recent years, we have seen an increase in illness-related absenteeism. This rate has since declined and now falls within the defined target range.	-	E	HT, ST
Working conditions - terms of employment	Impact on the working conditions of employees through terms of employment, such as the collective labour agreement, employee participation and complaints mechanisms: By offering good terms of employment, the organisation has a positive impacts on its employees.	+	E	HT, ST, MT, LT

Topic	Description of IROs	Type	Position of value chain	Time horizon
Working conditions - performance & development	Impact on employees' working conditions, with a focus on terms of employment, such as performance & development, that promote employee development.	+	E	HT, ST, MT, LT
Key person risk	Risk of not being able to attract and retain enough employees for the bank's operationsThe organisation's dependence on its highly skilled employees poses a potential financial risk. The possible departure of staff, as well as the recruitment and training of new employees, would incur high costs.	-	E	HT, ST, MT, LT
	ESRS 2 | Entity-specific			
	Social housing			
Housing shortage	Impact on the housing shortage by financing housing associations and their construction activities: By financing housing associations, we help them to achieve their goal of building as many suitable homes as possible. Housing associations invest 52% of their funds in new homes each year.	+	D	HT, ST
Housing quality	Impact on the quality of housing through the financing of housing associations: The quality of social housing enables people to live well and enjoy a good quality of life. The financing of housing associations helps make this possible. Housing associations spend around 38% of their annual investment budget on making their properties more sustainable and improving them.	+	D	HT, ST
	ESRS 2 | Entity-specific			
	Governance			
Financial & Economic Crime	Risk of being involved in offences relating to money laundering, terrorist financing, sanctions evasion, corruption and bribery, tax evasion and market abuse (including insider trading: The risk of these forms of financial crime are inherent to the banking sector and may result in fines, reputational damage and associated financial risk. The remaining risk is low and falls within the organisation's risk appetite.	-	E	HT, ST, MT, LT

Differences compared to 2024

There are minor differences compared to the materiality analysis in the 2024 Sustainability Statements. A comparative analysis with the broader financial sector showed that governance issues are more frequently identified as material in that sector. This prompted further analysis. By more explicitly incorporating operational risks with potential financial impacts into the assessment of financial risks, the scope of the analysis shifted. As a result, the entity-specific material topic 'Financial & Economic Crime' was added.

In addition, a number of IROs have been removed based on the refinement of the descriptions of impacts, risks and opportunities. This was mainly due to issues being identified in the value chain that could not, or could only be attributed to a very limited extent, to the actions of us or our customers. Consequently, the negative impacts 'housing shortages' and 'shortages of drinking water' have now been excluded.

Information to report

Identifying material topics is the starting point of the Sustainability Statements. Once we have determined *what* to report on, the next step is to determine *how* much detail is material and, finally, how to present it, i.e. the choices we make in focusing on sustainability issues. In addition to the generally required disclosures, we report relevant data on our policies, action plans, targets and standards in relation to the material topics. Our starting point is the CSRD reporting requirements, although some of these do not fully reflect the reality of our organisation and value chain. In such cases, we apply company-specific reporting criteria, and our reasoning is detailed in the **Index** section.

RISK MANAGEMENT FRAMEWORK

In this section, we discuss our management of ESG opportunities and risks in more detail.

ESG opportunities and risks

Our strategy focuses on maximising opportunities for responsible returns and social impact. At the same time, we need to manage risks to our bank. Opportunity and risk management go hand in hand. As part of our *sustainable water bank* strategy, we have explicitly integrated sustainability (ESG) considerations in recent years. The impacts, risks and opportunities (IROs) have been further elaborated for each material topic.

ESG risk management

ESG risk management is an integral part of our **overall risk management framework**. This framework provides a comprehensive view of how ESG risks are identified, assessed and managed.

Climate resilience analysis

Our climate resilience analysis consists of stress testing and scenario analysis. Stress tests allow us to assess the potential impact of short-term ESG risks on the organisation's funding and lending activities, and whether more capital needs to be held against them. We use scenario analysis to map the impact of ESG risks over the medium and long term, and to examine what measures that both we and our clients can take to manage these risks. For the time being, our stress tests and scenario analyses focus mainly on climate risks, although nature-related risks will be gradually incorporated. To determine the climate change scenarios, we use scientific evidence from reports by the Intergovernmental Panel on Climate Change (IPCC), the Network for Greening the Financial System (NGFS) and the Royal Netherlands Meteorological Institute (KNMI).

In 2024, we conducted a long-term scenario analysis based on the KNMI'23 climate scenarios, which combine the IPCC's high- and low-emissions scenarios with wetter and drier conditions in the Netherlands driven by low- and high-pressure areas. We conducted this resilience analysis together with the Managing Board, the Supervisory Board and client representatives to get the broadest possible picture of how the scenarios could affect our organisation and our clients in the long term, i.e. over at least the next 10 years. It showed the extent to which the problems associated with climate change are linked to the degradation of nature and to both water shortages and surpluses, with a changing political climate and social consequences potentially also playing a role. At the same time, we looked at how we and our clients can respond to these issues to ensure that our strategy remains viable. Cooperation within the Dutch public sector seems essential, and our role as a unique financier within the public and water sectors will only increase. No new analysis was carried out in 2025; the results of the 2024 scenario analysis remain representative.

DUE DILIGENCE STATEMENT AND ESG REPORTING RISK

We conclude the *General statement* with information about our due diligence approach and management of ESG reporting risk.

Sustainability due diligence

The Sustainability Statements describe how we identify, assess and manage material sustainability topics for the organisation. The underlying sustainability due diligence process involves identifying, measuring and assessing potential negative impacts, taking appropriate action, and, where necessary, adjusting the overall strategy.

Customer due diligence

Regardless of their risk profile, we screen new clients and periodically existing clients according to our Customer Due Diligence (CDD) policy. The aim is to combat money laundering, terrorist financing and sanctions evasion. As part of the CDD process, we assess the actual and potential negative human rights impacts of our clients' operations and value chain, based on the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, with the aim of limiting or, better still, preventing abuses. We also assess our clients' operations against the exclusion criteria set out in our sustainability policy. The general CDD policy applies to clients (and their value chains) to whom we extend credit, parties from whom we purchase interest-bearing securities for the liquidity portfolio, and financial counterparties with whom

we enter into derivative transactions. We always screen a new client according to our CDD policy before entering into a transaction.

For our sustainable and project finance activities, we conduct a more in-depth review in the form of an external report, which includes social and sustainability considerations and assesses these projects against the Equator Principles.

The bank's responsible employees receive regular training in customer due diligence. We conduct systematic integrity risk analysis to identify integrity risks and assess the extent to which they can be managed. Where necessary, action is taken and monitored by our Non-Financial Risk Committee. Management and the Managing Board are closely involved in this process. The Managing Board and the Supervisory Board receive reports to support their oversight of integrity risk management.

ENVIRONMENTAL INFORMATION

Climate mitigation ESRS E1



	Achieved		Target	
KPIs	2024	**2025**		
Greenhouse gas emissions (I, R)				
Financed emissions (tCO_2e)	1,496,151	**1,419,003**	**2030**	888,126
Greenhouse gas emission reduction (O)				
Share of electricity financing that is renewable	100%	**100%**	**2030**	100%
Non-IRO-related KPIs				
Share of purchased electricity that is renewable	100%	**100%**	**2030**	100%
Scope 1 and 2 reduction (tCO_2e)	77.4%	**85.1%**	**2030**	65.5%
Scope 3 – liquidity portfolio compliant with SBTi	–	**46.0%**	**2028**	45.6%



Climate mitigation is a material issue for us because our lending significantly impacts greenhouse gas emissions. All the sectors we serve, with the exception of renewable energy projects, are significant net emitters.

Our organisation's impact relates to the financed emissions from our clients' activities and the potential to reduce them. Our lending contributes to economic activities that emit greenhouse gases. This mainly coincides with the energy consumption of housing associations for heating homes and the activities of water authorities in wastewater treatment. In the long term, we expect our negative impact to decrease.

Project example In October 2025, we agreed to a sustainability-linked loan (SLL) with Stek Wonen. One of the three performance targets aims to reduce the housing portfolio's climate impact. Stek Wonen has committed to reducing the climate impact (Scope 1 and 2) from 25,000 tonnes of CO_2 equivalent in 2024 to less than 19,500 tonnes of CO_2 equivalent in 2029. This represents a reduction in climate impact of more than 22% over five years.

Besides the impact, there are also risks to the organisation due to clients being exposed to transition risks relating to emissions reduction, which can lead to credit risk. Reducing greenhouse gas emissions requires significant investment from various organisations within our client portfolio. The water authorities and housing associations, among others, have major reduction tasks. These investments may affect the financial health of the organisations. This means we are exposed to financial risk based on our clients' creditworthiness. However, as the financing we provide is often guaranteed by governments, this risk is largely mitigated.

Our KPIs provide a comprehensive overview of our organisation's and our clients' emissions. They indicate our negative impact through emissions and the related transition risk of our clients, as well as the remaining potential for sustainability and our opportunities in financing climate mitigation.

Policy, action and target

Here we elaborate on our policies and our measures and objectives for climate mitigation.

Policy

In 2019, together with almost the entire Dutch financial sector, we committed to the government's climate targets. As a leading bank for the public sector, we support the principles of the Paris Agreement and therefore consider it important that our business operations contribute to limiting global warming and achieving climate neutrality by 2050. We first outlined these goals and the path to achieve them in 2022.

To achieve our goals, we developed our ESG transition plan. It details our contributions and targets to limit global warming to 1.5°C. The *decarbonisation levers*, a technical term for the measures and strategies we use to mitigate climate change, are described below under the heading *Action*. In developing this plan, we sought alignment the Science Based Targets initiative (SBTi). We analysed the extent to which the climate impact reduction targets of 221 clients (2024: 269) align with the SBTi, based on publicly available policy documents and reports. Our goal is for all relevant clients to have good policies and clear targets for reducing their climate impacts by 2030.

To support this assessment, we used four criteria based on the SBTi methodology:

- a target that aligns with the Paris Agreement;
- a clear delineation of the processes that influence the target;
- quantification and monitoring of climate impacts;
- the use of interim targets to demonstrate commitment in the short or medium term.

If the objectives and interim targets are good and the delineation and quantification are not assessed as weak, we consider climate impact reduction plans to be satisfactory. Of the 221 client assessments conducted in 2025, 43 met these criteria. While most clients have good targets, publicly available information on quantification and monitoring is often limited. Performance against the second and fourth criteria (delineation and interim targets) can generally be described as reasonable.

These analyses provide us with clearer insight into how consistently our clients are reducing their climate impacts and the approaches they are taking. We use the results to engage more intensively with specific clients or sectors where needed. In addition, these insights help us reach our objectives more effectively through knowledge, engagement and financial products.

The ESG transition plan is available on our website and was communicated to our stakeholders at the time of publication. Its implementation involves multiple departments and is aligned with our overall ESG governance. With regard to climate-related topics, the ESG transition plan addresses climate mitigation, climate adaptation and the energy transition.

Approach to emissions of the loan and liquidity portfolio

Our climate target is to have a loan and liquidity portfolio that generates zero net CO_2e emissions by 2050. The loan portfolio also includes our investments in NHG RMBS, with which we aim to help make homes more sustainable. As a milestone along the way, we aim to make our loan portfolio energy positive by 2035: our audacious goal. To ensure our targets remain ambitious and align with the Paris Climate Agreement, we follow the SBTi's guidelines and criteria wherever possible. In 2024, SBTi validated our climate targets for housing, renewables and the liquidity portfolio (financial institutions), confirming that they are as science-based as possible. To reduce emissions in our portfolio, we seek to influence decarbonisation processes in the value chain through engagement, pricing, exclusion and (active) financing. We also report on these efforts.

NWB Bank must comply with the EU's Paris-Aligned Benchmarks (EU-PAB). We meet the criteria for inclusion in these EU standards because we have set science-based targets for Scope 1, 2 and 3 emissions that cover our operations and value chain. Some of our targets have been validated by SBTi and are consistent with the World Resources Institute's (WRI) GHG Protocol to meet the ambitious 1.5°C emissions scenario.

Approach to own emissions [not material]

In line with our strategy and transition plan, we have set ourselves the goal of making our own office building future-proof and more sustainable. With measures such as wall insulation, triple glazing, insulated window frames, convector heaters to replace radiators, a decentralised and a decentralised ventilation system regulated based on CO_2 levels and LED lighting, we now have a sustainable building with an energy efficiency label 'A'. Our vehicle fleet is fully electrified, and we encourage employees to avoid car and air travel and to use public transport as much as possible. There are also many smaller initiatives, such as separating waste for recycling. We aim for the lowest possible emissions in our business operations. We offset the remaining CO_2 emissions to make our operations carbon neutral. To involve employees, we organise regular brownbag lunches where internal and external experts share insights on environmental issues.

Action

To decarbonise our value chain, we focus on engagement, pricing, exclusion and (active) financing. These actions help to reduce our negative impact and lower the associated risk. As they are ongoing efforts of a continuous nature, we do not apply specific timelines to the actions. It is difficult to attribute concrete figures to our actions and actions. This is particularly true of client engagement in reducing scope 3 emissions. Reducing emissions in the value chain is often not directly attributable to specific actions, making further differentiation difficult. In the coming years, we will further elaborate on the relationship between our actions and their effects. We do not expect to apply new technologies to our own organisation's goals in the short or medium term. No additional scenario analyses were performed when setting the targets; instead, the SBTi principles for a 1.5°C-compliant pathway were used.

Engagement

Last year, we analysed the carbon reduction targets of 222 clients. This represents about a quarter of our total client portfolio. We prioritised clients with the highest emissions and the largest outstanding loans. We assessed whether the clients' targets aligned with the Paris Agreement and whether they had committed to appropriate sectoral targets. We also looked at whether the boundaries of the processes affecting the target were well-defined, whether the impacts were clearly reported, and whether there were interim targets. Once the target and interim target are adequate, and the other two criteria are at least not poor, we consider the climate plans sufficient. Of the 222 clients analysed, 43 received a satisfactory score. We now have an overview of all clients with substantial outstanding amounts (over €10 million). In the coming years, we will focus on ensuring that all of these clients have an acceptable climate plan. Rather than expanding the analysis to a large number of smaller clients, we will emphasis active engagement with the clients already assessed.

In 2025, we held approximately 80 one-on-one client meetings, contributed to several external events such as symposia and roundtable discussions, and organised several client and stakeholder events ourselves. The importance of reducing climate impact was raised in almost all cases.

Positive pricing

In 2025, climate mitigation targets were included in four sustainability-linked loans. Through performance agreements, our clients commit to reducing their overall climate impact (scopes 1 and 2). For the first time, we also made agreements on reducing the climate impact related to buildings.

Active financing

We are a highly active financier of the energy transition, which indirectly mitigates climate impact. See also our audacious goal in the **'energy'** material topic.

Exclusion

In 2024, we decided not to offer financing to one client due to its high exposure to fossil fuel companies. No such exclusions were applied in 2025.

Targets

We have set the following absolute reduction targets (in CO_2e) for our emissions and emissions in our value chain. The reduction targets have been set for scopes 1, 2 and 3 on a gross basis, excluding *removals*,

avoided emissions and to-be-purchased *carbon credits*. The reporting boundary for scopes 1 and 2 is the company itself, and for scope 3 it is our liquidity and loan portfolio. This corresponds to the scope 1 gross emissions, scope 2 gross emissions and financed emissions categories shown in Table E1-6.

The targets for housing associations, healthcare institutions and municipalities have been developed using CO_2e reduction pathways based on International Energy Agency scenarios.They have not been agreed with stakeholders. For the water authorities, the targets are aligned with the sectoral targets where possible, which has influenced our targets in this way. We have not discussed the CO_2e reduction targets with the drinking water companies. As no reduction scenarios are available for the other client sectors, we follow a linear reduction path (in these cases. We only provide project financing for renewable electricity generation, such as wind and solar power.

For municipalities, a change in the methodology used to calculate financed emissions has led to an adjustment of the 2018 baseline. Previously, emissions from this client group were estimated higher than was actually the case. This was corrected in 2025, with the comparative figures for 2024 and 2018 also adjusted retrospectively. An overview of the changes and their impact is included in the **Appendix**. In addition to adjusting the base value, we are applying a new IEA transition pathway in line with the SBTi tool update for targets. The combination of the base year adjustment and the transition pathway leads to an increase in the sector target for 2030 (15.7 -> 23.1 tCO_2-e / EUR million, + 47%). This also impacts the absolute target for the portfolio (843 $MtCO_2$-e -> 888 $MtCO_2$-e, + 5.3%).

In addition to the change affecting municipalities, the method used for healthcare institutions has been revised to allow more actual data to be used. Due to limitations in data availability, the base year cannot be recalculated. The target for this sector remains unchanged.

TARGETS

Category	Standard	Baseline	Baseline value	**2025**	2024	Target 2030	Scenario/ transition pathway	Method/ target
Scopes 1 and 2 (market-based)	tCO_2e	2018	133	**20**	30	-65.5%	IEA NZE	SBTi validated
Purchase renewable electricity	% purchased 'green' electricity	2018	100%	**100%**	100%	100%	SBTi pathway	SBTi validated
Scope 3	tCO_2e	2018	1,571,062	**1,419,087**	1,496,231			
Liquidity portfolio (corporate bonds)[1]	% liquidity portfolio SBTi-certified	2023		**46%**		45.6% (2028)	SBTi pathway	SBTi validated
Project financing electricity generation	% sustainable projects	2018	0%	**100%**	100%	100%	SBTi pathway	SBTi validated
Financed emissions total loan portfolio								
Absolute target	tCO_2e	2018	1,570,942	**1,419,003**	1,496,151	888,126		Consolidation of sector targets
Relative financial target	tCO_2e / EUR M	2018	35.3	**23.1**	25.9	16.9		Consolidation of sector targets
Sectoral - relative financial targets (tCO2e / EUR M)								
Housing associations	tCO_2e / EUR M	2018	16.5	**8.6**	10.2	7.8	IEA NZE	SBTi validated
Water authorities	tCO_2e / EUR M	2018	120.4	**50.6**	59.0	82.0	Sectoral	Own
Municipalities	tCO_2e / EUR M	2018	32.2	**36.1**	31.4	23.1	IEA NZE	Based on SBTi
Healthcare institutions	tCO_2e / EUR M	2018	49.1	**20.3**	21.9	17.6	IEA NZE	Based on SBTi
Drinking water companies	tCO_2e / EUR M	2020	44.8	**30.4**	33.7	29.9	Linear	Own
Sectoral - relative physical targets scopes 1 + 2 (tCO2e / m2 real estate)								
Housing associations	tCO_2e / m2	2018	29.9	**21.4**	22.3	10.9	IEA NZE	SBTi validated
Municipalities	tCO_2e / m2	2018	35.4	**20.7**	22.3	12.5	IEA NZE	Based on SBTi
Healthcare institutions	tCO_2e / m2	2018	98.4	**42.0**	44.4	26.2	IEA NZE	Based on SBTi

1) The percentage of corporate bonds issued by parties accredited by the SBTi. The total amount of corporate bonds is €337 million, of which 46% was accredited at year-end 2025. These bonds are part of the interest-bearing securities.

KPI results

The table included below provides an overview of the emissions associated with our operations. We calculate the climate impact of our loan portfolio using the methodology of the Partnership for Carbon Accounting Financials (PCAF, 2022). The base year for the calculations and targets is 2018. This forms the basis for our targets and climate approach. The relevant assumptions and method are explained in the **Appendix**. Further information can be found in the **PCAF Report 2025**, which is available separately. An overview of the changes and their impact is also included in the **Appendix**.

For the 2018 reference year, we use the same definitions and boundaries, with data recalculated if the method changes in later years. In 2025, the methodology for the 'financed emissions' category changed.

In addition to sector-specific emission factors, we use extensive actual energy consumption data and reported emissions from parties in the value chain. Most of the data used for the value chain comes from indirect sources.

Project financing electricity generation

We determine the share of our total outstanding project financing related to electricity generation that is sustainable based on the method of generation. Projects involving wind or solar energy are classified as sustainable. In 2025, 100% of the relevant outstanding financing was related to wind or solar (2024: 100%).

SBTi validation of liquidity portfolio

To determine the proportion of the liquidity portfolio with SBTi-validated emission targets, we assess the proportion of outstanding corporate bonds that have been accredited.

Greenhouse gas emissions

Formally, only financed emissions (scope 3 – value chain) are material. However, for the sake of completeness, we also map other scope 1, 2 and 3 emissions.

Scope 1 emissions cover heating our own buildings and fuel for our vehicles.

Scope 2 includes the purchase of electricity for our own building. We do not deviate from the principle of 'operational control', except for financed emissions, which are allocated to outstanding financing according to the PCAF method. The boundaries of these categories align with those used for our emission targets'.

In 2025, the method for healthcare institutions was revised. The reason was to improve the Data quality for this sector. In collaboration with other parties in the sector, we requested that healthcare institutions share data on their actual energy consumption. We were also able to establish new key figures based on this data. The data score has improved (2.6, 2024: 3.2) and the financed emissions have decreased.

Our organisation's electricity consumption is fully covered by a sustainable contract based on 100% Dutch wind energy, for which we have received

GHG EMISSIONS IN TCO_2E

	2025	2024	% Nt / Nt -1	2018
Total emissions (location-based)	**1,419,174**	**1,496,349**	**-5.2%**	**1,571,195**
Total emissions (market-based)	**1,419,106**	**1,496,261**	**-5.2%**	**1,571,195**
Gross scope 1 emissions	**20**	**30**	**-34.1%**	**133**
Gas consumption	20	30	-34.1%	47
Total number of petrol-powered company cars	-	-	0.0%	86
Total number of diesel-powered company cars	-	-		
Gross scope 2 emissions	**68**	**88**	**-23.0%**	
Location-based	68	88	-23.0%	
Market-based	-	-		
Gross scope 3 emissions	**1,419,087**	**1,496,231**	**-5.2%**	**1,571,062**
Purchased goods / paper usage	2	2		6
Business travel	22	34		114
Employee transport	59			
Financed emissions	1,419,003	1,496,151	-5.2%	1,570,942

certificates. To calculate location-based scope 2 emissions, we use the relevant national-level emission factor from CO_2emissiefactoren.nl.

Due to the relatively limited size of scope 1, scope 2 and scope 3 emissions related to operations, these are not considered material. The only material emissions for NWB Bank are the financed emissions in scope 3. However, to provide a complete picture, we include the other categories, in accordance with the templates off the ESRS.

'Financed emissions' refer to the attributed scope 1, 2 and 3 emissions of our customers. These are presented separately in the tables 'Financed emissions in 2025' and 'Financed emissions in 2024'. Financed emissions are the sum of 'scope 1 and 2' and 'scope 3'.

GHG removal and mitigation

Many significant business processes that we finance in the public domain result in greenhouse gas (GHG) emissions. These financed emissions are offset by financed removals. Under the current methodology, this relates to the water treatment process of drinking water companies, in which the addition of calcium to the water results in the absorption of CO_2 from the atmosphere and its durable (biogenic) sequestration. The resulting removed emissions have been determined in accordance with the PCAF methodology.

We also buy carbon credits. These are used to offset Scope 1 and 2 emissions from our own operations. The credits are certified by Syntraal B.V. and registered with Stichting Nationale Koolstofmarkt (SNK) and relate to (technical) emission-reduction projects in the Dutch public sector. SNK guarantees additionality and independent verification of the certified projects.

Although we offset our own Scope 1 and 2 emissions with carbon credits, we do not claim climate neutrality. We remain committed to further improving the sustainability of our operations. The purchase of carbon credits does not alter the targets or pathways we have set to achieve net-zero climate impact by 2050.

For this standard, we have exclusively used directly reported information from the value chain. There is no reason to assume a high degree of measurement uncertainty.

GHG REMOVAL AND MITIGATION

	2025	2024	% Nt / Nt -1	2018
Total removed GHG in the upstream and downstream value chain (tCO_2e)	**924**	**855**	**8.1%**	**-**
Water purification processes drinking water companies	924	855	8.1%	-
Total GHG mitigation of projects financed through carbon credits (tCO_2e)	**84**	**80**	**5.0%**	**-**
Shares issued for EU projects	84	80	5.0%	-
Share qualifying as 'corresponding adjustment' under A6 of the Paris Agreement				

FINANCED EMISSIONS IN TCO_2E 2025

			Scope 1, 2				Scope 3			
Sector / Klantgroep		Outstanding or gross carrying (€ mn year)	Absolute financed emissions (ton CO_2e)	Economic emission intensity (tCO_2e/Mln €)	Data quality score	Coverage rate (%)	Absolute financed emissions (ton CO_2e)	Economic emission intensity (tCO_2e/Mln €)2	Data quality score 2	Coverage rate (%)
Totaal		**72,868**	**1,032,440**	**16.8**	**2.4**	**94.0%**	**386,562**	**6.3**	**3.1**	**32.4%**
Loans and receivables		**54,968**								
Loans and receivables (less adjustments)		**56,926**	**947,310**	**16.7**	**2.3**	**99.4%**	**339,136**	**6.0**	**3.0**	**34.0%**
Social housing	Social Housing Associations	36,607	314,736	8.6	2.0	99.8%	-	-	-	-
Public sector	Water Authorities	8,563	385,088	45.0	2.9	100%	48,056	5.6	2.0	100%
	Municipalities	4,294	21,820	5.1	3.0	100%	133,232	31.0	4.0	100%
	Provinces	291	345	1.2	4.0	100%	7,480	25.7	4.0	100%
	Others	20	-	-	-	-	-	-	-	-
Healthcare	Healthcare institutions	1,886	26,278	14.0	2.8	99.4%	11,732	6.3	2.1	79.7%
Education	Educational institutions	66	846	12.7	3.0	100%	-	-	-	-
Power generation	Renewable energy	1,178	-	-	-	100%	23,033	20.5	3.0	95.6%
Utilities	Drinking water utilities	1,433	27,387	20.1	2.0	95.2%	14,106	10.3	3.0	95.2%
Other sectors	Others	2,567	170,810	71.2	4.5	93.5%	101,497	42.3	5.0	86.0%
Financial and insurance	Credit institutions	21	-	-	-	-	-	-	-	-
Value adjustments, expected credit loss and accrued interest		*-1,958*								
Interest-bearing securities		**8,114**								
Interest-bearing securities (less adjustments)		**8,450**	**85,130**	**17.6**	**3.0**	**57.8%**	**47,426**	**25.5**	**3.6**	**22.0%**
Financial and insurance	NHG pass-through RMBS	3,288	59,741	19.8	3.0	92%	-	-	-	-
Public sector	Water Authorities	400	17,989	45.0	2.9	100%	2,245	5.6	2.0	100%
	Municipalities	1,456	7,400	5.1	3.0	100%	45,181	31.0	4.0	100%
Utilities	Regional network operators	337								
Other sectors	Others	2,969								
Value adjustments, expected credit loss and accrued interest		*-336*								
Cash, cash equivalents and deposits at the Central Bank		*1,432*								
Receivables under collateral arrangements		*2,726*								
Derivative assets		5,436								
Other assets		193								

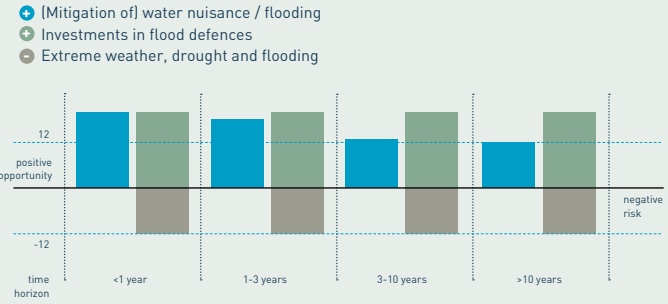
We calculate emissions based on the principal amounts. To ensure consistency with the balance sheet, changes in value, expected credit losses, and accrued interest are shown separately. The 'other assets' item comprises intangible fixed assets, tangible fixed assets, other assets, receivables from credit institutions guaranteed by the Dutch government, and prepayments and accrued income.

FINANCED EMISSIONS IN TCO_2E 2024

			Scope 1, 2				Scope 3			
Asset class, Sector / Sub-sector		Outstanding or gross carrying (€ mn year)	Absolute financed emissions (ton CO_2e)	Economic emission intensity (tCO_2e/Mln €)	Data quality score	Coverage rate (%)	Absolute financed emissions (ton CO_2e)	Economic emission intensity (tCO_2e/Mln €)2	Data quality score 2	Coverage rate (%)
Totaal		**78,769**	**1,141,640**	**19.3**	**2.4**	**96.9%**	**354,511**	**6.0**	**3.0**	**35.0%**
Loans and receivables		**59,158**								
Loans and receivables (less adjustments)		**55,127**	**1,058,251**	**19.4**	**2.3**	**99.1%**	**317,542**	**5.7**	**2.9**	**35.5%**
Social housing	Social Housing Associations	34,522	352,202	10.2	2.0	100%	-	-	-	-
Public sector	Water Authorities	8,545	447,408	52.4	2.9	100%	57,102	6.6	2.0	100%
	Municipalities	4,408	26,859	6.1	3.0	100%	111,487	25.3	4.0	100%
	Provinces	317	442	1.4	4.0	100%	9,616	30.4	4.0	100%
	Others	20	-	-	-	-	-	-	-	-
Healthcare	Healthcare institutions	1,985	32,327	16.4	2.7	99.4%	10,885	5.5	2.1	80.9%
Education	Educational institutions	70	1,056	15.1	3.0	100%	-	-	-	-
Power generation	Renewable energy	1,045	-	-	-	100%	17,357	18.7	3.0	86.5%
Utilities	Drinking water utilities	1,445	32,747	22.9	2.0	98.9%	15,477	10.8	3.0	98.9%
Other sectors	Others	2,577	165,212	69.8	4.5	91.9%	95,618	40.4	4.8	91.1%
Financial and insurance	Credit institutions	194	-	-	-	-	-	-	-	-
Value adjustments, expected credit loss and accrued interest		*4,031*								
Interest-bearing securities		**5,584**								
Interest-bearing securities (less adjustments)		**5,733**	**83,389**	**19.0**	**3.0**	**76.6%**	**36,970**	**21.0**	**3.5**	**30.6%**
Financial and insurance	NHG pass-through RMBS	2,864	54,182	20.6	3.0	92%	-	-	-	-
Public sector	Water Authorities	400	20,944	52.4	2.9	100%	2,673	6.6	2.0	100%
	Municipalities	1,356	8,262	6.1	3.0	100%	34,297	25.3	4.0	100%
Utilities	Regional network operators	-	-	-	-	-	-	-	-	-
Other sectors	Others	1,113	-	-	-	-	-	-	-	-
Value adjustments, expected credit loss and accrued interest		*-149*								
Cash, cash equivalents and deposits at the Central Bank		6,623								
Receivables under collateral arrangements		*2,514*								
Derivative assets		4,740								
Other assets		150								

Compared with the extrapolation published last year, the actual emissions for 2024 differ. This is due to differences in methodology. To ensure consistency with the balance sheet, changes in value, expected credit losses, and accrued interest are shown separately. The 'other assets' item comprises intangible fixed assets, tangible fixed assets, other assets, receivables from credit institutions guaranteed by the Dutch government, and prepayments and accrued income.

Climate adaptation ESRS E1



Impact materiality
positive
negative

Financial materiality
opportunity
risk

time
>12: material

	Achieved		Target	
KPIs	2024	**2025**		
Mitigation of flooding (I+)				
Share of primary and regional flood defences (km) assessed/compliant	69.7%	**67.9%**	**2050**	100%
Share of protected area that does not meet flooding standards	0.36%	**0.31%**		
Adaptation risks (R)				
Investments in flood defences (O)				



Climate adaptation is a material topic for us due to our financing of water authorities.

We have a positive impact on the reduction of flooding – a potentially significant source of damage – in the Netherlands by financing water safety measures implemented by water authorities. Water authorities invest approximately €1.7 billion annually in water safety. We aim to finance around 90% of the water authorities' external funding.

At the same time, NWB Bank is exposed to risks arising from clients' exposure to climate adaptation risks, such as flooding, drought and extreme weather, which may translate into credit risk. Clients' exposure varies depending on the physical location of their activities. Extreme weather events can disrupt operations and, when they affect an organisation's financial position, create potential credit risk for the bank.

Impact case – Brabantse Delta Water Authority Between now and 2050, the Brabantse Delta Water Authority will reinforce five sections of the dike. These projects are enormous in scale and grounded in an integrated vision. In addition to safety, issues such as housing development, the energy transition, shipping and nature must also be taken into account. In this context, the open lines of communication with NWB Bank are extremely valuable.

We also see opportunities for the organisation linked to both impact and risk, as the financing needs of water authorities increase due to required investments in flood defences. We have a significant share in meeting the financing needs of water authorities. As these parties will have to invest heavily in improving and maintaining flood defence safety measures in future, we anticipate realising financial opportunities. The water authorities invest around €1.2 billion every year as part of flood defence safety measures. As previously mentioned, we are a key partner in this endeavour.

Our KPIs provide insight into the improvements in Dutch water safety we help enable, as well as the risks in areas that do not yet meet the required safety standards.

Policy, action and target

Here we elaborate on our policies, actions and targets for climate adaptation

Policy

We aim to reduce our emissions as much as possible and contribute to the fight against global warming. At the same time, both we and our clients must prepare for and adapt to a changing climate. The process by which societies reduce their vulnerability to climate change or take advantage of the opportunities a changing climate offers is called climate adaptation. As a major financier of water authorities, we play a leading role in financing solutions to flood risks and other water management challenges brought on by climate change. As a bank dedicated to the public water sector, climate adaptation is at the heart of our mission. NWB Bank was founded in 1954 following the devastating North Sea floods of 1953 to finance critical water management investments. For 70 years, financing (climate) adaptation has been our core business.

Climate-resilient water system

For the Netherlands, global climate change means higher temperatures, a greater chance of longer periods of drought or, conversely, longer periods with more rainfall, rising sea levels, higher water levels in rivers and other waterways, but also more periods of lower (ground) water levels. After the dry years of 2018, 2019, 2020 and 2022, 2023 and 2024 were extremely wet. In 2025, a record of approximately 670 millimetres of rain fell. That is below the long-term average. Such extreme weather conditions are expected to become more frequent. Measures must be taken to adapt the water system to the impacts of climate change. Only then can we ensure people's safety and do our best to prevent damage. The water authorities play an important role in making the flood defences and water systems they manage climate resilient.

Our climate adaptation policy, part of the ESG transition plan, provides for the lowest possible financing costs for our clients, appropriate financing, continuous availability of financing and the highest possible market share (i.e. >90%) in financing water authorities, thus contributing to the goal of 100% adequate flood protection by 2050. Our loans to water authorities allow them to do what they do best.

Action

Regarding climate adaptation, we focus on engagement and active financing. In this way, we contribute to risk mitigation and increase positive impact. By actively financing, we also realise financial opportunities.

Engagement

We engage broadly on climate adaptation. The financial sector is paying increasing attention to climate adaptation, and in 2022, a special working group was established as part of the Dutch Central Bank's Sustainable Finance Platform, of which we are a member. Together with other banks, insurers, investors and governments, we explore how the financial sector can help build a climate-resilient Netherlands. At the end of 2023, the working group submitted the report 'Klimaatadaptatie in een stroomversnelling' (Climate adaptation on the fast track) to the Minister of Infrastructure and Water Management. The report calls for clarity on how to build adaptively to the climate and where we should and should not build. We also believe that the government should indicate where there is space for agriculture and other economic functions in the Netherlands.

Over the past two years, we have been involved at the European level in the Reflection Group on Financing Climate Resilience, both in our capacity as a bank and through our role as chair of the European Association of Public Banks. On 2 December 2025, the group presented its report, including key findings and recommendations, to European Commissioner Hoekstra.

In addition, we are working with five other organisations – the housing association Ymere, the drinking water company PWN, the Municipality of Haarlem, the Province of North Holland and the Rijnland Water Authority – to develop a new residential area that is both water-robust and climate-resilient. Together, we are explore how to fully commit to water conservation, reuse and smart water management without compromising construction timelines, while seeking synergies between these

objectives. These considerations are being embedded in the design, layout and living environment of the area. Through this pilot project, we aim to bring clients together to address societal challenges in a proactive and integrated way, making full use of our role as a financier of the public sector.

Positive pricing

In 2025, two sustainability-linked loans included climate adaptation targets (2024: 0). Through these agreements, our clients are committed to developing or renovating real estate in a climate-adaptive manner.

Active financing

We aim for the largest possible market share in financing water authorities. By doing so, we actively finance climate adaptation, benefiting not only our other client groups but also helping to partially mitigate climate risks in our lending portfolio.

Action

We apply the following climate adaptation actions.

KPIs	2025	2024
Percentage primary and regional flood defences (km) reviewed/compliant	67.9%	73.9%
Number of hectares that do not meet flooding standards	0.31%	0.36%

Percentage primary and regional flood defences reviewed/compliant

Good water management includes building and maintaining infrastructure to reduce the risk of flooding from rising sea levels and extreme rainfall. Primary flood defences are an important part of this. In 2017, a new safety standard for flood risk was introduced. This safety standard states that every Dutch citizen has a 1 in 100,000 chance of drowning in a flood each year. All flood defences must meet this standard by 2050, and in 2024, 67.9% (8,148 km) already met the standard. We are a major financier of water authorities and therefore of flood defences.

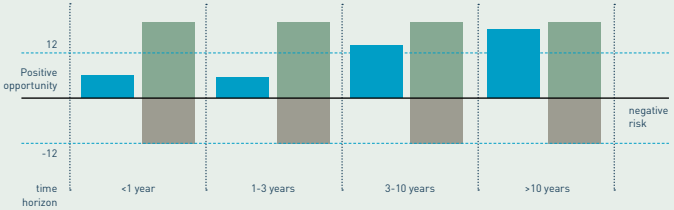
Number of hectares not meeting flood standards

If water is not drained sufficiently or quickly enough, flooding can occur, leading to significant damage. The vulnerability of an area to flooding is measured by the number of hectares that do not yet meet the standards set in the national water agreement. Water authorities are responsible for ensuring adequate drainage across large areas.

Indicators for flood protection and flooding are derived from the water authorities' Climate Monitor. These indicators are based on data measured by the water authorities and are highly accurate.

Energy ESRS E1

- Financed renewable energy production
- Energy transition
- High energy consumption, fossil energy consumption



Impact materiality
positive
negative

Financial materiality
opportunity
risk

time
>12: material

	Achieved		Target	
KPIs	2024	**2025**		
Financed sustainable production (I+), energy transition (0), high consumption (R)				
Share of loan portfolio that is energy positive	78.2%	**105.8%**	**2035**	100%



Energy is a material topic for us because our financing affects both sides of the (energy(scale. On the one hand, we provide loans to energy consumers; on the other, we are an increasingly important financier of sustainable energy projects in the Netherlands.

We promote sustainable energy production by financing sustainable energy projects. Over the years, we have expanded our portfolio to include a growing number of solar and wind farms, as well as heat networks. By providing long-term financing, we strengthen the security and investability of the sector, thereby contributing positively to the availability of sustainable energy.

At the same time, the bank is exposed to potential credit risk arising from clients' exposure to the energy transition. These risks are linked to high energy consumption, reliance on fossil fuels and grid congestion, which further complicates the transition.

Impact case – Geothermie Delft Geothermal energy has proven itself as an effective heat source, particularly in greenhouse horticulture, where the demand for heat is extremely high. This technology could play a significant part in the deployment of new heat networks. Geothermie Delft also helps us to achieve our goal of having an energy-positive credit portfolio by 2035.

The need to adapt operations and make related investments can put pressure on clients' financial positions and, in turn, create credit risk for the bank. However, as our financing is often backed by government guarantees, this risk is largely mitigated.

We also see opportunities arising from the growing financing needs of clients as they invest in renewable energy production and upgrades to the electricity grid. Within the (semi-)public sector, investment in renewable generation is increasing, alongside the need to better align energy consumption with supply. The electricity grid must be adapted to manage peaks in production and demand. Besides heat networks, solar and wind projects, NWB Bank finances grid operators. Rising demand therefore expands the market for our financing activities, and as a significant player in this sector, we expect to realise opportunities.

Our objective of achieving an energy-positive portfolio – the KPI underpinning our audacious goal – provides insight into our exposure to transition risks related to energy consumption, as well as into the opportunities realised and the positive impact of the renewable energy production we finance.

Policy, action and target

Here we elaborate on our policies, actions and targets relating to the energy topic.

Policy

We aim to make our loan portfolio energy positive by 2035, on the way to becoming climate neutral by 2050. This is what we term our 'audacious goal.' Energy positive means that the sustainable energy projects we finance generate more energy from renewables than our clients use from fossil sources. We compare fossil heat with sustainable heat and fossil electricity with renewable electricity. On the one hand, we want to encourage our clients to reduce their energy consumption and use renewable energy wherever possible. On the other, we want to provide more funding for renewable energy projects so that as much renewable energy as possible becomes available.

Where relevant, we apply the Equator Principles to the financing of renewable energy projects. These principles were developed by financial institutions and provide a risk management framework for identifying, assessing and managing social and environmental risks in financing projects. Recurring themes include the complex supply chains of sustainable energy and the impact on human rights in the extraction of raw materials for such projects.

Our own energy consumption is not significant, given our compact organisation. We have not identified any material impacts, risks or opportunities.

Action

For energy, we focus on active financing and positive pricing. In doing so, we contribute to mitigating risks and increasing positive impact. Through active financing, we also realise financial opportunities.

Positive pricing

In 2025, 13 sustainability-linked loans included energy-related targets (2024: 7), making energy the most frequently used theme in performance agreements. Through these agreements, clients primarily commit to reducing their reliance on fossil fuels.

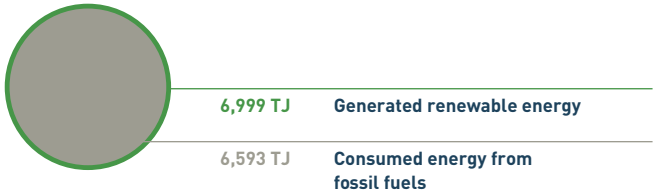
Actions and targets

We apply the following actions and targets to energy.

Audacious goal

With regard to our audacious goal of achieving an energy-positive loan portfolio by 2035, we define 'energy-positive' as the production of renewable (climate-neutral) energy from our financed clients and projects being greater than the fossil energy consumption of our other clients and projects from 2035 onwards. Compared to last year, we can show great progress towards this 'audacious goal'; 106.2% (2024: 78.2%) was energy positive by the end of 2025. The KPI energy-positive means that the fossil use of the portfolio is offset against the generation of sustainable energy from our portfolio, mainly from the financing of wind and solar parks. For the calculation of the energy consumed from fossil fuels, the climate footprint data, calculated by Het PON & Telos, is used, as described in the section **Progress audacious goal**. Despite the nice increase, we still face a major challenge to keep our loan portfolio energy positive in 2035, above 100%. For the audacious goal, energy production was either based on reported historical client data or calculated from the theoretical energy of the project in question.

AUDACIOUS GOAL: ENERGY POSITIVE BY 2035



Our own energy consumption

Our own energy consumption (electricity) is sustainable. Below is an overview of the emissions (equivalents) for 2025. The electricity consumed during this period came from renewable sources with no direct carbon emissions. Gas was supplied by the utility company, including CO_2 offsetting. As stated, our own energy consumption is not material. We report this metric for comparability purposes.

ENERGY CONSUMPTION

	2025	2024	% Nt / Nt -1
Total energy consumption (MWh)	**425.0**	**503.8**	**-15.6%**
Of which fossil fuels	117.2	176.5	-33.6%
Of which renewable energy	-	-	-
Of which consumption of renewable energy	307.8	327.3	-6.0%

The information about our energy consumption comes directly from the energy supplier. There is no reason to assume a high degree of measurement uncertainty.

EU TAXONOMY

The Green Asset Ratio (GAR) is a key performance indicator (KPI) under the Taxonomy Regulation and provides insight into the extent to which banks contribute to the green transition and to the European Union's climate objectives. We report the GAR using the older EU reporting templates that remain applicable. These templates are included in the Appendix. The GAR is to a significant extent determined by the structure and requirements of these prescribed templates. The European Commission is currently working, under the Omnibus package, to simplify the reporting templates and, among other things, to revise the technical screening criteria and DNSH criteria within the taxonomy. These developments may affect future reporting requirements, including the outcome of the GAR.

Explanation

The majority of our loan portfolio does not fall within the scope of the Non-Financial Reporting Directive (NFRD). As a result, these exposures are excluded from the numerator under the EU Taxonomy, but are included in the denominator of the ratio. This is inherent to our business model, in which many clients are not subject to statutory sustainability reporting requirements. In addition, some of our clients do not yet have Taxonomy information available. Due to the absence of reported data, these exposures cannot be classified as eligible or aligned. As a result, our GAR is currently very low.

At the same time, a number of clients, including drinking water companies, regional grid operators and a wind farm, are fully eligible under the EU Taxonomy. For one client (a wind farm), we have also determined that it aligns with the Do No Significant Harm (DNSH) criterion and the Technical Screening Criteria. Finally, exposure to credit institutions has been included, as several institutions to which we are exposed already report under the EU Taxonomy. Based on their published reports, we have incorporated their eligibility and, where available, their alignment in our reporting. The tables for the Green Asset Ratio are included in the **Appendix**.

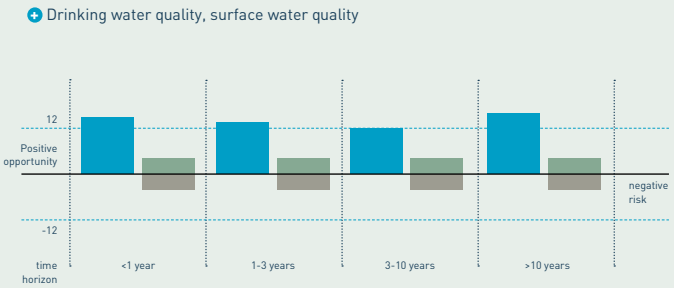
In 2026, new simplified templates were approved. In this report, we apply the old templates (in accordance with EU 2023/2486). Templates 4, 6 and 7 relating to off-balance-sheet KPIs, trading and commission income are not applicable to us. For 2024, the CapEx KPIs have not been calculated; this column has therefore been left blank in the overview below.

For the Taxonomy requirements relating to the financing of activities in nuclear and fossil gas-based energy generation, only clients that are eligible under the Taxonomy have been included. The relevant table is included in the **Appendix**.

Template 0: Overview of KPIs

	2025						2024					
	Total environmentally sustainable activities	KPI turnover	KPI capex	% coverage (over total assets)	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2 of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)	Total environmentally sustainable activities	KPI turnover	KPI capex	% coverage (over total assets)	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2 of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
Main KPIs												
Green asset ratio (GAR) stock	220,061,428	0.41%	0.17%	74.2%	62.8%	25.8%	158,909,912	0.22%	-	91.6%		
Additional KPIs												
GAR (flow)	44,635,949	0.47%	0.00%	85.2%	80.8%	14.8%	-	0.00%	-	100.0%		
Trading book	-	-	-	-	-	-	-	-	-	-		
Financial guarantees	-	-	-	-	-	-	-	-	-	-		
Assets under management	-	-	-	-	-	-	-	-	-	-		
Fees and commissions income	-	-	-	-	-	-	-	-	-	-		

Water management ESRS 2



	Achieved		Target	
KPIs	2024	**2025**		
Drinking water quality (I+)				
Drinking water quality	99.9%	**99.8%**		
Surface water quality (I+)				
Surface water quality – biological	12.8%	**12.8%**		
Surface water quality – chemical	0.7%	**4.9%**		
Surface water quality – overall	0.0%	**0.0%**		



Water management is a material topic arising from our loans to water authorities and drinking water companies. The Dutch water sector faces significant challenges that require investment, in which our lending plays an important role.

The first positive impact that our organisation has had on improving the quality of surface water stems from financing water authorities. By financing water authorities, we contribute to operations and innovations that improve surface water quality. Water authorities purify wastewater, thereby improving the quality of surface water. Water authorities are also working to achieve the objectives of the Water Framework Directive (WFD). Around 14% of water authorities' total investment agenda is devoted to improving water quality. Our goal is to secure at least 90% market share in financing water authorities.

Impact case – Dunea In 2025, Dunea, a drinking water company, became the first to receive a sustainability-linked loan. At Dunea, sustainability is an intrinsic motivation. Many employees have a strong connection to nature, and the organisation's DNA is rooted in the combination of nature and water. The core business is, of course, supplying drinking water, but in the most nature-inclusive way possible.

We also improve the quality of drinking water by financing drinking water companies. These companies ensure the supply of reliable, high-quality drinking water by purifying groundwater and surface water. We aim for a market share of at least 33% in the financing of drinking water companies. The extent of our lending to the water sector is detailed in the **annual results** discussion.

By broadly capturing water quality in KPIs, we highlight areas where Dutch water quality is lacking. This is where our financing can make a difference.

Policy, action and target

Here we elaborate on our policies, actions and targets for water management.

Policy

Water authorities and drinking water companies play a key role in providing clean water and sanitation.

The quality of surface water in the Netherlands leaves much to be desired. None of our rivers, ditches, lakes, canals and streams meet the requirements of the WFD, which stipulates that all our surface waters must be healthy by 2027. To meet the WFD objective, a water body must be 'in the green' for every parameter, i.e. it must fall into the 'good' category. If this is not the case for one or more parameters, the water body is not in good condition (one out, all out). The ecological quality is such that the surface water body does not meet the requirements of the WFD. However, the water quality in 2025 did show improvement in terms of chemical composition.

Th Netherlands also faces major challenges with its drinking water. Population growth and climate change are some of the factors that will increase demand for drinking water in the coming years, while the availability and quality of sources will decline. The decrease in drinking water sources is due to drought and salinisation caused by climate change, and the decrease in quality is due to increasing levels of pharmaceutical residues, PFAS and other chemicals in drinking water.

Sustainable water management has our full attention. Our policy is to enable water authorities and drinking water companies to invest in sufficient water of good quality by providing competitive financing, although we do not have a formal policy document. In addition to our regular financing activities, we have established the Water Innovation Fund (WIF) to provide risk-bearing capital to innovative projects. Such financing does not align with NWB Bank's risk appetite, which is why we established an independent fund in consultation with our shareholders. In the future, we will continue to seek new financing opportunities to help make the Netherlands more sustainable.

By keeping the financing costs for water authorities as low as possible, with a target market share of at least 90%, we facilitate the transition to improved water quality. In addition, the water authorities share in NWB Bank's profits when dividends are paid out. Approximately 16% of our lending is for water quality, in line with the water authorities' financing agenda. By keeping the cost of finance low for drinking water companies and providing appropriate financing, we help to ensure that drinking water is of high quality and available in sufficient quantities. We aim for a market share of at least 33%. The CCLO is responsible for implementing the policy.

Actions

We will briefly discuss our actions for drinking water and surface water here, in the context of the **'Our influence'** framework discussed earlier. Our current actions combine active funding and engagement with drinking water companies and water authorities. These actions and action plans for water quality and availability are more general than specific. Therefore, we have not attached specific time frames to the actions we are implementing. We will evaluate the impact of these actions over the next few years.

Active financing

We are actively seeking to expand financing options at attractive rates. We expect this to further improve the quality and availability of drinking water. To secure the supply of drinking water for the future, the companies expect a sharp increase in the investments required for the infrastructure and nature management in the coming years. They will finance these investments with income from the supply of drinking water, but will also seek external funding, including from NWB Bank.

Water Innovation Fund

In 2020, we launched the NWB WIF, through which we support innovative projects by water authorities that are broadly applicable and contribute to the sustainability of the Netherlands. The WIF is a revolving fund that operates at arm's length from NWB Bank, with its own board and investment committee. The WIF provides risk-bearing capital in the form of a loan. It always concerns co-financing: the fund contributes up to 50% of the total required risk-bearing capital, and at least one third of

that capital must be provided by one or more water authorities. The maximum financing contribution from the fund amounts to €2 million per application.

Engagement

We will engage with both the water authorities and the drinking water companies, as well as relevant stakeholders in their immediate environment, to improve the quality and availability of drinking water and surface water. The scope and approach are different for the two sectors.

Surface water, particularly its poor quality, is an important issue for water authorities. In our discussions with water authorities, we emphasise the need to proactively improve water quality as we are currently not meeting the requirements of the WFD. Several sub-targets for chemical and ecological water quality are being met, but they are fragmented across locations, leaving the overall objective out of reach. The reasons why the WFD objectives are not being met are many and complex. For example, efforts to restore ecosystems can be undermined by invasive species such as the American crayfish.

We consider the security of **drinking water supplies** in our client assessments. Based on these assessments, the credit terms for these clients are determined, and we engage in discussions with them. In this context, we use the map developed by the National Association of Water Companies (Vewin) to safeguard the drinking water supply. To improve the financing capacity of drinking water companies, the Ministry of Infrastructure and Water Management increased the regulated maximum weighted average cost of capital (WACC) for the period 2025–2027.

Action and targets

Next year, we will work with the water authorities to investigate alternative targets. For now, we are measuring progress using the following criteria, with 2023 as the base year.

We have not yet set a target for drinking and surface water in our ESG transition plan, nor have we established a concrete timeline for doing so. For now, we are measuring progress using the following criteria, with 2023 as the base year. The current quality is adequate, and we are not aiming for immediate improvement.

In the **Appendix**, we describe the data quality and source data for the reported criteria. Additional information is included in the separately published **ESG Impact report**.

Targets for drinking water and surface water

KPIs	2025	2024
Quality of drinking water	99.8%	99.9%
Biological quality of surface water	12.8%	12.8%
Chemical quality of surface water	4.9%	0.7%
Overall quality of surface water	0.0%	0.0%

Quality of drinking water

The target for drinking water quality assesses the quality of drinking water at the national level and therefore applies to all financed drinking water companies. Drinking water in the Netherlands meets the standards of the Human Environment and Transport Inspectorate (ILT) in 99.9% of cases (2024: 99.9%). In 2025, only 1,081 of the more than 682,000 measurements were classified as insufficient.

For drinking water quality, we use information that comes directly from the drinking water companies. This information has been allocated using a proxy, which introduces a high level of uncertainty into the measurement.

Biological, chemical and overall quality of surface water

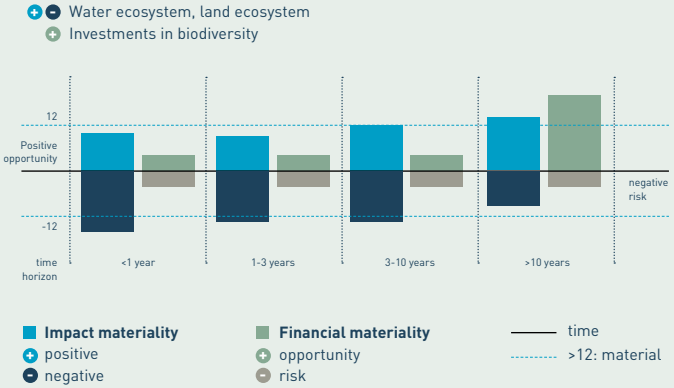
Surface water quality is assessed in both ecological and non-ecological (biological and chemical) terms, based on the proportion of water that meets the WFD standards. The water authorities play a key role in ensuring clean water. In the context of the 'surface water quality' theme, we examine overall quality and, in particular, non-ecological factors. The WFD is concerned with the levels of pollutants in water, the presence of favourable conditions for diverse plant and animal life, and the quantity of groundwater suitable for drinking. The overall quality is a combination of both. If one of the indicators is unsatisfactory, the overall quality is unsatisfactory. New

chemical substances are added to the water test each year, so the results are not directly comparable.

The chemical quality of surface water increased from 0.7% to 4.9%. This increase is mainly attributable to two water authorities.

For the degree of compliance with WFD targets and surface water quality, we use information provided directly by the water authorities. This is not a source of high measurement uncertainty.

Biodiversity & ecosystems ESRS 2



	Achieved		Target	
KPIs	2024	**2025**		
Water ecosystem (I+)				
Ecological surface water quality	0.20%	**0.15%**		
Land ecosystem (I–, I+)				
Managed nature areas	33.3%	**33.4%**		
Green-blue corridors	5.6%	**4%**	**2030**	5%
Investments in biodiversity (O)				



Biodiversity and ecosystems are a material topic linked to our loans to drinking water companies and local authorities that play a role in nature management in rural areas. The state of biodiversity and many ecosystems in the Netherlands is not yet satisfactory.

We identify a negative impact on land-based ecosystems due to the limited biodiversity in the areas managed by our customers. As a public bank, we finance customers that manage large areas of land (including natural areas). At present, the quality of ecosystems in such areas is often poor. Through our financing, we share responsibility for this.

Arising from this impact, we recognise opportunities. Growing awareness of biodiversity loss is increasing clients' financing needs for investments to safeguard biodiversity, particularly among water authorities, drinking water companies and municipalities.

Client case – ViA15 The ViA15 project is expected to last several years, with the new infrastructure due to be fully completed by the end of 2031. The design principles offer benefits for motorists, cyclists and nature. For instance, nesting sites are being created for swallows and other birds, and trees and shrubs are being replanted in various locations.

We have a positive impact on the quality of surface water ecosystems and land-based ecosystems. For instance, we fund long-term measures implemented by water authorities to comply with the WFD. As the main financier of water authorities, we help improve water quality. We also finance clients that are expanding and enhancing land-based ecosystems within the protected nature reserves they manage. Our financing enables them to manage, expand and connect these reserves through green-blue networks. By 'green-blue networks', we mean the green strips and small waterways in rural areas that allow animals to move safely between habitats.

By capturing the state of biodiversity and the areas managed by our clients in KPIs, we demonstrate where Dutch nature is under pressure and where our financing can make a difference. The extent of this is detailed in the chapter **The sustainable water bank: results in 2025** of this Annual Report. The CCLO is responsible for lending.

Policy, action and target

Here we elaborate on our policies, actions and targets relating to the theme of biodiversity and ecosystems (entity-specific).

Policy

For us, sustainability is about more than just the climate. Part of our sustainability policy is therefore our biodiversity policy. This is further elaborated in the ESG transition plan, in which preventing biodiversity loss and promoting biodiversity restoration are key priorities. The decline of nature occurs rapidly, with species facing extinction at an accelerating rate, carrying severe consequences. Biodiversity covers all species of plants, animals and micro-organisms, but also the enormous genetic variation within those species and the variation in the ecosystems of which they are part. If we do not act quickly, up to a million species could disappear. Many sectors of our economy depend on the diversity of the world's plants, animals and insects. It is therefore vital for future generations that we invest heavily in conserving and restoring biodiversity.

In 2023, together with the engineering firm Arcadis, we conducted a study to identify appropriate targets and data sources for monitoring the impact of our loan portfolio on nature. One of the key goals that emerged is to halt the loss of nature and biodiversity in areas managed by our clients by 2030 and work towards restoration. By 2050, we aim for our lending portfolio to be in balance with nature, in line with the Kunming-Montreal Protocol target, though the exact definition of 'in balance with nature' still needs to be refined. We are closely monitoring international developments. The protocol's current targets are to stop biodiversity loss by 2030 and restore ecosystems worldwide by 2050.

We view the impact of our clients as indirectly affected by our organisation. We seek to mitigate or increase this impact by engaging with and motivating clients. Through engagement with relevant clients and industry stakeholders, we raise awareness of biodiversity issues and encourage clients to develop concrete policy documents that address biodiversity in the areas they manage or the impacts of their activities. Responsibility for our biodiversity policy ultimately lies with our Managing Board.

In addition to the ecosystem aspect, we also consider the diversity of animals and plants in the managed area to be very important. Together with Het PON & Telos, we are looking at ways to quantify and monitor biodiversity in the nature reserves on which our value chain is focused. We expect to report a benchmark for this next year.

In 2025, we delivered a bank-wide training programme on biodiversity.

Drinking water companies and local authorities

Drinking water companies benefit greatly from the conservation and restoration of biodiversity. Several of these companies manage nature reserves themselves because they depend on natural ecosystems that need to be protected for water abstraction. We believe it is important that drinking water companies have a nature and biodiversity policy in place by 2030, including measures such as a green-blue network.

By keeping financing costs low for drinking water companies and local authorities (market share >30%; condition included in SLL with local authorities), we facilitate the transition of the green-blue network. Linking nature areas is important for the conservation and restoration of biodiversity, as it increases the habitable area for plants and animals.

Surface water

The quality of surface water is poor. None of the surface waters meet the WFD standards, which require them to be clean and healthy by 2027. The WFD covers all aspects of water: chemistry (pollutants in the water), ecology (good conditions for diverse plant and animal life) and, for groundwater, quantity and suitability for drinking water. Water authorities receive the lowest possible financing costs from all our client groups. NWB Bank's market share among water authorities is over 90%. By providing loans to the water authorities, we facilitate the transition to improved water quality. In addition, the

water authorities share in our profits when dividends are paid out.

Action

With regard to biodiversity, we focus particularly on discussing sound biodiversity policies with clients and supporting and activating industry initiatives. In line with our objectives, we commit to timelines, for example, for the adoption of biodiversity action plans by our clients (see also the section on 'targets and actions'). Broader initiatives, such as our activities in the financial sector, are general in nature and not tied to specific timelines. We aim to encourage our clients through these general actions. Our dialogue with them is mainly in the context of engagement. We will evaluate the impact of these actions in the coming years.

Sector engagement

As part of our commitment to a sustainable future, in 2020, we signed the Finance for Biodiversity Pledge, an initiative by financial institutions to support biodiversity and combat the loss of nature. We have joined over 190 other financial institutions in making this commitment. Specifically, we pledge to measure our impact on biodiversity, draft targets and then report publicly. In addition, we are involved in Agenda Natuurinclusief, an initiative launched by the Ministry of Agriculture, Nature and Food Quality (now the Ministry of Agriculture, Fisheries, Food Security and Nature) aimed at achieving a nature-inclusive society in the Netherlands by 2050.

To address biodiversity more broadly in the financial sector, we were asked in 2018 to set up a biodiversity working group as part of the Dutch Central Bank's Sustainable Finance Platform. We sponsor this working group, which consists of representatives from insurers, asset managers, pension administrators and other banks. The working group is sponsored by the Chair of our Managing Board and chaired by our sustainability officer. We also chair the Nature Working Group of the Dutch Banking Association, where we collaborate with other banks to identify financial risks related to water quality. Finally, we lead the financial sector of the Nature-Inclusive Agenda, an initiative of the Ministry of Agriculture, Fisheries, Food Security, and Nature that focuses on a nature-inclusive Netherlands.

Client engagement

As part of our ESG transition plan, we are holding discussions with our clients, including on biodiversity. As part of these discussions, we are aiming for relevant clients to have a nature and biodiversity policy in place by 2030. Between 2025 and 2028, we will progressively analyse their biodiversity and nature targets to determine whether they align with the Kunming-Montreal Agreement. In 2025, we analysed the plans of the drinking water companies and water authorities. We held discussions with the water authorities' biodiversity experts to improve our understanding of the green-blue network at the water authorities. As a result, the water authorities will report this data point in the coming year, enabling us to manage it more effectively. This is a good example of how our engagement and work with clients lead to concrete results.

Through our sponsorship of Future Dikes, we also support the development of an opportunity scan for herb-rich grassland on dikes, which could improve ecosystems.

Positive pricing

In 2025, biodiversity and ecosystem-related targets were included in four sustainability-linked loans (2024: 0). Through these agreements, our clients commit to developing or renovating infrastructure or real estate in a nature-inclusive manner, or to targeted action to address biodiversity bottlenecks, for example. This contributes to improving ecosystems, reducing negative impacts, and represents a way of realising opportunities.

Targets and standards

Our target for the green-blue networks is 5% in the areas managed by our clients in 2030 and 10% in 2050. We apply this target to municipalities. The percentages are derived from the 'Landscape action plan' target of the Delta Plan for Biodiversity, with the status exceeding the first target. As it concerns a new indicator, the base value is set at 2023 (5.6%). We note here that this improvement is under pressure, partly due to the discontinuation of the National Rural Area Programme. Exceeding the first target is therefore no guarantee of future success. The 2050 target is also a long way off. This target has not yet been

agreed upon with stakeholders. Improving the green-blue network provides a solid foundation for maintaining and enhancing biodiversity in the Netherlands. In doing so, the target contributes to balancing the loan portfolio with nature (policy).

We have not yet formulated concrete targets for the WFD objective (ecological) and managed nature reserves. We are currently reviewing the effectiveness of our measures based on the results of the KPIs.

In the **Appendix**, we describe the data quality and source data. Additional information is included in the separately published **ESG Impact Report**.

WFD standard (ecological)

As described in our water topic, the WFD standard relates to the quality of surface water managed by water authorities across several sub-categories. For the 'biodiversity and ecosystems' topic, we look specifically at the extent to which ecological requirements are being met. This is about ensuring good conditions for diverse plant and animal life. The sectoral target is for all waters to comply by 2027, although this currently appears unlikely to be feasible.

Managed nature reserves

We report the proportion of managed nature reserves that have protected status. To determine the size of the managed protected areas, we use indirect information from publicly available maps. As these are high-quality maps and the size of the managed nature reserves varies little from year to year, this is not a source of high measurement uncertainty.

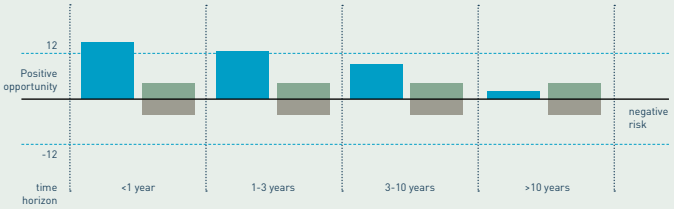
Green-blue network

To determine the green-blue network, we use indirect information on the value chain. The cartographic material for the calculations has been improved, but it lags behind the actual situation. This is a source of uncertainty. We expect to have better material at our disposal by 2026, which will further limit the uncertainty. Because a different methodology was used, the results for 2025 are not readily comparable with those for 2024. It was not possible to recalculate the 2024 results based on the improved mapping data.

SOCIAL INFORMATION

Social housing ESRS 2

Housing construction, housing quality



Impact materiality
positive
negative

Financial materiality
opportunity
risk

time
>12: material

	Achieved		Target	
KPIs	2024	**2025**		
Housing construction (I+)				
Increase in social rental homes	5,832	**7.890**	**2035**	180,000
Housing quality (I+)				
Housing associations' expenditure on maintenance, liveability and energy	€ 7.9 mld	**€ 9.7 mld**		
Allocation of social rental homes	67.0%	**65.7%**		
EFG energy labels	7.0%	**6.0%**	**2028**	3.0%



Social housing is a material topic arising from our lending to housing associations. In terms of size, this is the largest client group in the loan portfolio. We create impact and manage risk by providing affordable and appropriate financing, enabling housing associations to invest in both the quantity and quality of social housing. The scope of this investment is described in the **Report of the Managing Board**.

Our objective is to maintain a market share of at least 33% in lending to housing associations. The CCLO is responsible for lending.

Our financing contributes positively to the condition of the housing stock. Due to the shortage of social housing, many people in the Netherlands face long waiting times for suitable accommodation. We help address this shortage by financing housing associations and their construction projects.

Impact case – WSW NWB Bank and WSW work closely together at all levels and across different areas, both governance- and operationally. Our shared goal is to provide financing at the lowest possible cost to accelerate housing construction in the Netherlands.

By financing housing associations, we support their ambition to build as many suitable homes as possible. Housing associations invest 52% of their funds in new homes each year.

In addition to increasing supply, our financing supports improvements in housing quality. High-quality social housing enables people to live well and contributes to their overall quality of life. Housing associations allocate approximately 38% of their annual investments to sustainability measures and improvements to existing homes.

We monitor the impact of our financing by assessing the extent to which the housing associations we finance contribute to the size and quality of the housing stock. The housing association sector is a key part of our loan portfolio. We only provide loans to this client group where these are guaranteed by the Social Housing Guarantee Fund (Waarborgfonds Sociale Woningbouw, WSW).

Policy, measures and objectives

Here we elaborate on our policies, measures and objectives relating to the theme of social housing (entity-specific).

Policy

Housing associations ensure the availability and affordability of sufficient social housing for people who need it. Together, they manage more than 2.3 million rental apartments, where 4 million people live. This is 28% of the Dutch housing stock. Because of the size of their housing stock and their social mission, housing associations are expected to play a pioneering role in sustainability.

The abolition of the landlord tax on 1 January 2023 has given housing associations an additional €1.7 billion in annual investment capacity. This is balanced by binding National Performance Agreements between the sector, municipalities, the Woonbond and the government. In addition to doubling social housing construction, these agreements include making more than 675,000 social housing units more sustainable. This requires significant investment. Housing associations are expected to borrow more in the coming years because of the sustainability challenge, the country's housing shortage and the associated investments. By keeping financing costs low for housing associations and aiming for a market share of at least 33%, we are enabling the construction of 30,000 new homes a year from 2029 to 2035. In addition, we are financing the development of district heating networks, with the aim of achieving year-on-year nominal growth in the outstanding district heating loan portfolio. This supports our goal that by the end of 2028, no rental dwelling will still have an EFG energy label, with exceptions including listed buildings and dwellings with temporary use.

Our aim is to provide financing at favourable terms to help social housing associations provide high-quality housing to the core target group. We do not have a formal policy on the impact of this financing on end-users. We do not have a formal policy, as it is part of our statutory duty to provide financing to housing associations. This limits our scope to impose additional requirements or to implement policy measures. Although not formalised as a policy, we set targets and implement measures to increase and ensure our positive impact and to mitigate existing negative impacts. We monitor progress through our four impact KPIs and through close contact with the sector.

Measures

Our measures consist of commitments and financing choices. Through these measures, we help reduce waiting lists and increase the availability of high-quality social rental housing.

We finance or do not finance certain activities, and we have recently started using positive pricing. Our IROs only focus on services of general economic interest (SGEI), i.e. the parts of housing associations' operations that can be defined as being 'social'. In addition, we offer discounts under SLLs for achieving certain targets. All measures relate to the financing of the social housing association sector and affect their (potential) tenants. The measures will continue indefinitely.

In the **'Our influence'** section, we discuss in more detail how our measures contribute to the material topics. We want to encourage our clients to contribute to the targets, but we have no direct influence over them. We will evaluate the impact of our measures in the coming years.

Positive pricing

In 2025, 10 sustainability-linked loans included social housing targets (2024: 5). This is a common theme in performance agreements. Through these agreements, our clients commit to providing housing for specific target groups or improving the liveability of homes and neighbourhoods, for example.

Active financing

We only finance the portion of the social housing associations' debt that is guaranteed by WSW. These are SGEI activities, which ensure that all our lending to this sector helps create added value for society. Social housing associations provide good and affordable housing for people who need it. In many cases, these are households with modest incomes. Moreover, they pay special attention to people who are unable to find

a place to live for social, medical or psychological reasons, as well as to 'status holders' (refugees granted residence permits).

Targets and standards

Everyone will be familiar with the acute shortage of affordable housing. To address the housing shortage, housing associations have set a target in their performance agreements to build at least 30,000 new homes a year from 2029 towards a total of 180,000 in 2035. We will review annually whether this construction target has been met. The construction pace will need to increase significantly in the coming years to meet the target.

In addition to the provision of sufficient housing, the quality of housing is of great importance to (potential) tenants. Overdue maintenance is a challenge, but there are also major sustainability challenges. In our climate policy, we discuss the problem of consumption and emissions. Sustainability is also a social issue. Energy poverty is on the rise, and even more sustainable housing must remain affordable for people with limited financial means. Our policy contributes to the goal that by the end of 2028, no rental dwelling will still have an EFG energy label, with exceptions including listed buildings and dwellings with temporary use. We support this objective as set out by housing associations in their performance agreements.

We apply these targets to all our client housing associations, using 2023 as the base year (increase in social rental homes: 7,300, EFG labels: 9.3%). We have not consulted stakeholders on these targets, as we comply with existing agreements or legal frameworks. In 2024, two years after the signing of the National Performance Agreements 2022, the agreements were reviewed and adjusted where necessary. We have not linked policy to the targets.

We have not yet formulated concrete objectives for the allocation of social housing and spending by housing associations on maintenance, quality of life and energy. We are currently assessing the effectiveness of our measures based on the results of the KPIs.

Social housing standards

KPIs	2025	2024
Increase in social housing	7,890	5,832
Social housing allocated to target	65.7%	67.0%
Housing association expenditures on maintenance, quality of life and energy	9.7 bln	7.9 bln
EFG labels	6.0%	7.0%

For our social impact standards, we rely on data provided directly by housing associations; therefore, this is not a source of high measurement uncertainty. Currently, this data is reported with a one-year delay relative to the most recent financial year. In the **Appendix**, we describe the data quality and source data for each indicator. We are in discussions with the umbrella organisation Aedes to accelerate the delivery of information. We expect to resolve this measurement uncertainty within a few years. Additional information is included in the separately published **ESG Impact Report**.

Increase in social housing units

We use the indicator 'Increase in social rented dwellings' for the availability of social rented dwellings. Long waiting lists for social housing have become commonplace in the Netherlands. While demand is growing, the huge construction task is only being realised in fits and starts. Lengthy zoning procedures, a shortage of available building land and higher construction costs all play a role. In 2025, the number of dwellings owned by social housing associations we finance increased by 7,890 (2024: 5,832).

We use the 'social housing allocation' indicator to measure the effectiveness with which available social housing is allocated. To determine our impact, we look at the number of rental property allocations within the income limits of the housing associations we finance each year. Housing associations primarily target households with an income below the SGEI income limit. For single-person households, this limit is €46,669 a year as of 1 January 2025. For households with multiple occupants, this limit is €54,847 a year as of 1 January 2025.

While approximately 80% of available housing was previously allocated to the primary target group, regional

agreements now often use a 70/30 guideline. With current percentages of 66% (2025) and 67% (2024), the associations are approaching the desired allocation ratio.

Housing association expenditures on maintenance, quality of life and energy

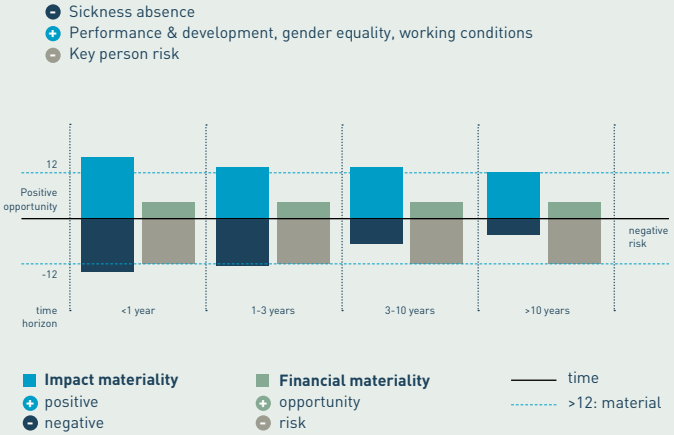
We use the indicator 'Housing associations expenditure on maintenance, quality of life and energy' to measure the quality of social housing. Housing associations are investing more and more in maintenance, quality of life and energy. The increase in expenditure on quality of life and energy efficiency, or even energy production, is certainly a good indicator of quality improvement. Quality of life mainly includes housing and environmental improvements. Energy includes investment in solar panels. Overall, investments increased by 17.7% in the period 2023-2024 (2022-2023: 7.3%). This increase is mainly due to rising construction costs, but it also includes spending on maintenance, quality of life, and energy. Based on the three-year average growth rate, inflation, and necessary investments, we expect a further increase in 2025.

EFG labels

We use the 'EFG labels' indicator for the quality of social rented dwellings. The presence of an E, F or G label is a good indicator of a dwelling's energy efficiency, with a major impact on potential fuel poverty and tenants' comfort. After 2028, housing associations will have to offer rent reductions for homes with these labels.

Between 2024 and 2025, there was a sharp drop of more than 10% in the number of EFG labels in the housing association stock. This brought the percentage of dwellings with an E, F or G label down to 6% (2024: 7%).

Our own employees ESRS S1



	Achieved		Target
KPIs	2024	**2025**	2025
Sickness absence (I–)			
Long-term sickness absence rate	2.8%	**3.4%**	<4%
Short-term sickness absence rate	0.7%	**0.5%**	<1%
Performance & development (I+)			
Training hours per employee	41	**30**	
Employees with P&D	99%	**92%**	
Gender equality (I+)			
Gender pay gap			
Percentage of women on the Managing Board	50%	**33%**	30%
Percentage of women in the Management Team	54%	**47%**	30%
Working conditions (I+)			
Employees covered by collective labour agreement	100%	**100%**	
Number of complaints 0 1	0	**1**	
Key person risk (R)			
Key person risk identified	100%	**100%**	

We can only fulfil our role in financing the Dutch public sector if we are well-equipped as an organisation. This is the basis of our strategy. Our employees are motivated and qualified to serve the public interest in their own way. As an organisation, we set a good example in terms of sustainability and social commitment.

The strength of our organisation lies largely in its compact and well-organised structure. Although we have grown considerably over the past year, from 145 own employees at the end of 2024 to 172 own employees at the end of 2025, we are maintaining our compact organisational structure and open culture as much as possible.

We have a positive impact through our policy on gender equality, terms of employment, and performance and development. As an employer, NWB Bank has a duty to ensure gender equality among its employees. The organisation's policies and results in this area have a positive impact on employees.
The bank offers good terms of employment, including a collective labour agreement, employee participation and complaints mechanisms. By offering these terms, the organisation has a positive impact on its employees. Finally, we promote employee development by providing guidance on performance and development. One potential negative impact on employees' working conditions is illness-related absenteeism, but multiple factors contribute to it.

In recent years, like other companies in the Netherlands, the organisation has had to deal with a slightly higher rate of illness-related absenteeism. However, this has now fallen within our maximum target rate.

Finally, we have identified a risk associated with the organisation's compact structure. To mitigate key person risk, it is important that we attract and retain the employees necessary to run the bank's operations. The organisation's dependence on its highly educated employees poses a potential financial risk. The possible departure of staff, as well as the recruitment and training of new employees, incurs costs.

To safeguard the foundation of our strategy, it is important to monitor risks, opportunities and their impact on our employees. To this end, we have established one or more KPIs for each material IRO.

Policy, measures and objectives

We pay great attention to the well-being of our staff, as well as to developing their knowledge and skills. Our policy, measures, objectives and standards are explained in more detail below. The policy primarily focuses on our employees rather than external employees. Our employees include full-time and part-time employees.

Policy and measures

In terms of policy, we focus on well-being, development, and fostering a healthy and social working environment. The HR department is responsible for personnel policy within the bank, which includes the areas of focus listed below. The department also sets targets and monitors results. The department reports to the CEO, who therefore bears ultimate responsibility.

Absenteeism

We are committed to promoting the mental and physical health of our employees, providing a safe work environment, and encouraging healthy behaviour. This helps proactively mitigate absenteeism, limiting the negative impact on employees and the organisation. Due to the relatively limited staff size, individual cases have a proportionately significant effect. Our policy consolidates all measures to ensure a healthy and safe workplace. We receive support on health and safety matters from an external occupational health service (arbodienst), enabling us to provide well-founded absenteeism advice and reintegration support. The Eligibility for Permanent Incapacity Benefit (Restrictions) Act (Wet verbetering poortwachter, Wvp) serves as our guiding framework. All employees can use the company doctor's consultation hours for preventive, anonymous advice. We also offer regular voluntary medical check-ups. Although accidents at work are less likely in an office environment, we do, of course, have a company emergency response team. The prevention officer (HR employee) monitors absenteeism on a quarterly basis.

Our measures focus on awareness and support. We participated in National Vitality Week 2025, in which employees were able to attend several master classes and e-learning sessions on resilience, focus, lifestyle, work-life balance and energy management.

We also focus on mental well-being, and managers engage in regular dialogue with their employees. When it comes to development or personal situations, we offer the opportunity to participate in a development and/or coaching programme. We have a prevention officer who is constantly working to create a healthy working environment that promotes well-being and reduces stress. Through these activities, we are proactively contributing to the health of our employees.

Performance management and training

We encourage our employees to develop their knowledge and skills so that they can contribute effectively to achieving our strategic goals. We have a training budget available for this purpose but no formal policy. Personal development ensures a positive impact. Managers and employees regularly discuss their objectives together, taking into account the bank's core competencies and skills required for their roles.

An important measure we have taken is the revision of the performance management cycle, which started in 2024. The revised cycle consists of a kick-off, at least two catch-up meetings and a year-end evaluation. It places the employee at the centre and focuses on seeking and receiving feedback from direct colleagues.

In addition, we use HR tools such as strategic people planning (SPP) and talent management (9-box grid). These tools provide insight into the organisation's long-term needs and employees' development potential, helping manage and develop talent.

Gender equality

Our remuneration policy is designed to support our ability to attract and retain skilled professionals and reflects our societal role as a bank by and for the public sector. This requires a moderate and clear remuneration policy that is in line with our strategy, risk profile and risk appetite. We adhere to the collective labour agreement (CLA) for the banking sector and comply with national and international laws and regulations. The policy applies in full to all employees, regardless of position, gender or level. We provide equal pay to employees in comparable positions.

Attention to equal pay for employees in comparable positions remains important.To promote transparency and equal pay, we introduced a job classification system in 2025.

The remuneration policy for the Managing Board is explained in the **Remuneration Report** in the governance section of the Report of the Managing Board report.

CLA and complaints management

The collective labour agreement and the organisation's grievance management relate to the employment conditions we create for our employees. This forms part of our overarching policy, and no separate measures have been taken recently.

The CLA for the Dutch banking sector includes additional provisions to protect employees, as well as agreements on illness, unemployment, disability, parental leave, and pensions. Employees can purchase additional leave, and there is a special arrangement for unpaid leave. Through the CLA and compliance with Dutch laws and regulations, the bank complies with human rights legislation. The CLA has a positive impact on working conditions.

We aim to be a modern employer that supports hybrid working, except for roles involved in operational transaction processes. Our hybrid work policy enables employees to perform optimally by combining office and remote work. We also structure the work week efficiently, aligning activities and consultation processes. Employees can access (special) leave arrangements tailored to their personal situations, such as statutory parental leave. Our premises are easily accessible to people with disabilities.

In the unlikely event that employees feel they are being mistreated, they have access to an external confidential advisor. An employee can make a formal complaint about inappropriate behaviour to our external complaints committee. We also have a whistle-blower policy that allows employees to report suspected abuse without jeopardising their legal position.

Our zero-tolerance approach to undesirable behaviour is firmly embedded in our policy on the issue, which was revised in 2024. An employee who is the victim of any form of inappropriate behaviour can report it internally to their manager or to Human Resources, contact our external confidential advisor or make a complaint to an independent external committee, after which they will handle the complaint. This includes issues such as discrimination and bullying. Complaints also carry the risk of reputational damage. The Managing Board monitors the rules on inappropriate behaviour.

The whistle-blower policy and the rules on inappropriate behaviour are available to employees on the intranet, together with a careful explanation of the process. The Compliance department handles reports under the whistle-blower policy.

Key person risk

As a significant bank, we have a great responsibility towards our clients and the financial system. At the same time, the size of our workforce is somewhat limited, with 172 employees at the end of 2025. A small group of employees with relatively important (operational) responsibilities can lead to key person risk, where the absence of certain employees can have significant operational consequences. To mitigate this risk, we identify key person risks and implement measures.

Key person risk can lead to increased operational risk, increased costs or losses, or reputational damage. Our key person risk policy helps manage and monitor this risk, aiming to mitigate it. Each department has identified its key person risks. There are four classifications that indicate the level of key person risk:

- Low: no cause for concern, no mitigation required;
- Medium: some cause for concern, mitigation required within six months;
- High: cause for concern, mitigation required within three months;
- Critical: serious cause for concern, immediate mitigation required.

As a measure to mitigate key person risk, we establish processes in job descriptions and manuals and recruit personnel to limit critical dependencies. Key person risk has been included as an entity-specific issue. We have no KPI for this.

Stakeholder management

We keep a close watch on developments through various studies and consultations.

Employee feedback

We conduct employee satisfaction and job satisfaction surveys to obtain feedback from our employees. These surveys focus on how they perceive their job and the organisation. Employees complete a questionnaire on a range of topics including satisfaction, involvement, influence, workload and safety. We discuss the survey results internally and, where necessary, develop an action plan to improve the situation. Such a survey was carried out in 2025.

Works Council

The Works Council is the official consultative body between the Managing Board and employees. Last year, the Managing Board formally consulted the Works Council four times. Topics discussed include the pension scheme, the employee satisfaction survey, organisational changes, the job classification system, and housing. Members of the Supervisory Board attend these meetings twice a year. In addition, there is a quarterly discussion with the Works Council on HR performance, including sickness absence, where the actual figures are compared with the targets. The Works Council can then give advice.

Standards and targets

For the standards relating to our own employees, we have only used information from within our bank. This means there is not a high degree of measurement uncertainty, as the data comes directly from the bank's systems and is free of assumptions. For the IROs relating to performance & development, employment conditions, key person risk and complaints, we do not set formal targets, but monitor the development of the relevant KPIs. We do not set targets in these areas because the development of the KPIs provides us with a better insight. Our KPIs provide a clear picture of developments in the area of personnel. In this context, we consider that setting specific targets does not add value for monitoring and decision-making.

COMPOSITION OF THE WORKFORCE

	2025		2024	
	Number	%	Number	%
Employees 50 to 70 years	57	33%	43	30%
Employees 30 to 50 years	95	55%	85	59%
Employees 20 to 30 years	20	12%	17	12%

Number	2025	2024
Men	107	85
Women	65	60
Other	0	0
Not reported	0	0
Total employees	**172**	**145**

In 2025, we hired 46 new employees (2024: 39), and 19 employees left our organisation (2024: 25). We use the number of employees who left as the denominator and the average number of employees in the financial year as the numerator to calculate the turnover. This brings the turnover to 12% (2024: 17%) based on the number of employees as of 31 December 2025. This has brought the percentage back to a normal level. The financial statements include a breakdown of **personnel costs**.

The bank's top management consists of the Managing Board and the management team.

	Number	%
Number management team	15	
Of which men	8	53%
Of which women	7	47%
Number Managing Board	3	
Of which men	2	67%
Of which women	1	33%

The data above is from the AFAS HR system. They are year-end figures based on the number of our own employees.

One of the key diversity tools is gender. The gender targets for the Managing Board - at least 30% women and 30% men - also apply to the bank's senior management. In 2025, the target for the Managing Board was achieved with 33% women/67% men (2024: 50% women/50% men) and for management 47% women/53% men (2024: 54% women/46% men). We achieve balance by giving

preference to candidates who contribute to diversity and inclusion when filling vacancies of equal merit.

External employees

We engage external employees for both line activities and projects. At the end of 2025, it concerned 56 people (2024: 47), 16 of whom were involved in line activities (2024: 15). Of these, 47 were external employees (2024: 36) contracted through a service provider, while 9 were self-employed (2024: 11). This data comes from the supplier management system. With the exception of employment conditions, NWB Bank's rules generally apply to all staff, including external employees. In principle, they do not have a significant impact on business activities. The increase in the number of external employees at year-end 2025 compared to 2024 is largely attributable to the need for extra capacity for projects.

CLA

By the end of 2025, all employees were covered by the CLA for the banking sector (2024: 100%). The three members of the Managing Board are not covered by the banking CLA, although most of the terms and conditions of employment arising from the CLA apply to them. The main principles governing the employment conditions of the Managing Board are set out in the Managing Board's **remuneration policy**.

All employees are legally entitled to social protection in the event of loss of income due to incapacity for work or illness (WIA), unemployment (WW) and retirement (AOW). Additional arrangements are set out in the CLA for the banking sector, including continued salary payment during the first two years of illness and participation in the PAWW scheme for the third year of illness. In addition, we have arranged a pension scheme and disability insurance for all employees.

All employees are entitled to (special) leave, such as maternity leave, parental leave and carer's leave. The CLA for the banking sector provides additional benefits, such as a supplement to paid parental leave and extended paternity leave. Employees can also purchase additional leave, and a special arrangement is available for unpaid leave. In total, 17 employees (11 men and 6 women) took maternity and/or parental leave (2024: 8 employees: 5 men and 3 women), which is 11% (2024: 6%).

The data above are from the AFAS HR system. They are year-end data based on the number of employees. In 2024, 65 men and 45 women held permanent contracts, while 20 men and 15 women held temporary contracts. In 2024, 77 men and 46 women were employed full-time, while 8 men and 14 women worked part-time.

	Men	Women	Other	Not reported	Toaal
Number of employees	107	65	0	0	**172**
Employees with a permanent contract	85	57	0	0	**142**
Employees with a temporary contract	22	8	0	0	**30**
Employees with non-guaranteed hours	0	0	0	0	**0**
Full-time employees	91	47	0	0	**138**
Part-time employees	16	18	0	0	**34**

Performance and development

	2025	2024
Number kick-off forms men (in %)	54%	58%
Number kick-off forms women (in %)	38%	41%
Average number of training hours per employee (men)	34	
Average number of training hours per employee (women)	23	

In 2025, an average of €3,305 was spent on training per employee, including in-company training (2024: €4,057), with a budget (€3,000) overspend of €305 (2024: €1,057). The management development programme has been replaced by individual development programmes. Learning on the job plays a key role in our organisation's approach to learning and development. Alongside individual development, we organised corporate training on risk awareness last year. We also support internal career growth by prioritising internal candidates for open positions. The number of training hours is based on the individual training hours recorded in the training form. In

2024, information on training hours was not recorded on the training form; therefore, this information is missing from the table above. Collective training hours are not included. All employees participate in the performance programme, and 92% completed the kick-off form for the performance cycle, based on the number of employees at the beginning of the year (2024: 99%).

Absenteeism

	2025	2024	Target 2025
Percentage absenteeism long term	3.4%	2.8%	< 4%
Percentage absenteeism short term	0.5%	0.7%	< 1%

Absenteeism is below target according to the occupational health and safety report. The subject of absenteeism due to illness has been included as an entity-specific item.

Key person risk

For all departments (100%), we assessed key person risk (2024: 100%). No critical key person risk was identified. This information was collected from managers at the end of September 2025.

Gender equality

For this Annual Report, we have relied on the quick fix for S1-16. The current analysis does not yet consider factors that may influence remuneration, such as age and role. Therefore, it does not provide a reliable view of the principle of equal pay for equal work. We will improve the analysis in 2026.

Pay ratio

The pay ratio between the CEO, as the highest-paid employee, and the median of all other employees was 4.4 (2024: 4.1). Total compensation comprises all relevant elements from the ESRS (salary, pension, and other secondary terms of employment) and is based on the AFAS HR system.

Complaints

In 2025, one notification was made under the whistleblower scheme (2024: 0). External investigation has shown that there is no case of malpractice or irregularity under this regulation. In addition, one complaint about undesirable behaviour was submitted (2024: 0). This concerns complaints registered in accordance with the policy. The Supervisory Board monitors the functioning of the scheme. Handling any complaints properly enables us to learn a great deal about undesirable incidents and how to prevent them.

GOVERNANCE INFORMATION

Financial & economic crime risk ESRS 2





Financial and Economic Crime (FEC) is a specific material issue of broad importance in the financial sector. Financial crime risk may arise from involvement in criminal activities such as money laundering and terrorist financing (AML/CFT), sanctions evasion, corruption and bribery, tax integrity breaches, and market abuse, including insider trading. While we do not identify material impacts or opportunities in this area, we do recognise the potential risk associated with such activities.

The risk of financial violations arises from possible involvement in money laundering, terrorist financing, sanctions evasion, corruption, bribery and market abuse. These can result in financial damage, including fines imposed for incidents or non-compliance with laws and regulations. NWB Bank has a low risk appetite for relationships and transactions that could expose the organisation to financial and economic crime risks.

Risk management In recent years, we have strengthened the compliance function further and optimised several processes, including customer due diligence and transaction monitoring. These changes demonstrate the importance we attach to compliance activities.

We therefore seek to prevent any participation in, facilitation of, or involvement in such risks. The general principles of risk management and the 'three lines model' are described in the management approach section. The CCLO is responsible for ensuring compliance with relevant laws and regulations.

The risk of financial crime is inherent in the banking business. The residual risk is low and falls within our organisation's risk appetite.

Policy and measures

We apply the following policy and measures to limit the risk of financial crime.

Policy

As a gatekeeper, we take our role in protecting the integrity of the financial system seriously. This commitment is reflected in three policies relating to financial crime: the financial crime risk policy (FCR), the bribery and corruption policy, and the market abuse policy. The Compliance department is responsible for keeping these policies up to date.

Financial crime – The FCR policy, based on the Dutch Anti-Money Laundering and Counter-Terrorist Financing Act (Wwft), sanctions legislation, and applicable EU legislation and directives, sets out our approach to detecting money laundering, terrorist financing, tax evasion, and the violation or circumvention of applicable sanctions regimes. The FCR policy applies to all departments. Each department head and/or process owner is responsible for implementing the FCR policy requirements and integrating them into their business processes.

Bribery and corruption – The bribery and corruption policy establishes principles and standards for managing the risks of corruption and bribery. It also encourages employees to report suspicions of bribery or other forms of corruption within or in connection with NWB Bank. We aim to conduct all business activities in an honest, ethical and transparent manner and to comply with all applicable anti-bribery and corruption laws and regulations, including those set out in the Criminal Code. As a financial institution, we are also subject to the integrity requirements of the Dutch Financial Supervision Act (Wft), which require controlled and ethical business operations, including the prevention of corruption. The policy applies to all internal and external employees.

Market abuse – The market abuse policy promotes integrity in the financial markets and aims to prevent market abuse through four key provisions: 1. the prohibition of insider trading; 2. the prohibition of the unlawful disclosure of inside information to third parties; 3. the obligation for issuers to disclose price-sensitive information in a timely manner; and 4. the prohibition of market manipulation. In line with the Wft and applicable EU regulations, the market abuse policy applies to all insiders and seeks to ensure a high level of understanding and awareness of market abuse and its relevance to NWB Bank's activities.

Measures

As a compact organisation, we ensure that our approach to financial crime remains appropriate and up to date. To assess the effectiveness of our policies and the adequacy of capacity in the field of financial crime, we conduct an annual Systemic Integrity Risk Analysis (SIRA). All employees are also required to sign the Code of Conduct and the Bankers' Oath, and a training programme is in place. We use an Internal Control Framework to monitor and manage financial economic crime (FEC) risk. Controls are tested by the first line and monitored by the second line. Findings and incidents are followed up in a structured manner.

Training plan – A training plan is in place to ensure the FCR policy and resulting procedures are embedded within the organisation. The training plan includes: 1. initial and regular training courses; 2. defined target groups, training course frequency and appropriate content; 3. communication of the training plan to relevant employees and management.

Processes and controls – Processes and a control framework have been established to periodically review and monitor the policy's implementation and effectiveness. NWB Bank takes an integrated approach to non-financial risks, including operational risks and integrity risks relating to financial crime. Controls relating to customer due diligence (CDD), transaction monitoring and the training of employees and relevant specialists are tested by the first line within the administrative organisation/internal control process. The Compliance department monitors processes and controls that have been designated as 'key controls' in accordance with the applicable standard. The CCLO, as a member of the Managing Board, has been designated as the person responsible for compliance with the Wwft, the Sanctions

Act and the European Banking Authority (EBA) guidelines on the role of the AML/CFT compliance officer.

Based on the policy framework and these measures, the residual risk is low and falls within the organisation's risk appetite. As a result, the effectiveness of the policy and measures is also assessed.

Standards and targets

In the area of FEC, there are no suitable standards or targets for external publication as this is not a priority.

APPENDIX BASIS OF PREPARATION FOR THE SUSTAINABILITY STATEMENTS

This appendix explains the principles applied to the preparation of non-financial information.

METHODOLOGY AND ESTIMATES

The information about our business operations comes from our information systems. We also use Het PON & Telos, a knowledge enterprise affiliated with Tilburg University, to apply the Partnership for Carbon Accounting Financials (PCAF) methodology to determine the CO_2e footprint of our loan portfolio. Information about our operations comes from our own information systems. We also use Het PON & Telos, a knowledge company affiliated with Tilburg University, to apply the Partnership for Carbon Accounting Financials (PCAF) methodology to determine the carbon footprint of our loan portfolio. They also calculated the KPIs for the impact on the value chain. A methodology is available for both calculations, which are explained in our annual **PCAF** and **Impact** reports.

The KPIs and metrics in this report have been verified only by the appointed auditor. The base years and overarching targets applied were established for 2024 and therefore prior to the start of reporting in accordance with the ESRS.

In addition to information on the fiscal year ended, these Sustainability Statements include comparative figures for the previous year. Where methodologies have changed, comparative figures have been restated to ensure comparability. This applies, in particular, to parts of our CO_2-equivalent (CO_2e) footprint. Where relevant, we mention this in a footnote.

In applying the requirements of the ESRS, we cannot avoid making assumptions and using approaches that are fundamental to the reported information. The basis for and implementation of these assumptions are documented for each data point in the PCAF and Impact reports mentioned above. We have identified the following indicators as being subject to measurement uncertainty:

- Climate mitigation: Financed emissions
- Energy: Audacious goal
- Water management: Drinking water quality

We still see significant potential to further improve the provision of information. We try to continuously improve data quality by using the most recent source material, limiting assumptions and taking advantage of any new, higher-quality sources. Preferably, our data comes from direct sources or is confirmed by relevant stakeholders.

Changes

In the 2024 sustainability report, the bank's scope 1 & 2 emissions reduction was reported incorrectly. The correct reduction in own scope 1 and 2 emissions for 2024 was 77.4% (report 2024: 27.7%). This has been corrected in the 2025 report.

Time horizon

In determining the time horizon for impacts, risks and opportunities, we follow the ESRS for the short term. For the medium and long term, we deviate to align with our ESG risk management framework, where the medium term is 1-3 years and the long term is 3-10 years. These horizons are based on prudential laws and regulations, including the Capital Requirements Regulation (CRR), Capital Requirements Directive (CRD) and the guidelines of the ECB and the EBA, as well as the ECB Guide on Climate-related and Environmental Risks. The time horizons we use are longer than those prescribed in ESRS, which emphasises the long-term perspective of our business model. In looking ahead, we use two medium-term time horizons of 1-3 years (short-medium term) and 3-10 years (long-medium term) and a long-term time horizon of >10 years, identifying

IROs for all these periods. We define the short or current term as <1 year.

Quick fix reporting requirements

For certain provisions and reporting requirements under the CSRD, we make use of the 'quick fix' for the phase-in provisions. This means that the implementation and reporting of these specific requirements have been postponed. Only after one or more years do we have to comply with the following (full) requirements:

DR E1-09 on anticipated financial impacts of material physical and transition risks and potential climate-related opportunities. In the coming period, we will further develop relevant scenarios so we can meet these requirements in the future.

DR S1-16 on, among other things, the *gender pay gap*. For companies with fewer than 750 employees, a phase-in is possible. We will include an analysis from next year. We are currently working on a method to better compare positions, enabling us to report a more balanced gender pay gap.

UN GLOBAL COMPACT

We support and have signed the principles of the UN Global Compact. This means that we are committed to addressing key themes such as human rights, labour rights, the environment and anti-corruption in our business processes. It also means that, when possible and relevant, we will engage with our stakeholders on the content of these principles.

IMPACT OF LENDING ON CLIMATE

To calculate the impact of our lending on the climate, we use the methodology of the Partnership for Carbon Accounting Financials (PCAF). In December 2025, the new version of the methodology was published; it will be applied for the first time next year. PCAF provides a framework and harmonised methodology that increases transparency and awareness of greenhouse gas emissions equivalents. The knowledge institute Pon & Telos, affiliated with Tilburg University, helped us to apply the PCAF methodology. The application has been included in the report ***GHG Emissions of NWB Bank's Loan Portfolio: The GHG footprint of 2024***. All ESRS requirements have been incorporated in the Sustainability Statements. This report contains only additional information and falls outside the scope of EY's assurance opinion.

Data quality

The quality of the data is an important element for calculating the emissions of our loan portfolio. See the methodology document for further details. The following scores apply for the calculation.

PCAF distinguishes five levels of quality for emissions.

- Class 1 concerns individual emissions data or actual energy consumption data that has been audited.
- Class 2 concerns unaudited emissions data or other primary consumption data.
- Class 3 concerns average data specific to the sector or similar institutions.
- Class 4 concerns approximate data based on a region or country.
- Class 5 concerns rough estimates.

Methodology used

We have calculated our share of a client's or project's emissions by determining the percentage of the client's or project's balance sheet attributable to our financing and multiplying that percentage by the client's total greenhouse gas emissions (equivalents). The emissions data are derived or calculated from, among other sources, publicly available data from Statistics Netherlands, the Netherlands Environment and Transport Inspectorate, the water authorities' Climate Monitor and the sustainability reports of the financed institutions. The CO_2e footprint of the loan portfolio has been calculated for 2024. This is because granular data on client consumption is often a year out of date. The CO_2e footprint of the loan portfolio has been calculated for 2024, as granular client consumption data often lags by one year. The CO_2e footprint of the loan portfolio has been calculated for 2024, as granular client consumption data often lags by one year. For 2025, this footprint has been extrapolated based on the growth of the loan portfolio, updated emission factors and an estimate of changes in clients' gas and electricity consumption.

If the methodology is adjusted, the previously reported figures will be recalculated. This is the case with municipalities and educational institutions. The baseline measurement is recalculated (2019, for the 2018 portfolio), as well as the current year and the previous year.

Limitations

There is still insufficient data available on the extent of emissions avoided or negated by projects we have financed. Nor is it possible yet to calculate the scope 3 emissions for housing associations, such as those resulting from the construction and major maintenance of housing association properties. This also applies to NHG pass-through RMBS, joint schemes and healthcare institutions. No calculations or data are available yet to make a reasonable estimate of these emissions.

Changes

The actual emissions for 2024 differ from the extrapolation published last year. This is due to methodological differences between the full PCAF calculation and the extrapolation performed for the current financial year. The recalculation uses actual data wherever possible, providing a more accurate picture of the portfolio's emissions.

	2024 - old			2024 - new			Difference (δ) old/new		
	Total	Scope 1, 2	Scope 3	Total	Scope 1, 2	Scope 3	δ total	δ scope 1, 2	δ scope 3
Financed emissions (tCO_2e)	**1,511,197**	**1,168,063**	**343,134**	**1,496,151**	**1,141,640**	**354,512**	**-1.0%**	**-2.3%**	**3.3%**
Social housing	**329,502**	**329,502**	**-**	**352,202**	**352,202**	**-**	**6.9%**	**6.9%**	**0.0%**
Housing associations	329,502	329,502	-	352,202	352,202	-	6.9%	6.9%	0.0%
Government	**741,674**	**535,101**	**206,573**	**719,090**	**503,915**	**215,175**	**-3.0%**	**-5.8%**	**4.2%**
Water authorities	543,387	485,031	58,355	528,127	468,352	59,775	-2.8%	-3.4%	2.4%
Municipalities	190,363	49,572	140,791	180,905	35,121	145,784	-5.0%	-29.2%	3.5%
Provinces	7,924	497	7,427	10,057	442	9,616	26.9%	-11.2%	29.5%
Other government clients	-	-	-	-	-	-	0.0%	0.0%	0.0%
Healthcare	**59,493**	**48,998**	**10,495**	**43,212**	**32,327**	**10,885**	**-27.4%**	**-34.0%**	**3.7%**
Healthcare institutions	59,493	48,998	10,495	43,212	32,327	10,885	-27.4%	-34.0%	3.7%
Grid operators and utility companies	**58,562**	**27,935**	**30,626**	**65,580**	**32,747**	**32,834**	**12.0%**	**17.2%**	**7.2%**
Drinking water companies	43,025	27,935	15,090	48,223	32,747	15,477	12.1%	17.2%	2.6%
Renewable energy	15,537	-	15,537	17,357	-	17,357	11.7%	0.0%	11.7%
Education	**932**	**932**	**-**	**1,056**	**1,056**	**-**	**13.3%**	**13.3%**	**0.0%**
Educational institutions	932	932	-	1,056	1,056	-	13.3%	13.3%	0.0%
Financial	**56,027**	**56,027**	**-**	**54,182**	**54,182**	**-**	**-3.3%**	**-3.3%**	**0.0%**
Credit and other financial institutions	-	-	-	-	-	-	0.0%	-	0.0%
NHG pass-through RMBS	56,027	56,027	-	54,182	54,182	-	-3.3%	-3.3%	0.0%
Other	**265,006**	**169,567**	**95,439**	**260,830**	**165,212**	**95,618**	**-1.6%**	**-2.6%**	**0.2%**
Other clients	265,006	169,567	95,439	260,830	165,212	95,618	-1.6%	-2.6%	0.2%

For 2018, the 'municipalities' and 'education' sectors were recalculated using new benchmarks. These provide a better representation of the actual emissions of the real estate.

	2018 - old			2018 - new			Difference (δ) old/new		
	Total	Scope 1, 2	Scope 3	Total	Scope 1, 2	Scope 3	δ total	δ scope 1, 2	δ scope 3
Financed emissions (tCO_2e)	**1,590,101**	**1,316,043**	**274,058**	**1,570,942**	**1,296,884**	**274,058**	**-1.2%**	**-1.5%**	**-**
Government	**1,010,853**	**754,613**	**256,240**	**991,640**	**735,399**	**256,240**	**-1.9%**	**-2.5%**	**-**
Municipalities	231,344	68,279	163,065	212,131	49,066	163,065	-8.3%	-28.1%	-
Education	**271**	**271**	**-**	**325**	**325**	**-**	**20.1%**	**20.1%**	**-**
Educational institutions	271	271	-	325	325	-	20.1%	20.1%	-

Changes in the financed emissions also affect relative emissions. The following tables indicate the changes per million euro.

	2024 - old			2024 - new			Difference (δ) old/new		
	Total	Scope 1, 2	Scope 3	Total	Scope 1, 2	Scope 3	δ total	δ scope 1, 2	δ scope 3
Financed emissions (tCO_2e)									
Social housing									
Housing associations	10	10	-	10	10	-	7.4%	7.4%	
Government									
Water authorities	61	54	7	59	52	7	-2.8%	-3.3%	1.5%
Municipalities	33	9	24	31	6	25	-4.9%	-29.1%	3.6%
Provinces	25	2	23	32	1	30	26.9%	-12.5%	29.6%
Other government clients									
Healthcare									
Healthcare institutions	30	25	5	22	16	6	-27.0%	-33.6%	3.8%
Grid operators and utility companies									
Drinking water companies	30	19	11	34	23	11	11.8%	18.7%	-0.4%
Renewable energy	17	-	17	19	-	19	9.4%	0.0%	9.4%
Education									
Educational institutions	13	13	-	15	15	-	12.7%	12.7%	
Financial									
Credit and other financial institutions									
NHG pass-through RMBS	20	20	-	21	21	-	5.1%	5.1%	
Other									
Other clients	105	67	38	110	70	40	5.4%	4.3%	7.2%

	2018 - old			2018 - new			Difference (δ) old/new		
	Total	Scope 1, 2	Scope 3	Total	Scope 1, 2	Scope 3	δ total	δ scope 1, 2	δ scope 3
Financed emissions (tCO_2e)									
Government									
Municipalities	35.1	35.1	-	32.2	32.2	-	-8.3%	-8.3%	-

IMPACT REPORTING ON LENDING

Tracking our clients' performance is important to us for several reasons. First, it allows us to track trends over time and engage in discussions with our clients to increase the impact of our lending. It also helps us identify potential risks. A further explanation of this is included in the **Methodology document**.

Methodology used

The impact data is derived from or calculated using public data from Statistics Netherlands, Netherlands Environment and Transport Inspectorate, the WAVES database of the water authorities and the dVi reports of the housing associations, among others.

To ensure accurate reporting, data points must reliably reflect our performance in the most recent financial year. To this end, Het PON & Telos has provided an explanation for each indicator, detailing the sources chosen and the methodology used to determine the impact. In addition, a qualitative review is conducted to identify any significant developments that may render the latest source data an unreliable representation of our performance in the current financial year.

If the review suggests a significant difference between the latest source data and the current results, the data point should be extrapolated. This involves a quantitative estimate of the change, conducted in consultation with Het PON & Telos, along with an explanation of the underlying driver, its relation to the source data date, and its impact on the indicator.

In addition to outdated information, using different data years in parts of an indicator's calculation is a possible source of measurement uncertainty. We are transparent about this and explain the extent to which this applies to the reported indicators in the Outcomes table.

In the event of methodological changes, previously reported figures will be recalculated. The baseline measurement (2020) is recalculated, along with the current and previous years. If no new measurement is available, the most recently reported year will be used as the baseline measurement.

Data quality

The quality of the data is an important factor for calculating the impact. See the methodology document for further details. The following five classes of quality apply to the calculation:

- Class 1 concerns individual emissions data or actual energy consumption data that has been verified.
- Class 2 concerns unverified data or other primary consumption data.
- Class 3 concerns average data specific to the sector or similar institutions.
- Class 4 concerns approximate data based on a region or country.
- Class 5 concerns rough estimates.

DATA POINTS ON THE IMPACT OF LENDING

ESG impact/Impact KPI	Description	Data quality	2024 data year	2025 data year	Source
Safety flood defences	Length of flood defences tested (and found to be compliant to standard of 2050) (km)	3	2023	2024	Association of Dutch Water Authorities
Flood standards	Number of hectares of land not meeting flood standards	3	2023	2024	Association of Dutch Water Authorities
Audacious goal	% of financed grey energy consumption compensated	3	2023	2024	Republiq, client data
Surface water quality (biological, chemical, ecological and overall)	% of surface water meeting the WFD standard	2	2024	2025	Informatiehuis water
Drinking water quality	% of measurements meeting the standard	4	2022	2023	Human Environment and Transport Inspectorate
Managed nature reserves protected	% managed nature reserves protected	2		2021	PDOK / Ministry of Agriculture, Fisheries, Food Security and Nature / Het Waterschapshuis
Green-blue network	% green-blue network in protected areas managed by our clients	2	2023	2024	Cobra Groeninzicht
Social housing allocation	% of allocations per year within income thresholds	2	2023	2024	Aedes
Social housing units built	Number of homes built by housing associations	2	2022	2023	Aedes
EFG labels	% EFG labels in portfolio	2	2024	2025	Republiq
Housing associations' investments in maintenance and renovations	Amount spent by housing associations on maintenance, quality of life and energy	2	2022	2023	Human Environment and Transport Inspectorate

ESRS-INDEX

ESRS	DR	Referentie
ESRS 2	BP-1	General Statement
	BP-2	References
	GOV-1	Corporate governance
	GOV-2	Corporate governance
	GOV-4	Due diligence statement and ESG reporting risk
	GOV-5	Due diligence statement and ESG reporting risk
	SBM-1	Strategy and value creation
	SBM-2	Our stakeholders
	SBM-3	Value chain and materiality
	IRO-1	Value chain and materiality
	IRO-2	ESRS-index
ESRS E1	E1.GOV-3	Remuneration Report [ESRS]
	E1-1	Climate mitigation
	E1.SBM-3	Climate mitigation; Climate adaptation; Energy; Value chain and materiality
	E1.IRO-1	Climate mitigation; Climate adaptation; Energy
	E1-2	Climate mitigation; Climate adaptation; Energy
	E1-3	Climate mitigation; Climate adaptation; Energy
	E1-4	Climate mitigation; Climate adaptation; Energy
	E1-5	Energy
	E1-6	Climate mitigation
	E1-7	Climate mitigation
ESRS S1	S1.SBM-3	Our own employees: Policies, Actions, and Targets
	S1-1	Our own employees: Policies, Actions, and Targets
	S1-2	Our own employees: Policies, Actions, and Targets
	S1-3	Our own employees: Policies, Actions, and Targets
	S1-4	Our own employees: Policies, Actions, and Targets
	S1-5	Our own employees: Policies, Actions, and Targets
	S1-6	Our own employees: Policies, Actions, and Targets
	S1-7	Our own employees: Policies, Actions, and Targets
	S1-8	Our own employees: Policies, Actions, and Targets
	S1-9	Our own employees: Policies, Actions, and Targets
	S1-11	Our own employees: Policies, Actions, and Targets
	S1-13	Our own employees: Policies, Actions, and Targets
	S1-14	Our own employees: Policies, Actions, and Targets
	S1-15	Our own employees: Policies, Actions, and Targets
	S1-16	Our own employees: Policies, Actions, and Targets
	S1-17	Our own employees: Policies, Actions, and Targets
Entiteit-specifiek		
Water	MDR-P	Water management (entity-specific)
	MDR-A	Water management (entity-specific)
	MDR-M	Water management (entity-specific)
	MDR-T	Water management (entity-specific)
Biodiversiteit	MDR-P	Biodiversity and ecosystems (entity-specific)
	MDR-A	Biodiversity and ecosystems (entity-specific)
	MDR-M	Biodiversity and ecosystems (entity-specific)
	MDR-T	Biodiversity and ecosystems (entity-specific)
Sociale huisvesting	MDR-P	Social housing (entity-specific)
	MDR-A	Social housing (entity-specific)
	MDR-M	Social housing (entity-specific)
	MDR-T	Social housing (entity-specific)
Governance	MDR-P	Governance
	MDR-A	Governance
	MDR-M	Governance
	MDR-T	Governance

DATAPOINTS THAT DERIVE FROM OTHER EU LEGISLATION

Disclosure Requirement and Related Datapoint	SFDR (1) Reference	Pillar 3 (2) Reference	Benchmark Regulation (3) Reference	EU Climate Law (4) Reference	Material / Non-material	Page and Paragraph Reference
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	Indicator number 13 of Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816 (5), Annex II		material	**Own employees**
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)			Delegated Regulation (EU) 2020/1816, Annex II		material	**Corporate governance**
ESRS 2 GOV-4 Statement on due diligence paragraph 30	Indicator number 10 Table #3 of Annex 1				material	**Due diligence**
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	Indicators number 4 Table #1 of Annex 1	Article 449a Regulation(EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 (6) Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk	Delegated Regulation (EU) 2020/1816, Annex II		material	**Environmental**
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	Indicator number 9 Table #2 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		non-material	
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	Indicator number 14 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1818 (7), Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		non-material	
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		non-material	
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14				Regulation (EU) 2021/1119, Article 2(1)	material	**Environmental**
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book-Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article12.1 (d) to (g), and Article 12.2		material	**Environmental**
ESRS E1-4 GHG emissions - reduction targets paragraph 34	Indicator number 4 Table #2 of Annex 1	Article 449a Regulation(EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6		material	**Environmental**
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	Indicator number 5 Table #1 and Indicator n. 5 Table #2 of Annex 1				non-material	

Disclosure Requirement and Related Datapoint	SFDR (1) Reference	Pillar 3 (2) Reference	Benchmark Regulation (3) Reference	EU Climate Law (4) Reference	Material / Non-material	Page and Paragraph Reference
ESRS E1-5 Energy consumption and mix paragraph 37	Indicator number 5 Table #1 of Annex 1				non-material	
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	Indicator number 6 Table #1 of Annex 1				non-material	
ESRS E1-6 Gross scope 1, 2, 3 and Total GHG emissions paragraph 44	Indicators number 1 and 2 Table #1 of Annex 1	Article 449a; Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)		material	**Environmental**
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	Indicators number 3 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)		material	**Environmental**
ESRS E1-7 GHG removals and carbon credits paragraph 56				Regulation (EU) 2021/1119, Article 2(1)	material	**Environmental**
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II		non-material	
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Bankiong book - Climate change physical risk: Exposures subject to physical risk			non-material	
ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c)					non-material	
SRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34;Template 2:Banking book -Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral			non-material	
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities paragraph 69			Delegated Regulation (EU) 2020/1818, Annex II		non-material	

Disclosure Requirement and Related Datapoint	SFDR (1) Reference	Pillar 3 (2) Reference	Benchmark Regulation (3) Reference	EU Climate Law (4) Reference	Material / Non-material	Page and Paragraph Reference
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1				non-material	
ESRS E3-1 Water and marine resources paragraph 9	Indicator number 7 Table #2 of Annex 1				non-material	
ESRS E3-1 Dedicated policy paragraph 13	Indicator number 8 Table 2 of Annex 1				non-material	
ESRS E3-1 Sustainable oceans and seas paragraph 14	Indicator number 12 Table #2 of Annex 1				non-material	
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Indicator number 6.2 Table #2 of Annex 1				non-material	
ESRS E3-4 Total water consumption in m3 per net revenue on own operations paragraph 29	Indicator number 6.1 Table #2 of Annex 1				non-material	
ESRS 2- SBM 3 - E4 paragraph 16 (a) i	Indicator number 7 Table #1 of Annex 1				non-material	
ESRS 2- SBM 3 - E4 paragraph 16 (b)	Indicator number 10 Table #2 of Annex 1				non-material	
ESRS 2- SBM 3 - E4 paragraph 16 (c)	Indicator number 14 Table #2 of Annex 1				non-material	
ESRS E4-2 Sustainable land/agriculture practices or policies paragraph 24 (b)	Indicator number 11 Table #2 of Annex 1				non-material	
ESRS E4-2 Sustainable oceans/seas practices or policies paragraph 24 (c)	Indicator number 12 Table #2 of Annex 1				non-material	
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	Indicator number 15 Table #2 of Annex 1				non-material	
ESRS E5-5 Non-recycled waste paragraph 37 (d)	Indicator number 13 Table #2 of Annex 1				non-material	
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	Indicator number 9 Table #1 of Annex 1				non-material	
ESRS 2- SBM3 - S1 Risk of incidents of forced labour paragraph 14 (f)	Indicator number 13 Table #3 of Annex I				non-material	
RS 2- SBM3 - S1 Risk of incidents of child labour paragraph 14 (g)	Indicator number 12 Table #3 of Annex I				non-material	
ESRS S1-1 Human rights policy commitments paragraph 20	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I				non-material	

Disclosure Requirement and Related Datapoint	SFDR (1) Reference	Pillar 3 (2) Reference	Benchmark Regulation (3) Reference	EU Climate Law (4) Reference	Material / Non-material	Page and Paragraph Reference
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21			Delegated Regulation (EU) 2020/1816, Annex II		non-material	
ESRS S1-1 processes and measures for preventing trafficking in human beings paragraph 22	Indicator number 11 Table #3 of Annex I				non-material	
ESRS S1-1 workplace accident prevention policy or management system paragraph 23	Indicator number 1 Table #3 of Annex I				non-material	
RS S1-3 grievance/complaints handling mechanisms paragraph 32 (c)	Indicator number 5 Table #3 of Annex I				material	**Own employees**
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	Indicator number 2 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		non-material	
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	Indicator number 3 Table #3 of Annex I				non-material	
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	Indicator number 12 Table #1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		non-material	
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	Indicator number 8 Table #3 of Annex I				material	**Own employees**
ESRS S1-17Incidents of discrimination paragraph 103(a)	Indicator number 7 Table #3 of Annex I				non-material	
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD Guidelines paragraph 104 (a)	Indicator number 10 Table #1 and Indicator n. 14 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)		non-material	
ESRS 2- SBM3 – S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	Indicators number 12 and n. 13 Table #3 of Annex I				non-material	
ESRS S2-1 Human rights policy commitments paragraph 17	Indicator number 9 Table #3 and Indicator n. 11 Table #1 of Annex 1				non-material	
ESRS S2-1 Policies related to value chain workers paragraph 18	Indicator number 11 and n. 4 Table #3 of Annex 1				non-material	
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		non-material	
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19			Delegated Regulation (EU) 2020/1816, Annex II		non-material	
ESRS S3-1 Human rights policy commitments paragraph 16	Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1				non-material	

Disclosure Requirement and Related Datapoint	SFDR (1) Reference	Pillar 3 (2) Reference	Benchmark Regulation (3) Reference	EU Climate Law (4) Reference	Material / Non-material	Page and Paragraph Reference
ESRS S3-1 non-respect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines paragraph 17	Indicator number 10 Table #1 Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		non-material	
ESRS S3-4 Human rights issues and incidents paragraph 36	Indicator number 14 Table #3 of Annex 1				non-material	
ESRS S4-1 Policies related to consumers and end-users paragraph 16	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1				non-material	
ESRS S4-1 Non-respect of UNGPs on Businessand Human Rights and OECD guidelines paragraph 17	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		non-material	
ESRS S4-4 Human rights issues and incidents paragraph 35	Indicator number 14 Table #3 of Annex 1				non-material	
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	Indicator number 15 Table #3 of Annex 1				non-material	
ESRS G1-1 Protection of whistle-blowers paragraph 10 (d)	Indicator number 6 Table #3 of Annex 1				non-material	
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a)	Indicator number 17 Table #3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II)		non-material	
ESRS G1-4 Standards of anti- corruption and anti-bribery paragraph 24 (b)	Indicator number 16 Table #3 of Annex 1				non-material	

FINANCIAL STATEMENTS

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STATEMENT OF INCOME

for the year ending on 31 December 2025

(x EUR 1,000,000)	Note	2025	2024
Interest and similar income		5,998	7,698
Interest and similar expenses		5,751	7,450
Net interest income	1	**247**	**248**
Results from financial transactions	2	-3	-37
Other operating income		-	-
Total operating income		**244**	**211**
Employee benefits expense	3	30	28
Other administrative expenses	4	30	27
Employee benefits and other expenses		60	55
Depreciation, amortisation and value adjustments of tangible and intangible assets	5	5	5
Bank tax and resolution levy	6	19	18
Valuation adjustment of receivables and provisions for irrevocable commitments	7	1	-
Total operating expenses		**85**	**78**
Profit from ordinary operations before tax		**159**	**133**
Tax on profit from ordinary operations	8	46	39
Net profit		**113**	**94**

BALANCE SHEET

as at 31 December 2025 before profit appropriation

(x EUR 1,000,000)	Note	2025	2024
ASSETS			
Cash, cash equivalents and deposits at the Central Bank	9	1,432	6,623
Loans and advances to credit institutions	10	2,810	2,622
Loans and receivables	11	54,968	59,158
Interest-bearing securities	12	8,114	5,584
Intangible assets	13	13	11
Tangible assets	14	4	5
Other assets	15	78	14
Derivative assets	16	5,436	4,740
Income tax	23	-	-
Prepayments and accrued income	17	13	11
Total assets		**72,868**	**78,768**

(x EUR 1,000,000)	Note	2025	2024
LIABILITIES			
Debts to credit institutions	18	2,692	2,658
Funds entrusted	19	6,161	7,174
Debt securities	20	57,972	62,769
Other liabilities	21	19	20
Derivative liabilities	22	3,520	3,710
Income tax	23	3	-
Accruals and deferred income	24	9	6
Provisions	25	8	10
		70,384	76,347
Subordinated debt	26	**327**	**327**
Paid-up and called-up share capital	27	7	7
Revaluation reserves	28	-	-
Other reserves	29	2,037	1,993
Unappropriated profit for the year	30	113	94
Equity		**2,157**	**2,094**
Total liabilities		**72,868**	**78,768**
Irrevocable commitments	31	4,592	5,037

STATEMENT OF COMPREHENSIVE INCOME

for the year ending on 31 December 2025

(x EUR 1,000,000)	Note	2025	2024
Net changes in the revaluation reserves	28	-	-
Net changes in other reserves (changes in value as part of the pension provision before income tax)	29	-	-
Income tax on income and expenses recognised directly in equity		-	-
Income and expenses recognised directly in equity		**-**	**-**
Net profit		113	94
Comprehensive income		**113**	**94**

STATEMENT OF CHANGES IN EQUITY

for the year ending on 31 December 2025

(x EUR 1,000,000)	Paid-up share capital	Revaluation reserves	Other reserves	Unappropriated profit for the year	Total
As at 1 January 2024	**7**	**-**	**1,927**	**126**	**2,060**
Profit appropriation of previous year	-	-	126	-126	-
Dividend	-	-	-60	-	-60
Direct change in the value of equity	-	-	-	-	-
Profit for the year	-	-	-	94	94
As at 31 December 2024	**7**	**-**	**1,993**	**94**	**2,094**
As at 1 January 2025	**7**	**-**	**1,993**	**94**	**2,094**
Profit appropriation of previous year	-	-	94	-94	-
Dividend	-	-	-50	-	-50
Direct change in the value of equity	-	-	-	-	-
Profit for the year	-	-	-	113	113
As at 31 December 2025	**7**	**-**	**2,037**	**113**	**2,157**

STATEMENT OF CASH FLOWS

for the year ending on 31 December 2025

(x EUR 1,000,000)	Note	2025	2024
Profit before income tax		158	133
Adjusted for:			
Depreciation, amortisation and value adjustments of tangible and intangible assets		5	5
Unrealised change in the value of assets and liabilities for fair value hedge accounting		51	12
Change in loans to credit institutions and receivables not available on demand	10, 18	-109	1,444
Change in public sector loans and receivables	11	-2,079	-2,485
Change in Funds entrusted	19	-499	367
Change in other assets and liabilities		2,169	-140
Net cash flow from operating/banking activities		**-304**	**-664**
Expenses related to additions to interest-bearing securities	12	-3,555	-1,239
Income related to sale and redemptions of interest-bearing securities	12	838	795
		-2,717	**-444**
Expenses related to additions to tangible assets	14	-	-1
Income related to disposals of tangible assets	14	-	-
		-	**-1**
Expenses related to additions to intangible assets	13	-6	-4
Net cash flow from investing activities		**-2,723**	**-449**

(x EUR 1,000,000)	Note	2025	2024
Income related to long-term debt securities issued	20	10,938	9,510
Expenses related to redemption of long-term debt securities	20	-9,435	-9,476
Income related to short-term debt securities issued	20	225,291	223,629
Expenses related to redemption of short-term debt securities	20	-228,794	-223,549
Income related to borrowed long-term loans Funds entrusted	19	70	135
Expenses related to redemption long-term loans Funds entrusted	19	-131	-285
Income related to borrowed long-term loans from credit institutions	18	-	397
Expenses related to redemption long-term loans from credit institutions	18	-52	-41
		-2,113	**320**
Expenses related to dividend paid	29	-50	-60
Net cash flow from financing activities		**-2,163**	**260**
Cash flow		**-5,190**	**-853**

(x EUR 1,000,000)	2025	2024
Cash and cash equivalents as at 1 January	6,623	7,476
Cash flow	-5,190	-853
Cash and cash equivalents as at 31 December	**1,433**	**6,623**

The cash and cash equivalents include deposits at the Central Bank and the current account balance at credit institutions. In 2025, the interest paid amounted to €5,657 million (2024: €7,677 million) and the interest received amounted to €5,941 million (2024: €7,880 million). These amounts are included under 'Other assets and liabilities' in the statement of cash flows. In 2025, the income tax paid amounted to €43.7 million (2024: €47.7 million) and the bank tax paid amounted to €19.4 million (2024: €18.3 million).

GENERAL NOTES TO THE FINANCIAL STATEMENTS

COMPANY INFORMATION

The 2025 financial statements of Nederlandse Waterschapsbank N.V. (hereinafter: NWB Bank, Chamber of Commerce no. 27049562) were prepared by the Managing Board and authorised for issue by the Supervisory Board on 23 March 2026 and will be submitted for approval to the Annual General Meeting of Shareholders on 16 April 2026.

NWB Bank is a public limited liability company under Dutch law located at Rooseveltplantsoen 3, 2517 KR in The Hague, the shares of which are owned by public authorities. The bank is an essential financial service provider in the Dutch public sector and the go-to financing partner for enhancing sustainability in the Netherlands. In addition to financing water authorities, municipalities and provincial authorities, it finances other public sector bodies such as housing associations, healthcare institutions, drinking water companies, public-private partnerships and renewable energy projects.

BASIS OF PREPARATION OF THE FINANCIAL STATEMENTS

STATEMENT OF COMPLIANCE

The financial statements of NWB Bank have been prepared in accordance with the statutory requirements contained in Part 9, Book 2 of the Dutch Civil Code and the generally accepted accounting principles in the Netherlands (NL GAAP). NWB Bank has no participating interests and prepares company financial statements.

SUMMARY OF KEY ACCOUNTING POLICIES

General

The financial statements have been prepared on a historical-cost basis, except for certain interest-bearing securities and derivatives. The specific interest-bearing securities and derivatives are stated at fair value. Costs and revenue are allocated to the period in which they were incurred or earned. The financial statements are presented in millions of euros, and all amounts in the 'General notes to the financial statements' are rounded to the nearest thousand (€000), unless stated otherwise.

The names of a number of items used in the Financial Statements Formats Decree have been replaced by names that better reflect the content, according to NWB Bank.

Continuity

The financial statements have been prepared on the basis of the going concern assumption.

Recognition

An asset is recognised in the balance sheet if its future economic benefits are likely to flow to the company and the asset can be measured reliably. A debt is recognised in the balance sheet if it is likely that an outflow of resources embodying economic benefits will result from the settlement of a present obligation and the amount at which the settlement will take place can be measured reliably.

Financial assets and liabilities (except for the principal of loans) are recognised at the transaction date. This means a financial asset or financial liability is recognised in the balance sheet from the time the company is respectively entitled to the benefits or bound by the obligations arising from the contractual terms of the financial instrument. The principal of a loan is recognised at the settlement date.

Income is recognised in the statement of income when an increase in future economic benefit, which is related to an increase in an asset or a decrease in a debt, has arisen that can be measured reliably. Expenses are recognised in the statement of income when a decrease in future economic benefits related to a decrease in an asset or an increase in a debt has arisen that can be measured reliably.

Derecognition of financial assets and liabilities

An asset or debt presented in the balance sheet continues to be recognised when a transaction does not result in a significant change in the economic reality with respect to such an asset or debt. Likewise, such transactions should not be used to justify results.

A financial asset or debt (or, where applicable, part of a financial asset or part of a group of similar financial assets or liabilities) is derecognised when the transaction results in transferring to a third party all or almost all rights to receive economic rewards and all or almost all risks of the asset or debt.

Measurement

Upon initial recognition, financial assets and liabilities are stated at fair value, including or excluding, respectively, transaction costs directly attributable to the financial asset's or financial liability's acquisition or issue, except for transactions recorded at fair value and recognised through profit or loss. The transaction costs directly attributable to these balance sheet items are taken directly to profit or loss.

The fair value is the amount for which an asset can be exchanged or a liability settled between knowledgeable, independent parties who are willing to enter into a transaction. If a relevant middle rate is available, it is used as the best indication of fair value. The fair value of most of NWB Bank's financial instruments cannot be established using a relevant middle rate because there is no listing or active market. NWB Bank calculates the fair value of these other financial instruments using models.

The models use various assumptions relating to the discount rate and the timing and the size of the projected future cash flows. Option pricing models have been used to calculate the fair value of options.

After initial recognition, financial assets are classified as loans and receivables, receivables from credit institutions, interest-bearing securities or derivative assets. The loans and receivables, interest-bearing securities held to maturity, other unlisted interest-bearing securities as well as receivables from credit institutions are stated at amortised cost. Along with loans and receivables, receivables from credit institutions, other interest-bearing securities that are publicly unlisted are subsequently stated at amortised cost. Other interest-bearing securities and derivatives that are publicly listed are stated at fair value.

After initial recognition, financial liabilities are classified as debts to credit institutions, derivative liabilities, funds entrusted or debt securities. Debts to credit institutions, funds entrusted and debt securities are subsequently stated at amortised cost, and derivative liabilities are stated at fair value.

Provision for uncollectible receivables

NWB Bank makes use of the option to apply the expected loss impairment methodology of IFRS 9. This impairment model applies to all exposures held under financial assets at

amortised cost, interest-bearing securities with value changes recorded at fair value in equity, and irrevocable commitments and contracts related to financial guarantees.

Under IFRS 9, these exposures are classified into three groups based on the different stages of credit risk.

Stage 1 includes exposures that show no significant change in credit risk since their initial recognition. A 12-month expected credit loss is recognised for this group, i.e. the expected credit loss based on the probability of default within 12 months of the reporting date.

Stage 2 includes exposures that show a significant increase in credit risk since initial recognition but have not yet defaulted. A lifetime expected credit loss is recognised for these exposures, taking into account any guarantees and received collateral. This concerns the expected shortfalls on the contractual cash flows for the remaining duration of the exposure, discounted at the effective interest rate.

Stage 3 includes exposures that are credit-impaired. A lifetime expected credit loss is recognised for these exposures, taking into account any guarantees and received collateral.

Due to exposures included in interest-bearing securities, the bank applies low credit risk exemption available under IFRS 9 to instruments that fall in the category of investment grade.

Hedge accounting

The bank uses financial instruments to hedge most interest rate and foreign exchange risks related to financial assets and liabilities. In terms of market value, value changes due to interest rate and foreign exchange fluctuations are offset. Under hedge accounting, the recognition of a hedging instrument and the accompanying hedged position can be synchronised insofar as the hedging is effective. Hedge accounting is only permitted if adequate documentation is in place and the requisite hedge effectiveness has been demonstrated. NWB Bank only uses derivatives as hedging instruments, and these are stated at fair value in the balance sheet. Together with the value changes in the hedged position related to the covered risk, value changes in the derivatives that are part of the fair value hedge are recorded in profit or loss as results from financial transactions.

NWB Bank applies two types of fair value hedge accounting: micro-hedging and macro-hedging. Micro-hedging relates to individual transactions that are included in an economic hedge relationship covering interest rate and foreign exchange risks. It involves a one-on-one relationship between the hedged instrument and the hedged item. Macro-hedging relates to a group of transactions that is hedged, for interest rate risk purposes, by using a group of derivative financial instruments. While there is not always a one-on-one relationship between the hedged item and the hedging instrument at an individual level, it is demonstrated at a portfolio level that the derivative financial instruments in question offset the fair value changes of the assets in question, respectively, caused by interest rate fluctuations.

Foreign currencies

Monetary assets and liabilities in foreign currencies are stated as euros at the middle rates at the balance sheet date (published by the ECB). The use of middle rates is consistent with NWB Bank's policy, which states that all foreign currency positions are hedged individually, effectively causing day-to-day flows of foreign currency funds to be virtually nil.

The balance of gains or losses arising from transactions in foreign currencies are translated at the rates prevailing on the transaction date. All currency translation differences of monetary assets and liabilities are recognised in profit or loss.

Currency swaps are used to hedge foreign exchange exposures on loans receivable and payable. These currency swaps are stated at the instrument's fair value as of the balance sheet date. The changes in value are recorded under 'Results from financial transactions'.

Cash, cash equivalents and deposits at the Central Bank

Cash, cash equivalents and deposits at the Central Bank are stated at amortised cost based on the effective interest method less a potential provision for uncollectibility.

Loans and receivables, and receivables from credit institutions

Loans and receivables, and receivables from credit institutions are stated at amortised cost using the effective interest method, less a potential provision for uncollectible receivables.

Interest-bearing securities

Interest-bearing securities are primarily intended to be held for an indefinite period and may be sold to meet liquidity requirements or in response to changes in the issuer's risk profile. The interest-bearing securities are initially stated at fair value. For subsequent measurement, interest-bearing securities can be divided into the following two categories.

Interest-bearing securities held to maturity

Interest-bearing securities purchased with fixed or determinable payments, of which NWB Bank firmly intends to hold to maturity, and in respect of which it has the contractual and economic ability to do so, are stated at amortised cost using the effective interest method reduced by a potential provision for uncollectibility.

Other interest-bearing securities

Other unlisted interest-bearing securities are stated in line with the securities 'held to maturity'.

Other listed interest-bearing securities are stated at fair value. As long as the value change of an individual interest-bearing security is positive, it is recorded directly in equity until the time of realisation. Once the interest-bearing security in question is derecognised, the cumulative unrealised gain or loss on an individual asset that was recorded directly in equity is taken to profit or loss. Any cumulative decrease in value below cost is immediately taken to profit or loss. Any subsequent unrealised increase in value of the relevant interest-bearing security is taken to profit or loss if it is below amortised cost. Any increase in value above amortised cost is recorded in equity.

If interest-bearing securities are included in a fair value hedge relationship, the effective part of the hedge is recognised in profit and loss rather than equity.

Intangible assets

This item includes costs and expenditures related to computer software. After initial recognition, the intangible asset is recognised at cost less any accumulated amortisation and impairments. The useful life is considered to be five years, and amortisation is straight-line over the useful life. The amortisation period and amortisation method will be reviewed if there is cause to do so.

Tangible assets

Tangible fixed assets consist of property and equipment. Property and equipment are stated at acquisition price net of straight-line depreciation. Depreciation of these assets is recognised in profit or loss over a given period, which corresponds with the expected useful lives of the assets concerned.

The annual depreciation rates are as follows:

Building	2.5%
Fixtures and installations	10%
Equipment, furniture and fittings, etc.:	
• furniture and fittings	10%
• office equipment	20%
Computer equipment	20%
Cars	20%

Land is not depreciated.

An asset's residual value, useful life and measurement methods are reviewed and adjusted, if appropriate, on an annual basis.

Derivates

A derivative is a financial instrument with the following three characteristics:

- The value changes as a result of changes in market factors, such as a certain interest rate, the price of a financial instrument, exchange rates, creditworthiness or other variables (the underlying value).
- No net initial investment, or only a minor net initial investment, is required compared with other types of contracts that respond similarly to changes in the market factors mentioned.
- It is settled at a future date.

Derivatives are initially recognised at fair value on the date on which a derivative contract is entered into. Any discrepancies between a financial instrument's fair value and the value under the bank's measurement models are amortised over the instrument's term. Derivatives are subsequently remeasured at fair value, including accrued interest.

Derivatives are carried as assets when their fair value is positive and as liabilities when their fair value is negative. Any gains or losses arising from changes in fair value on derivatives are recognised in profit or loss under the item results from financial transactions. Generally accepted measurement models are applied, based on the most appropriate valuation curves, including the €STR-curve. A credit valuation adjustment and a debt valuation adjustment are also included in the measurement.

Embedded derivatives are measured separately if they meet the following characteristics.

- There is no close relationship between the economic characteristics and risks of the embedded derivative and those of the host contract.
- The host contract is not carried at fair value through profit or loss.
- A separate instrument having the same characteristics would be classified as a derivative.

Derivatives meeting these conditions are included in the balance sheet under the host contracts to which they belong and carried at fair value, with changes in value being taken to profit or loss. Contracts are assessed only when the transaction is

effected, unless the terms of a contract change such that expected cash flows are significantly impacted.

Debts to credit institutions, funds entrusted, debt securities and subordinated debt

All loans under debts to credit institutions, funds entrusted, debt securities and subordinated debt are initially recognised at the fair value of the consideration received, less directly attributable transaction costs. After initial recognition, interest-bearing loans are subsequently stated at amortised cost using the effective interest method. Gains and losses are recognised in net interest income when the liabilities are derecognised.

Employee benefits and defined benefit plan obligations

Pursuant to Dutch Accounting Standard 271 on Employee Benefits, NWB Bank applies the IFRS-EU standard on pensions and other post-retirement benefits (IAS 19) in full.

From 1 January 2020, active employees became part of a defined contribution plan. The pension plan for inactive employees concerns a defined benefit plan funded by premiums paid to an insurance company based on regular actuarial calculations.

A defined contribution pension plan is a scheme in which the employee's pension contribution (rather than the payment) is defined. The provision for defined benefit plans is the present value of the pension liabilities at the balance sheet date less the fair value of the plan assets. The defined benefit plan obligations are calculated annually by an independent actuary using the projected unit credit method.

Netting of financial assets and financial liabilities

A financial asset and a financial liability are offset and reported on a net basis if there is a legally enforceable right to offset the recognised amounts and if there is an intention either to settle on a net basis or to realise the asset and settle the liability simultaneously.

Revenue recognition

Revenue is recognised if it is probable that the economic benefits will flow to NWB Bank and the revenue can be reliably measured.

Net interest income

Interest income and expenses are recognised in the income statement using the effective interest method. The application of this method includes the amortisation of any discount or premium or other differences (including transaction costs and applicable commissions) between the initial carrying amount of an interest-bearing instrument and the amount at maturity, based on the effective interest method.

Income tax

Income tax is recognised as an expense at the same time as profit. Deferred tax assets and deferred tax liabilities are stated on an undiscounted basis.

Current tax assets and liabilities

Current tax assets and liabilities for the current and prior periods are stated at the amount expected to be recovered from or paid to the Dutch Tax and Customs Administration. The tax payable is calculated on the basis of current tax rates and tax laws.

Deferred tax assets and liabilities

Deferred tax assets are recognised for all deductible temporary differences, carry-forward of unused tax credits and unused tax losses, if it is probable that taxable profit is available against which the deductible temporary differences can be offset, and the deductible temporary differences, carry-forward of unused tax credits and unused tax losses can be utilised.

The carrying amount of deferred tax assets is reviewed at each balance sheet date and reduced to the extent that it is no longer probable that sufficient taxable profit will be available to allow all or part of the deferred tax asset to be utilised. Unrecognised deferred tax assets are reassessed at each balance sheet date and recognised to the extent that it has become probable that future taxable profit will allow the deferred tax asset to be recovered.

Deferred tax assets and liabilities are measured at the tax rates that are expected to apply to the year when the asset is realised or the liability is settled, based on current tax rates and tax laws.

Deferred tax assets and liabilities are netted if a right to offset them exists.

Basis for preparation of the statement of cash flows

The statement of cash flows is presented in accordance with the indirect method, distinguishing between the cash flows from operating/banking, investing and financing activities.

Cash and cash equivalents represent assets that can be converted into cash without restriction, including the cash available as well as balances payable on demand at banks and central banks.

The changes in loans and receivables, funds entrusted and those based on receivables from credit institutions and Debts to credit institutions are stated under cash flows from operating/banking activities, given the nature of the operations.

Investing activities include the purchase and sale and settlement of interest-bearing securities, as well as the purchase and sale of property and equipment. Long-term loans (terms > 1 year) and short-term loans (terms < 1 year) taken out and repaid are classified as a financing activity.

Segmented information

As the bank's organisation is not geared towards operations in different sectors, NWB Bank does not distinguish between operating segments in its assessment and decision-making about returns and the allocation of resources. Accordingly, no segment information is disclosed in these financial statements.

Significant assumptions and estimation uncertainties

The preparation of the financial statements requires the Managing Board to form opinions and make estimates and assumptions that have an impact on the application of accounting policies and the reported value of assets and liabilities and of income and expenses. The estimates and associated assumptions are based on past experience, market information and various other factors considered to be reasonable given the circumstances. The outcomes form the basis for the opinion on most of the carrying amounts of NWB Bank's assets and liabilities that cannot be easily established from other sources. The actual outcomes may differ from these estimates.

The estimates and underlying assumptions are reviewed regularly. Revisions of estimates are recognised in the period in which the estimate was revised if the revision

only has consequences for that period, or in both the reporting period and future periods if the revision also has consequences for future periods.

Opinions formed by the Managing Board that could have a significant impact on the financial statements, and estimates containing a substantial risk of a material adjustment in a subsequent financial year, relate primarily to the measurement of financial assets and financial liabilities stated at fair value, especially to the measurement of derivatives, as well as impairments when applying the expected loss impairment methodology of IFRS 9.

NOTES ON THE STATEMENT OF INCOME

1 NET INTEREST INCOME

(x EUR 1,000)	2025	2024
Interest income on cash, cash equivalents and deposits at the Central Bank, credit institutions and on loans and receivables at amortised cost	2,196,975	2,725,753
Interest income on interest-bearing securities	146,479	97,849
Derivatives	3,651,765	4,872,621
Commission	3,113	2,202
Negative interest expense	-	-
Interest income	**5,998,332**	**7,698,425**
Interest expense on credit institutions, funds entrusted, hybrid capital and debt securities at amortised cost	1,838,405	2,209,248
Derivatives	3,910,663	5,238,027
Negative interest income	2,414	3,070
Interest expense	**5,751,482**	**7,450,345**
Net interest income	**246,850**	**248,080**

Interest income consists of interest income on loans and receivables, interest-bearing securities, cash, cash equivalents, and deposits at the Central Bank, as well as interest-like commission, fees received for the early redemption of financial instruments to which no hedge accounting is applied, premiums, and discounts. Premiums and discounts on loans and receivables not stated at fair value are recognised using the effective interest method, together with the relevant interest income.

Interest expense consists of interest expenses on liabilities, whether or not embodied in debt securities, and derivatives, as well as interest-like commission, fees paid for early redemption, premiums and discounts. Premiums and discounts on debts, whether or not embodied in debt securities, not stated at fair value are recognised using the effective interest method, together with the relevant interest expense.

The decrease in interest income and expenses in 2025 compared with 2024 is related to the fall in market interest rates. Although growth in the loan portfolio led to higher interest income, net interest income was slightly lower than the previous year because the costs of short-term funding through commercial paper issuance increased. Market interest rates, which fluctuated significantly again over the past year, only have a very limited impact on our net interest income. This is because we carefully hedge our interest rate risk. Consequently, the interest rate we charge our clients fluctuates in line with the rate we pay for long-term funding. The increase in interest income on interest-bearing securities is mainly due to new investments.

Negative interest income concerns the negative interest on financial assets: cash and cash equivalents and deposits at the Central Bank, receivable from credit institutions, and loans and receivables. Negative interest expense concerns the negative interest on financial liabilities, debts to credit institutions, funds entrusted and debt securities.

2 RESULTS FROM FINANCIAL TRANSACTIONS

NWB Bank applies two types of fair value hedge accounting: micro-hedging and macro-hedging. Micro-hedging relates to individual transactions that are included in an economic hedge relationship covering interest rate and foreign exchange risks. It involves a one-on-one relationship between the hedged instrument and the hedged item. Macro-hedging relates to a group of transactions that is hedged, for interest rate risk purposes, by using a group of derivative financial instruments. While there is not always a one-on-one relationship between the hedged item and the hedging instrument at an individual level, it is demonstrated at a portfolio level that the derivative financial instruments in question offset the fair value changes caused by interest rate fluctuations.

The results from financial transactions can be broken down as follows:

(x EUR 1,000)	2025	2024
Changes in the fair value of derivatives included in macro-hedge accounting	6,262,982	-1,382,364
Revaluation of financial assets and liabilities included in macro-hedge accounting	-6,256,253	1,382,361
Macro hedge accounting ineffectiveness	**6,729**	**-3**
Micro-hedge accounting ineffectiveness	2,541	-2,935
Total hedge accounting ineffectiveness	**9,270**	**-2,938**
Other changes in the fair value of restructured derivatives included in hedge accounting	-31,088	-33,021
Changes in the fair value of derivatives not included in hedge accounting	2,157	175
Change in counterparty credit risk (CVA/DVA)	1,408	2,944
Results from maturity extensions and early redemptions	332	98
Unrealized credit result on interest–bearing securities	11,869	-5,141
Other fair value changes	3,274	1,235
Total	**-2,778**	**-36,648**

The bank invests in NHG RMBS. The interest rate risk on these investments is hedged to the greatest extent possible by interest rate derivatives. The interest rate risk on these investments is hedged as much as possible using interest rate derivatives. The bank uses fair value hedge accounting for this purpose. The result of this is included under the item 'Macro-hedge accounting ineffectiveness'.

The other changes in the fair value of restructured derivatives included in hedge accounting were due to the restructuring of the derivatives portfolio on several occasions in the past with a view on managing the interest rate risk position. As a result, the restructuring of the derivatives portfolio had a favourable effect on net interest income (due to lower interest expenses).

The item changes in the fair value of derivatives not included in hedge accounting concerns changes in the market value of derivatives entered into for asset and liability management purposes that are not part of a micro- or macro-hedge relationship.

The change in counterparty credit risk (CVA/DVA) mainly relates to an exposure of €80 million (2024: €120 million) to one financial counterparty that is not covered by collateral, arising from concluded derivatives contracts and the related collateral agreement. The volatility of the financial result for this item is particularly sensitive to movements in the credit default swap (CDS) spread for this specific counterparty, with which no new transactions have been entered into for a long time.

The result on maturity extensions and prepayments relates to adjustments to loans at the request of clients.

The unrealised credit result on interest-bearing securities relates to the unrealised result on listed interest-bearing securities measured at fair value.

The other fair value changes include changes in the fair value of financial instruments after the moment of purchase or sale, and entering into or terminating the hedge relationship, premiums and fees received and paid upon the settlement of derivative contracts, realised revaluation gains on the sale of interest-bearing securities and commissions.

NWB Bank borrows significant amounts in foreign currencies. The associated currency risks are hedged immediately and fully through currency swaps. As a result, the currency risk incurred by NWB Bank is nil.

3 EMPLOYEE BENEFIT EXPENSES

The number of employees expressed in full-time equivalents (FTEs), including the Managing Board, totalled 166.6 at year-end 2025 (2024: 141.7). Of these, 3 are statutory members of the Managing Board, 15 are managers and 151.6 are staff members (2024: 4 statutory members of the Managing Board, 13 managers and 124.7 staff members). The average number of FTEs (including the Managing Board) was 154.1 (2024: 134.4) and all staff members work in the Netherlands.

(x EUR 1,000)	**2025**	2024
Wages and salaries	18,004	15,519
Pension costs	3,287	2,765
Other social security costs	2,243	1,689
Other staff costs	6,227	8,141
Total	**29,761**	**28,114**

The increase in salary costs is due to both staff growth and the collective labour agreement wage increase. Other personnel expenses decreased because vacancies that were previously filled with temporary staff have now been filled with permanent employees.

The remuneration of the statutory Managing Board members, including regular pension costs and other specific elements as shown in the table below, amounted to €1,971 thousand in 2025 (2024: €1,416 thousand).

(x EUR 1,000)	Fixed remuneration	Pension contribution	Other
2025			
Lidwin van Velden	345	53	94
Frenk van der Vliet	298	48	297
Ard van Eijl	293	46	50
Wilma Schouten	168	22	257
Total	**1,104**	**169**	**698**
2024			
Lidwin van Velden	320	52	84
Frenk van der Vliet	286	48	61
Ard van Eijl	272	45	50
Wilma Schouten	159	22	17
Total	**1,037**	**167**	**212**

The fixed remuneration comprises the fixed salary for 13 months, as well as an 8% holiday allowance and an extra allowance of 11.1%.

The remaining benefits recorded under 'other' are specified as follows (in €):

Wilma Schouten stepped down as CFO as of 1 August 2025 and received compensation of €153,000 for the remainder of the year. In addition, she received compensationt of €85,000 upon her departure. Frenk van der Vliet stepped down as CCO as of 31 December 2025 and received compensation of €232,000.

An expense allowance: the taxed expense allowance amounted to €3,000 for Lidwin van Velden, €3,000 for Frenk van der Vliet, €2,000 for Wilma Schouten and €3,000 for Ard van

Eijl (2024: €3,000 for Lidwin van Velden, Frenk van der Vliet and Ard van Eijl, €2,000 for Wilma Schouten).

A staff mortgage loan discount plan: in 2025, this taxed allowance amounted to nil for Lidwin van Velden, nil for Frenk van der Vliet, €3,000 for Wilma Schouten and nil for Ard van Eijl (2024: €3,000 for Lidwin van Velden, nil for Frenk van der Vliet, €3,000 for Wilma Schouten and €4,000 for Ard van Eijl).

A contribution for the pensionable income ceiling: in 2025, this taxed allowance amounted to €45,000 for Lidwin van Velden, €29,000 for Frenk van der Vliet, €14,000 for Wilma Schouten and €24,000 for Ard van Eijl (2024: €34,000 for Lidwin van Velden, €27,000 for Frenk van der Vliet, €12,000 for Wilma Schouten and €20,000 for Ard van Eijl). This employer contribution above the €137,800 cap (2024: €137,800) is based on an age-dependent, graduated scale for pensionable earnings. A 3% employee contribution is deducted from this.

Compensation for the harmonisation of the net pensions scheme as of 2015: in 2025, this taxed allowance amounted to €11,000 for Lidwin van Velden, €13,000 for Frenk van der Vliet, nil for Wilma Schouten and €4,000 for Ard van Eijl (2024: €10,000 for Lidwin van Velden, €12,000 for Frenk van der Vliet, nil for Wilma Schouten and €3,000 for Ard van Eijl).

Compensation has been allocated for non-contributory entitlements determined as at 31 December 2019. In 2025, this amounted to €16,000 for Lidwin van Velden, €9,000 for Frenk van der Vliet, nil for Wilma Schouten and €8,000 for Ard van Eijl (2024: €15,000 for Lidwin van Velden, €9,000 for Frenk van der Vliet, nil for Wilma Schouten and €7,000 for Ard van Eijl).

The flat-rate contribution for the car provided by the bank is based on the additional tax liability and amounts to €19,000 for Lidwin van Velden, €11,000 for Frenk van der Vliet and nil for Wilma Schouten (2024: €18,000 for Lidwin van Velden, €11,000 for Frenk van der Vliet and nil for Wilma Schouten). Ard van Eijl received a monetary contribution from the car scheme of €12,000 (2024: €12,000).

4 OTHER ADMINISTRATIVE EXPENSES

Other administrative expenses includes regulation and consultancy, accommodation, and office and general expenses. The administrative expenses can be broken down as follows:

	2025	2024
(x EUR 1,000)		
Consultancy and regulatory fees	13,798	12,827
Information and communication	8,509	8,345
Other costs	8,730	6,342
Total	**31,037**	**27,514**

The increase in other administrative expenses is partly due to the further growth of the organisation. This includes, among other things, additional capacity for IT management and the expansion of data analytics and data management. In addition, we called on external advisers for various projects. The item also includes a contribution of €3.0 million to the NWB Water Innovation Fund (2024: €1.7 million).

The remuneration of 7 Supervisory Board members (2024: 7) included in other expenses amounted to €256,000 (2024: €237,000).

Remuneration of the Supervisory Board members

(x EUR 1,000)	2025	2024
Joanne Kellermann	52	48
André ten Damme	34	32
Geert Embrechts	34	20
Toon van der Klugt	34	32
Frida van den Maagdenberg	9	32
Caroline Oosterloo	34	32
Annette Ottolini	34	32
Maarten Otto	25	
Manfred Schepers		9
Total	**256**	**237**

The above amounts include expense allowances but not travel reimbursement.

Auditor's fees

In the financial year, the following fees were recognised, as covered in Section 382a of Book 2 of the Dutch Civil Code. The costs of auditing the financial statements relate to the relevant financial year. The amounts stated include VAT.

(x EUR 1,000)	2025	2024
Audit and regulatory fees	512	437
Other costs	1,056	881
Total	**1,568**	**1,318**

The auditor's costs relate to the relevant financial year regardless of whether the procedures were performed by the external auditor and the audit firm during the financial year. In addition to the statutory audit, the auditor performs several other assurance services. Those services comprise a review of interim financial information, a review of non-financial information as set out in this annual report and the procedures involved in reporting to the supervisory authority. Moreover, additional activities were included in the other audit engagements for the audit of specific projects. The increase in costs in 2025 compared with 2024 is due to additional work on both the financial statements and other audit engagements.

5 DEPRECIATION

Depreciation consists of depreciation of the office building, fixtures and installations, installation costs, furniture and fittings, computer equipment and cars as disclosed in the note to the item tangible assets. The amortisation of intangible assets is also included in this item.

6 BANK TAX AND RESOLUTION LEVY

NWB Bank is liable for bank tax. The amounts for 2025 and 2024 are based on the balance sheet at year-end 2024 and 2023, respectively, and are charged to the profit for 2025 and 2024, respectively.

Bank tax is based on the ratio of current liabilities at the end of the previous financial year amounting to €20,113 million (2024: €18,865 million) and long-term liabilities for the previous financial year amounting to €56,561 million (2024: €54,984 million). In 2025, €19.4 million was paid in bank tax (2024: €18.3 million). This amount is higher than in 2024 due to an increase in both long-term and short-term liabilities. The rate for the 2025 financial year remained unchanged from the rate for the 2024 financial year (5.8 basis points for long-term liabilities and 2.9 basis points for short-term liabilities).

Under the Bank Recovery and Resolution Directive (BRRD), the bank is required to pay a resolution levy. On 10 February 2025, the Single Resolution Board announced that no levy is expected for 2025, as the target level of the Single Resolution Fund has been reached. There was no levy in 2024 either, for the same reason.

The cumulative resolution levy up to and including 2025 was €9.2 million (2024: €9.2 million), paid in the form of irrevocable payment commitments. These amounts were charged to the profit in the respective years to which they relate.

7 VALUATION ADJUSTMENT OF RECEIVABLES AND PROVISIONS FOR IRREVOCABLE COMMITMENTS

NWB Bank uses the option to apply the expected loss impairment methodology of IFRS 9. This item can be summarised as follows:

(x EUR 1,000)	2025	2024
Loans and receivables	-589	-142
Interest-bearing securities	-21	6
Total	**-610**	**-136**

A detailed explanation of the Expected Credit Loss can be found in note 32.

8 INCOME TAX EXPENSE

(x EUR 1,000)	2025	2024
Profit before income tax	158,429	132,625
Income tax at 25.8% resp. 25.8%	40,875	34,217
Non-deductible expenses relating to bank tax	5,003	4,713
Adjustments for previous financial years	-	-1
Other non-deductible expenses and adjustments	5	2
Income tax expense	**45,883**	**38,931**
Effective tax burden (%)	29.0%	29.4%

The income tax burden can be broken down into current tax and deferred tax as follows:

(x EUR 1,000)	2025	2024
Current tax	**47,326**	**40,436**
Changes previous years	-	-1
Change in provision for pensions	25	22
Results from 'basisrentelening' loans deferred for tax purposes	-811	-811
Results from maturity extensions deferred for tax purposes previous years	-657	-715
Deferred tax	**-1,443**	**-1,504**
Income tax expense	**45,883**	**38,931**

There is a minimum capital requirement for banks ('thin cap rule'). This thin cap rule limits the interest deduction for corporate income tax if the leverage ratio is lower than 10.6% (2024: 10.6%). For both the 2025 and 2024 financial years, the leverage ratio for the calculation of the thin cap rule exceeded 10.6% (10.6% respectively) and therefore the charge on account of this is nil.

Mainly due to the non-deductibility of the bank tax, the effective tax rate is higher than the nominal rate of 25.8%.

NWB Bank has no foreign establishments or participations and is not part of a consolidated group. Therefore, NWB Bank does not fall within the scope of international tax legislation such as the Minimum Tax Act 2024 (also known as Pillar 2).

NOTES ON THE BALANCE SHEET

9 CASH, CASH EQUIVALENTS AND DEPOSITS AT THE CENTRAL BANK

Cash, cash equivalents and deposits at the Central Bank consists of legal tender and on-demand and other balances at the Dutch Central Bank (De Nederlandsche Bank – DNB) and the European Central Bank (ECB).

10 RECEIVABLES FROM CREDIT INSTITUTIONS

Receivables from credit institutions mainly comprises collateral held under collateral arrangements related to derivative contracts, which is not at the bank's disposal.

This item can be broken down as follows:

	2025	2024
(x EUR 1,000)		
Balances payable on demand	586	426
Receivables under collateral arrangements	2,727,995	2,517,429
Receivables guaranteed by the Dutch government	81,521	104,486
Total	**2,810,102**	**2,622,341**

11 LOANS AND RECEIVABLES

This item consists of loans and receivables, other than interest-bearing securities, from clients other than credit institutions. The receivables, almost all of which relate to the Dutch public sector, are mostly long-term. Public sector loans and receivables are understood to include those to or guaranteed by Dutch public authorities, and to government-controlled public limited liability companies and other businesses or institutions with delegated government duties.

The movements in loans and receivables are shown below:

	2025	2024
(x EUR 1,000)		
As at 1 January	**59,157,970**	**55,263,557**
Newly granted long-term loans	9,858,794	10,218,714
Newly granted short-term loans	4,259,563	2,221,579
Redemptions	-12,048,862	-9,984,460
Value adjustment for fair value hedge accounting	-6,258,779	1,438,722
Expected credit loss	-589	-142
As at 31 December	**54,968,097**	**59,157,970**

Breakdown of loans and receivables according to the nature of the receivable:

	2025	2024
(x EUR 1,000)		
Receivables from or under guarantee by the Dutch government	56,873,551	54,692,729
Non-guaranteed receivables to the public sector and others	3,764,024	3,875,351
Receivables under collateral arrangements	-	-
Value adjustment for fair value hedge accounting	-5,668,306	590,473
Expected credit loss	-1,172	-583
Total	**54,968,097**	**59,157,970**

Non-guaranteed receivables to the public sector concern receivables from the drinking water companies, grid operators, public-private partnership projects and renewable energy projects.

Receivables from or guaranteed by the Dutch government can be broken down as follows:

(x EUR 1,000)	2025	2024
Water authorities	9,189,749	9,207,136
Municipalities	4,740,791	4,513,997
Social housing	39,086,489	37,001,061
Other	3,856,522	3,970,535
Total	**56,873,551**	**54,692,729**

A provision for uncollectibility is determined based on the Expected Credit Loss method of IFRS 9. This is explained in more detail in the 'Expected Credit Loss' section.

The collateral value of the portion of the loans and receivables portfolio contributed as collateral to DNB amounted to €15.1 billion at year-end 2025 (€13.4 billion at year-end 2024).

Of the loans and receivables, a nominal €1.6 billion has a remaining term to maturity of fewer than 12 months (2024: €1.1 billion).

In 2022, the bank began providing sustainability-linked loans (SLLs) to clients. In 2025, this portfolio was further expanded. The interest rate on these loans partly depends on achieving sustainability targets (KPIs) by clients. As of the reporting date, an assessment has been made of the extent to which these KPIs will be achieved and the amount involved. The carrying amount of these loans is €270.0 million (2024: €113.0 million).

12 INTEREST-BEARING SECURITIES

Interest-bearing securities can be broken down as follows:

(x EUR 1,000)	2025	2024
Interest-bearing securities held to maturity	2,218,357	-
Other listed interest-bearing securities	978,079	862,327
Other unlisted interest-bearing securities	4,917,687	4,721,260
Total	**8,114,123**	**5,583,587**

The movements in interest-bearing securities in 2025 and 2024 were as follows:

(x EUR 1,000)	Public sector bodies	Other	Total
As at 1 January 2025	**1,984,416**	**3,599,171**	**5,583,587**
Purchases	1,889,500	1,665,499	3,554,999
Sales and redemptions	-449,784	-387,920	-837,704
Value adjustments in Other interest-bearing securities	-114,449	-72,289	-186,738
Expected credit loss	-	-21	-21
As at 31 December 2025	**3,309,683**	**4,804,440**	**8,114,123**
As at 1 January 2024	**1,729,317**	**3,302,759**	**5,032,076**
Purchases	425,000	813,801	1,238,801
Sales and redemptions	-222,284	-572,559	-794,843
Value adjustments in Other interest-bearing securities	52,383	55,164	107,547
Expected credit loss	-	6	6
As at 31 December 2024	**1,984,416**	**3,599,171**	**5,583,587**

In 2025, the bank expanded its 'Interest-bearing securities held to maturity' portfolio due to an expected increase in the need for collateral, as well as rising costs associated with holding liquid assets.

Part of the interest-bearing securities is the investment in NHG RMBS (Residential Mortgage-Backed Securities), in line with the second pillar of its strategy as a 'Financing partner to enhance sustainability in the Netherlands'. The underlying mortgages are designed to finance sustainable housing at significantly reduced rates. NWB Bank thus aims to contribute to the affordability and sustainability of owner-occupied homes with a National Mortgage Guarantee. The nominal €3,288 million (31 December 2024: €2,864 million) in total investment is included in the item 'Other unlisted interest-bearing securities'.

A provision for uncollectibility has been implemented based on the Expected Credit Loss methodology of IFRS 9. A further explanation is given in the 'Expected Credit Loss' section.

At the end of 2025, an amount of nil (2024: €30.8 million) in interest-bearing securities was pledged to DNB as collateral.

Of the interest-bearing securities, a nominal €99 million (2024: €263 million) has a remaining term to maturity of less than 12 months.

13 INTANGIBLE ASSETS

Intangible assets comprises capitalised expenses related to computer software. The breakdown of this item in 2025 and 2024 is as follows.

(x EUR 1,000)	2025	2024
Carrying amount as at 1 January	**10,736**	**10,055**
Additions	5,924	4,381
Amortisation	-3,974	-3,700
Carrying amount as at 31 December	**12,686**	**10,736**

The cumulative amounts as of 31 December were as follows:

(x EUR 1,000)	2025	2024
Additions	40,694	34,770
Amortisation	-28,008	-24,034
Carrying amount as at 31 December	**12,686**	**10,736**

14 TANGIBLE ASSETS

Tangible assets comprises capitalised expenses related to the office building and other equipment. Other equipment consists mainly of furniture and fittings, computer equipment and company cars.

The specification of this item's movements in 2025 and 2024 is as follows:

(x EUR 1,000)	Property in use by the bank	Other equipment	Total
Carrying amount as at 1 January 2025	**3,427**	**1,285**	**4,712**
Additions 2025	24	308	332
Disposals 2025	-	-	-
Depreciation in 2025	-336	-544	-880
Carrying amount as at 31 December 2025	**3,115**	**1,049**	**4,164**
Carrying amount as at 1 January 2024	**3,839**	**1,325**	**5,164**
Additions 2024	11	704	715
Disposals 2024	-	-90	-90
Depreciation in 2024	-423	-654	-1,077
Carrying amount as at 31 December 2024	**3,427**	**1,285**	**4,712**

The cumulative amounts at the end of 2025 were as follows:

(x EUR 1,000)	Property in use by the bank	Other equipment	Total
Additions	12,763	12,856	25,619
Depreciation	-9,648	-11,807	-21,455
Carrying amount as at 31 December 2025	**3,115**	**1,049**	**4,164**

The cumulative amounts at the end of 2024 were as follows:

(x EUR 1,000)	Property in use by the bank	Other equipment	Total
Additions	12,739	12,548	25,287
Depreciation	-9,312	-11,263	-20,575
Carrying amount as at 31 December 2024	**3,427**	**1,285**	**4,712**

15 OTHER ASSETS

Other assets mainly relates to amounts receivable and amounts to be settled, respectively, in connection with interest and repayments and payment transactions around the balance sheet date.

16 DERIVATIVES

Derivative assets comprises interest rate swaps and currency swaps, caps, floors, and swaptions. These products are carried at fair value, including accrued interest. Generally accepted valuation models are applied, based on the most appropriate valuation curves, including the OIS and €STR curves, which at year-end 2025 were at a higher level compared to year-end 2024. In the 2025 breakdown of derivatives below, derivatives totalling €312,071 (2024: €243,671) were not included in hedge accounting.

Breakdown by remaining term to maturity of fair values as at 31 December 2025 and 2024, respectively:

(x EUR 1,000)	<3 months	3-12 months	1-5 years	>5 years	Total
2025					
Interest rate swaps	89	1,227	34,889	4,884,913	4,921,118
Currency swaps	-	-	357,962	51,140	409,102
Caps, floors and swaptions	42	-	508	105,204	105,754
Total 2025	**131**	**1,227**	**393,359**	**5,041,257**	**5,435,974**
2024					
Interest rate swaps	106	1,100	39,656	3,219,077	3,259,939
Currency swaps	269,881	274,514	575,263	141,200	1,260,858
Caps, floors and swaptions	-	-	579	218,870	219,449
Total 2024	**269,987**	**275,614**	**615,498**	**3,579,147**	**4,740,246**

17 PREPAYMENTS AND ACCRUED INCOME

Prepayments and accrued income comprises prepaid amounts for costs related to the next accounting period(s). This item also comprises the unbilled amounts to be received regarding income recognised in the current or previous accounting period(s). Finally, this item includes collateral deposited with the Single Resolution Board (SRB) in the form of irrevocable payment commitments (IPCs) in the amount of €9.2 million (2024: €9.2 million).

18 DEBTS TO CREDIT INSTITUTIONS

Debts to credit institutions comprises liabilities, other than embedded debt securities, due to credit institutions. This item can be broken down as follows:

(x EUR 1,000)	2025	2024
Debts to credit institutions short term	571,921	600,000
Liabilities under collateral arrangements	1,067,790	914,190
Exposure central clearing	6,114	11,369
Accrued interest	3,711	5,168
Carrying amount Debts to credit institutions short term	**1,649,536**	**1,530,727**
Debts to credit institutions long term	1,137,880	1,190,243
Value adjustment for fair value hedge accounting	-100,539	-68,057
Accrued interest and premium/discount	5,179	5,434
Carrying amount Debts to credit institutions long term	**1,042,520**	**1,127,620**
Carrying amount as at 31 December	**2,692,056**	**2,658,347**
Movement in Debts to credit institutions long term		
As at 1 January	1,190,243	834,431
Loans taken out at credit institutions	-	397,305
Redemptions and currency revaluations	-52,363	-41,493
As at 31 December	**1,137,880**	**1,190,243**

The collateral included in this item concerns collateral held under collateral arrangements related to derivative contracts. Of the long-term debt to credit institutions, a nominal amount of nil (2024: €0.5 million) has a remaining maturity of less than 12 months.

The Exposure Central Clearing item comprises the balance of the daily offset of the derivatives against the collateral received or paid with central counterparties.

19 FUNDS ENTRUSTED

Funds entrusted consists of liabilities due to parties other than credit institutions, including 'Namensschuldverschreibungen' and 'Schuldscheine'.

This item can be broken down as follows:

	2025	2024
(x EUR 1,000)		
Funds entrusted short term	718,271	788,107
Liabilities under collateral arrangements	1,207,710	1,658,407
Accrued interest	3,636	5,545
Carrying amount Funds entrusted short term	**1,929,617**	**2,452,059**
Funds entrusted long term	4,881,294	4,942,376
Value adjustment for fair value hedge accounting	-722,709	-293,173
Accrued interest and premium/discount	72,385	72,573
Carrying amount Funds entrusted long term	**4,230,970**	**4,721,776**
Carrying amount as at 31 December	**6,160,587**	**7,173,835**
Movement in long-term Funds entrusted		
As at 1 January	4,942,376	5,092,009
Funds entrusted long term	69,509	135,363
Redemptions, accruals and currency revaluations	-130,591	-284,996
As at 31 December	**4,881,294**	**4,942,376**

Of the contractual long-term funds entrusted, a nominal amount of €0.5 million (2024: €120.0 million) has a remaining maturity of less than 12 months.

20 DEBT SECURITIES

The Debt securities item consists of negotiable interest-bearing debt instruments and can be broken down as follows:

	2025	2024
(x EUR 1,000)		
Bond loans	61,375,085	61,437,156
Value adjustment for fair value hedge accounting	-5,939,182	-4,904,948
Accrued interest and premium/discount	463,347	474,805
Carrying amount Bond loans	**55,899,250**	**57,007,013**
Short-term debt securities	2,054,482	5,721,636
Value adjustment for fair value hedge accounting	1,272	-2,790
Accrued interest	17,033	42,963
Carrying amount Short-term debt securities	**2,072,787**	**5,761,809**
Carrying amount as at 31 December	**57,972,037**	**62,768,822**
Movement in bond loans		
As at 1 January	61,437,156	60,684,098
Bond loans	10,938,493	9,510,086
Redemptions and currency revaluations	-11,000,564	-8,757,028
As at 31 December	**61,375,085**	**61,437,156**

Of the total amount in long-term debt securities issued, a nominal €0.4 billion (2024: €0.5 billion) carries a variable interest rate. Of the long-term debt securities, a nominal €6.7 billion (2024: €9.6 billion) has a remaining term to maturity of less than 12 months.

As part of NWB Bank's sustainability strategy, NWB Bank funds itself (partly) with Environmental, Social and Governance (ESG) bonds. The ESG bonds consist of SDG Housing Bonds to finance social housing in the Netherlands and Water Bonds to finance the water authorities. These ESG bonds amounted to €26.2 billion at year-end 2025 in nominal terms (2024: €25.3 billion).

21 OTHER LIABILITIES

The Other liabilities item can be broken down as follows:

(x EUR 1,000)	2025	2024
Prepaid interest and redemptions	9,957	5,004
Other liabilities	9,205	15,034
Total	**19,162**	**20,038**

The other liabilities for 2025 and 2024 relate to accrued payment transactions.

22 DERIVATIVE LIABILITIES

The Derivative liabilities item consists of interest rate swaps and currency swaps, caps, floors and swaptions. These products are carried at fair value, including accrued interest. Generally accepted valuation models are applied, based on the most appropriate valuation curves, which at year-end 2025 were at a higher level compared to year-end 2024. In the 2025 breakdown of derivatives below, derivatives totalling €4,700 (2024: €260,293) were not included in hedge accounting.

Breakdown by remaining term to maturity of negative fair values as at 31 December 2025 and 2024 respectively:

(x EUR 1,000)	<3 months	3-12 months	1-5 years	>5 years	Total
2025					
Interest rate swaps	2,429	908	35,113	1,978,452	2,016,902
Currency swaps	52,103	207,247	754,146	384,003	1,397,499
Caps, floors and swaptions	-	-	130	105,046	105,176
Total 2025	**54,532**	**208,155**	**789,389**	**2,467,501**	**3,519,577**
2024					
Interest rate swaps	744	451	41,169	2,746,080	2,788,444
Currency swaps	-	103,316	256,945	343,212	703,473
Caps, floors and swaptions	-	-	493	217,836	218,329
Total 2024	**744**	**103,767**	**298,607**	**3,307,128**	**3,710,246**

23 INCOME TAX

Income tax payable in 2025 and 2024 can be broken down as follows:

(x EUR 1,000)	2025	2024
2023	-	-5
2024	-	-263
2025	3,325	-
Total income tax payable	**3,325**	**-268**

Income tax payable for the current year can be broken down as follows:

(x EUR 1,000)	2025	2024
Current tax expense	47,326	40,436
Advances paid	-44,001	-40,699
Total income tax payable current year	**3,325**	**-263**

24 ACCRUALS AND DEFERRED INCOME

The Accruals and deferred income item comprises advance receipts for income attributable to the next accounting period(s) as well as uninvoiced amounts payable regarding expenses attributable to the past accounting period(s).

25 PROVISIONS

The item Provisions consists of a provision for deferred taxes, a provision for pensions, and a provision for the contribution to the Single Resolution Board (SRB) consisting of Irrevocable Payment Commitments (IPCs).

Deferred taxes provision

The movements in deferred tax liabilities are as follows:

(x EUR 1.000)	2025	2024
As at 1 January	7,123	8,900
Change in provision for pensions	147	34
Change as a result of (unrealised) gains and losses of interest-bearing securities at fair value through OCI	-	-
Change in valuation of property in use by the bank	-	-285
Results from 'basisrentelening' loans deferred for tax purposes	-811	-811
Results from maturity extensions deferred for tax purposes previous years	-657	-715
Adjustment to income tax rate in coming years	-	-
As at 31 December	**5,802**	**7,123**

Pension provision

The movements in the pension provision are as follows:

(x EUR 1.000)	2025	2024
Interest cost	811	770
Expected return on plan assets	-714	-682
Administrative and other costs	4	9
Employee benefits expenses	**101**	**97**

(x EUR 1.000)	2025	2024
Expected return on plan assets	22,212	25,058
Administrative and other costs	-19,762	-22,040
Employee benefits expenses	**2,450**	**3,018**

(x EUR 1,000)	2025	2024
Opening balance defined benefit obligation	**25,058**	**26,113**
Interest cost	811	770
Benefits paid	-966	-925
Gain (loss) caused by demographic changes (in assumptions)	-	12
Gain (loss) caused by financial changes (in assumptions)	-2,691	-912
Closing balance defined benefit obligation	**22,212**	**25,058**

(x EUR 1,000)	2025	2024
Opening balance fair value of plan assets	**22,040**	**22,964**
Employer contributions	193	187
Benefits paid	-966	-925
Interest income	714	682
Return excluding interest income	-2,219	-868
Fair value of plan assets as at 31 December	**19,762**	**22,040**

The provision relates to the accrued entitlements of all participants up to and including 2019 (in 2019, the benefit pension plan for active employees changed from a defined benefit plan to a defined contribution plan) and the indexation of pension benefits for non-active employees.

The projected employer contributions for 2026 to the defined benefit plans at the end of 2025 amount to €190,000 for non-active employees (2024: €200,000).

The key assumptions used in determining the provision for pension plan obligations are as follows:

(x EUR 1,000)	2025	2024
Discount rate	4.10%	3.30%
Future indexation inactives	1.00%	1.00%

Provision for the contribution to the SRB consisting of IPCs

NWB Bank has made use of the option to pay part of its contribution to the SRB in the form of IPCs. For these IPCs, amounting to €9.2 million, there was a contingent obligation up to and including the 2024 financial year, which was recognised under the item Irrevocable commitments. In 2025, the Court of Justice of the European Union ruled on appeal that a credit institution would not be able to claim repayment of the IPCs in the event that the banking licence is surrendered. As a result of this ruling, the classification has changed from a contingent liability to a provision. The maximum charge relating to this provision amounts to €9.2 million. As NWB Bank operates under the going concern assumption as a bank, the present value of the provision is not significant. Therefore, as at 31 December 2025, NWB Bank has not recognised a provision.

26 SUBORDINATED DEBT

Given the leverage ratio requirements implemented by the regulatory authority at the time, the bank began raising hybrid capital (in the form of subordinated loans) in 2015. The initial tranche of €200 million was issued in September 2015. The loans are intended to boost NWB Bank's Tier 1 capital. The second tranche of €120.5 million followed in 2016. No new hybrid capital was raised since then.

The hybrid capital was provided by Dutch public sector parties and is subordinated to receivables from creditors with a higher order of priority than ordinary shares. In addition, the hybrid capital is perpetual and does not have a fixed repayment date. Early redemption is subject to the consent of the regulatory authority on dates agreed in advance or in specific situations. The interest rate is between 2.34% and 4.576% for the period until the next early redemption date and will be subsequently reset provided no early redemptions have been made. Interest payments by the bank are entirely discretionary. The payments on the Tier 1 capital are tax deductible. If the Tier 1 core capital ratio falls below a specified minimum (for €150 million 11.25% for others 5.125%), the notional principal amount of these and all similar loans will be reduced to bring the Tier 1 core capital ratio back above the specified minimum.

The movements in subordinated debt are set out below:

(x EUR 1,000)	2025	2024
As at 1 January	**327,184**	**325,703**
Subordinated debt issued	-	-
Change in accrued interest and premium	-25	1,481
As at 31 December	**327,159**	**327,184**

27 PAID-UP AND CALLED-UP SHARE CAPITAL

Paid-up and called-up share capital consists of:

A shares

These shares have a nominal value of €115, of which 100% was required to be paid up. Each A share carries one vote at a shareholders meeting.

B shares

These shares have a nominal value of €460, of which 25% was required to be paid up. Under the Articles of Association, the Supervisory Board may call for further payments to be made. Each B share carries four votes at a shareholders meeting.

BREAKDOWN AT YEAR-END 2025

(x EUR 1,000)	Issued	Paid up
A SHARES		
As at 31 December 2025 (50,478 shares)	5,805	5,805
B SHARES		
As at 31 December 2025 (8,511 shares)	3,915	1,019
Of which unpaid (8,510 shares)	-2,896	
Total paid up as at 31 December 2025		**6,824**
Total paid up as at 31 December 2024		6,824

28 REVALUATION RESERVES

The movements in the revaluation reserves in 2025 and 2024 are as follows:

(x EUR 1,000)	Revaluation reserve interest-bearing securities	Other revaluation reserves	Total
Movements 2025:			
As at 1 January 2025	**23**	**2**	**25**
Changes in the (unrealised) value of interest-bearing securities	-	-	-
As at 31 December 2025	**23**	**2**	**25**
Movements 2024:			
As at 1 January 2024	**23**	**2**	**25**
Changes in the (unrealised) value of interest-bearing securities	-	-	-
As at 31 December 2024	**23**	**2**	**25**

29 OTHER RESERVES

The movements in Other reserves are as follows:

(x EUR 1,000)	Total
Movements 2025:	
As at 1 January 2025	**1,993,287**
Appropriation of 2024 profit	93,694
Distribution for 2024	-50,000
Changes in value as part of the pension provision	353
As at 31 December 2025	**2,037,334**
Movements 2024:	
As at 1 January 2024	**1,927,501**
Appropriation of 2023 profit	125,755
Distribution for 2023	-60,000
Changes in value as part of the pension provision	31
As at 31 December 2024	**1,993,287**

30 UNAPPROPRIATED PROFIT FOR THE YEAR

The balance sheet is presented before profit distribution. The proposed profit distribution is as follows:

(x EUR 1,000)		2025		2024
Profit for the year		**112,547**		**93,694**
The proposed profit appropriation is as follows:				
Cash dividends on A shares	777%	45,087	733%	42,535
Cash dividends on B shares	777%	7,913	733%	7,465
		53,000		**50,000**
Added to the reserves on the approval of the Supervisory Board		59,547		43,694
		112,547		**93,694**

31 IRREVOCABLE COMMITMENTS

The Irrevocable commitments relate to:

(x EUR 1,000)	2025	2024
Loans granted but not yet paid	905,104	743,974
Committed purchase of interest-bearing securities	-	636,600
Unused current account overdraft facilities	971,310	901,203
Unused financing facilities	2,714,514	2,745,650
Guarantees issued	1,368	3
Irrevocable Payment Commitments (IPCs) to the SRB	-	9,193
	4,592,296	**5,036,623**

The unused current account overdraft facilities have a short maturity (less than or equal to one year). The other items have a long maturity (more than one year).

NWB Bank entered into back-stop liquidity facilities (WSW obligo loans) for in total €1,233 million (2024: €1,138 million) with 140 (2024: 142) housing associations under a Social Housing Guarantee Fund (WSW) guarantee and are included under Unused financing facilities. Under these facilities, drawdowns are only permitted under specific circumstances.

In 2025, the bank entered into a lease agreement for an office building. The building was taken into use in 2026, and the agreement's contractual term is ten years. Rent is paid quarterly and recognised in the profit and loss account under 'Other administrative expenses'.

NWB Bank has opted to pay part of its contribution to the SRB in the form of IPCs. A provision has been recognised for this amount as a result of a 2025 ruling by the Court of Justice of the European Union. Further details can be found in the note 'Provisions'. For the 2024 financial year, this was classified as a contingent liability.

OTHER NOTES TO THE FINANCIAL STATEMENTS

32 EXPECTED CREDIT LOSS (ECL)

NWB Bank uses the option to apply the 'expected loss impairment methodology' of IFRS 9. Under IFRS 9, NWB Bank recognises a provision for expected credit loss (ECL) for each client with a credit facility. A provision is also taken for expected losses on loan commitments and financial guarantee contracts, so-called off-balance sheet positions. It is the case, however, that the majority of the bank's exposures are guaranteed by the government. As a result, there is limited credit risk.

The ECL methodology used by the bank consists of a scoring and rating model, a macro-economic model, models for Probability of Default (PD), Loss Given Default (LGD) and Exposure at Default (EAD), and scenarios (macro-economic forecasts). Each of these components is used to calculate the final ECL provision.

Influence of ESG factors

In credit proposals, we routinely outline the sustainability impacts and risks involved. Examples include the pace of climate impact reduction and exposure to physical climate risks. These factors are explicitly included in the scorecards we use for our client sectors.

With the annual analyses of new and existing clients, consisting of quantitative scorecards and qualitative revisions, we monitor the credit risk of the clients in our portfolio. We translate material ESG risks from the RMA into ESG risk variables based on ESG data, which are included in the scorecards and thus integrally weigh in the client's credit risk score.

The table below depicts the course of the ECL in 2025 and 2024.

(x EUR 1,000)	As per 31 December 2024	2025	As per 31 December 2025
Loans and receivables	-583	-589	-1,172
Interest-bearing securities	-3	-21	-24
Total	**-586**	**-610**	**-1,196**

(x EUR 1,000)	As per 31 December 2023	2024	As per 31 December 2024
Loans and receivables	-441	-142	-583
Interest-bearing securities	-9	6	-3
Total	**-450**	**-136**	**-586**

Broken down by cause, the summary of movements is as follows:

(x EUR 1,000)	2025	2024
Total as at 1 January	**-586**	**-450**
Update macro-economic projections	-107	129
Change in LGD	-	56
Adjustments credit risk scores	-503	-321
Total as at 31 December	**-1,196**	**-586**

The breakdown of ECL recognised in the statement of income for the financial year is as follows:

	From 01-01-2025 to 31-12-2025			
	Stage 1	Stage 2	Stage 3	Total
(x EUR 1,000)				
Mutation ECL in P&L				
- Increase through new loans and loans taken over	72	116	-	188
- Decrease through redemptions	-2	-	-	-2
- Changes by credit risk (net)	70	354	-	424
Total	**140**	**470**	**-**	**610**

	From 01-01-2024 to 31-12-2024			
	Stage 1	Stage 2	Stage 3	Total
(x EUR 1,000)				
Mutation ECL in P&L				
- Increase through new loans and loans taken over	30	-	-	30
- Decrease through redemptions	-17	-	-	-17
- Changes by credit risk (net)	-56	179	-	123
Total	**-43**	**179**	**-**	**136**

On balance, the ECL provision at the end of 2025 increased compared with the end of 2024, mainly due to a shift of exposures on a number of renewable energy projects from stage 1 to stage 2. In addition, the bank reassessed the macroeconomic parameters in the ECL model and updated them based on recent figures from the Netherlands Bureau for Economic Policy Analysis (CPB).

In 2025, the following LGD percentages are applied (further refined in 2024): loans to the government or loans guaranteed by the government 0%, loans guaranteed by non-government institutions 10%, project finance 20%, loans to government-owned public limited companies (N.V.s) 25%, and finally other non-guaranteed loans 30%.

Impairment of loans and receivables and interest-bearing securities

The following table provides a breakdown of the loans and receivables and interest-bearing securities to which the ECL model is applied. Gross exposures include the loans and receivables recognised on the balance sheet, the interest-bearing securities not measured at quoted market value, and the committed loans, committed interest-bearing securities, and credit and financing facilities included under the item irrevocable commitments. Potential guarantees are excluded from this analysis.

Stage 1 concerns the performing exposures without a Significant Increase in Credit Risk (SICR) since the starting date.

Stage 2 concerns the performing exposures with an SICR since the starting date.

Stage 3 concerns the non-performing exposures that are credit-impaired.

	Gross carrying amount	Performing Stage 1	Performing Stage 2	Non-Performing Stage 3
(x EUR 1,000)				
as of 31 December 2025				
Loans and receivables	59,172,427	58,360,787	723,198	88,442
Interest-bearing securities	7,136,044	7,136,044	-	-
Total	**66,308,471**	**65,496,831**	**723,198**	**88,442**

(x EUR 1,000)	Gross carrying amount	Performing Stage 1	Performing Stage 2	Non-Performing Stage 3
as of 31 December 2024				
Loans and receivables	63,069,801	59,779,205	3,207,831	82,765
Interest-bearing securities	5,357,860	5,357,860	-	-
Total	**68,427,661**	**65,137,065**	**3,207,831**	**82,765**

The decrease in exposure in Stage 2 in 2025 is mainly due to an improvement in the credit risk score of two large housing associations. This change has no impact on the ECL provision, as the exposures are guaranteed by the government.

At the end of December, an amount of €88.4 million (2024: €82.8 million) was classified as credit impaired. This amount relates to exposures in Stage 3 and concerns exposures from 7 clients (2024: 7). These Stage 3 exposures are covered by a public authority guarantee and do not result in an ECL provision or a write-off.

Following is a more detailed explanation of how the stages progress:

Stage 1: 12-month ECL

Stage 1 includes exposures that show no SICR since their initial recognition. A 12-month ECL is recognised for this group, which is the ECL based on the probability that the exposure will default within 12 months of the reporting date. The 12-month ECL is calculated for all individual exposures as a function of the Exposure At Default (EAD), Probability of Default (PD) and Loss Given Default (LGD) and including forward-looking (macro-economic) indicators.

An exposure moves from Stage 1 to Stage 2 if one of the following criteria are met:

1. A substantial loan claim has been outstanding for more than or equal to 30 days (30-day indicator serves as a 'backstop indicator');
2. There is a significant increase in the credit risk. This is the case if an internal rating threshold has been exceeded;
3. There are other qualitative indicators including information from a credit rating agency, the qualification of an exposure as 'forborne performing' or if an exposure is on the internal watch list.

The 12-month ECL is calculated for all individual exposures as a function of the EAD, PD and LGD and including forward-looking (macro-economic) indicators.

Stage 2: lifetime ECL (not credit-impaired)

Stage 2 includes exposures that show an SICR since initial recognition but have not defaulted. A lifetime ECL is recognised for these exposures, taking into account any guarantees and received collateral. This concerns the expected shortfalls on the contractual cash flows for the remaining duration of the exposure, discounted at the effective interest rate. The lifetime ECL is calculated for all individual exposures as a function of the EAD, PD and LGD and including forward-looking (macroeconomic) indicators.

To determine whether an exposure moves from Stage 2 to Stage 3, the 90-day arrears period acts as a backstop indicator.

An exposure enters Stage 3 when it is credit-impaired. This is the case when:

1. A substantial loan claim has been outstanding for more than 90 days;
2. The bank considers it unlikely that the client will meet its credit claims ('unlikely-to-pay' (UTP)) without recourse to remedial action such as invoking a guarantee.

Stage 3: lifetime ECL (credit-impaired)

Exposures with payment arrears of 90 days or more fall under Stage 3 and are classified as defaulted. However, Stage 3 also includes exposures that are identified as credit-impaired in line with the internally applied definition of default. Therefore, this also includes exposures that are forborne non-performing. If a client defaults, all exposures to that client are moved to Stage 3 and classified as credit-impaired.

A lifetime ECL is recognised for these exposures, taking into account any guarantees and received collateral. This concerns the expected shortfalls on the contractual cash flows for the remaining duration of the exposure, discounted at the effective interest rate. The lifetime ECL is calculated for all individual exposures as a function of EAD, PD and LGD and including forward-looking (macro-economic) indicators. Subsequently, the lifetime ECL is deducted from the outstanding gross carrying amount on the balance sheet. In other words, an impairment is taken on the exposure.

Migrating back to a higher ECL stage

If the creditworthiness improves and the exposure no longer meets the above criteria, it can migrate from Stage 2 back to Stage 1 or from Stage 3 to Stage 2. This occurs according to the bank's Credit Risk Management Policy and Non-Performing Loan Policy.

Determining a SICR

An SICR exists when the credit rating at the time of reporting has significantly deteriorated compared with the credit rating at the the origination date. Whether a SICR occurred depends on the credit risk classification:

- Exposures with a credit rating of 7 or better (i.e. ≤7): a significant credit risk increase occurs when the credit rating shifts to 8 or worse (i.e. ≥8).
- Exposures with a credit rating of 8 or worse (i.e. ≥8): a significant credit risk increase when the credit rating shifts a notch. For example, from 8 to 9 is a one-notch shift.

NWB Bank has an internal credit rating scale from 1 to 15. Credit ratings 1 to 7 relate to higher-creditworthy classified exposures (investment grade); ratings 8 to 14 relate to lower-creditworthy classified exposures (non-investment grade); and 15 relates to exposures in default. The internal credit rating scale is calibrated with the help of a reputable external credit rating agency. Internal credit ratings of >7 are non-investment grade and correspond to a rating of BB+ or worse.

Rating classes

The ECL provision is based on rating classes. The following overview presents the ECL by rating class.

The breakdown as at 31 December 2025 and 31 December 2024 is as follows:

31 DECEMBER 2025

(x EUR 1,000)	Stage 1			Stage 2			Stage 3		
Rating class	Gross carrying amount guaranteed	Gross carrying amount not guaranteed	ECL	Gross carrying amount guaranteed	Gross carrying amount not guaranteed	ECL	Gross carrying amount guaranteed	Gross carrying amount not guaranteed	ECL
1	2,345,831	3,341,787	4	-	-	-	-	-	-
2	5,288,634	131,917	1	-	-	-	-	-	-
3	7,013,061	-	-	-	-	-	-	-	-
4	28,609,631	1,909,613	113	10,471	-	-	-	-	-
5	12,902,317	622,158	87	61,647	-	-	-	-	-
6	1,234,696	407,270	69	333,636	-	-	-	-	-
7	562,046	1,048,575	181	122,921	146,426	412	-	-	-
8	44,233	25,280	13	11,583	36,095	317	-	-	-
9	-	-	-	-	-	-	-	-	-
10	-	-	-	180	-	-	-	-	-
11	9,782	-	-	239	-	-	-	-	-
12	-	-	-	-	-	-	-	-	-
13	-	-	-	-	-	-	-	-	-
14	-	-	-	-	-	-	-	-	-
15	-	-	-	-	-	-	88,442	-	-
Total	**58,010,231**	**7,486,600**	**468**	**540,677**	**182,521**	**729**	**88,442**	**-**	**-**

31 DECEMBER 2024

(x EUR 1,000)	Stage 1			Stage 2			Stage 3		
Rating class	Gross carrying amount guaranteed	Gross carrying amount not guaranteed	ECL	Gross carrying amount guaranteed	Gross carrying amount not guaranteed	ECL	Gross carrying amount guaranteed	Gross carrying amount not guaranteed	ECL
1	889,290	3,423,976	3	-	-	-	-	-	-
2	5,065,493	19,484	-	-	-	-	-	-	-
3	6,866,849	-	-	-	-	-	-	-	-
4	24,899,638	1,812,855	79	351,522	-	-	-	-	-
5	16,372,444	355,405	37	776,279	-	-	-	-	-
6	3,093,289	490,451	52	1,854,143	-	-	-	-	-
7	798,430	957,831	149	41,739	31,626	75	-	-	-
8	10,596	21,506	8	60,497	24,835	184	-	-	-
9	-	-	-	6,725	-	-	-	-	-
10	-	-	-	60,197	-	-	-	-	-
11	59,528	-	-	268	-	-	-	-	-
12	-	-	-	-	-	-	-	-	-
13	-	-	-	-	-	-	-	-	-
14	-	-	-	-	-	-	-	-	-
15	-	-	-	-	-	-	82,765	-	-
Total	**58,055,557**	**7,081,508**	**328**	**3,151,370**	**56,461**	**259**	**82,765**	**-**	**-**

Ratings 1 to 7 are classified as 'investment grade', while ratings 8 to 14 are 'non-investment grade'. Finally, rating 15 concerns the classification 'default'.

Analysis of the 'performing exposures' according to maturity date

The following table shows the amounts that have matured but have not been received at reporting date, which have not been included in Stage 3.

(x EUR 1,000)	31 December 2025	31 December 2024
Less than or equal to 30 days	2,452	851
Greater than 30 days and less than or equal to 60 days	-	-
Total	2,452	851

Parameters and assumptions used

The ECL of a financial asset is determined on the basis of 12 months or its entire term, depending on whether there has been a significant increase in credit risk. The total ECL is determined based on the product of the Probability of Default (PD), Loss Given Default (LGD) and Exposure at Default (EAD), discounted to the reporting date.

Probability of Default (PD)

The PD is used to determine the ECL and the SICR. The bank has developed PD models for its lending for which no external rating is available, which are largely based on expert judgement combined with accepted mathematical techniques.

Loss given Default (LGD)

The LGD concerns the loss in case of non-payment. The majority of the bank's portfolio consists of loans guaranteed by the State of the Netherlands.

Exposure at Default (EAD)

The EAD concerns the expected value of the exposure at the moment when the counterparty defaults. This value includes the principal amount, the accrued interest, the premium/discount, the value adjustment resulting from the application of fair value hedge accounting and any amount due but not yet received. The effect of potential early redemptions is minimal and therefore not included in the EAD.

Low credit risk exemption

For exposures included in the item interest-bearing securities, the bank applies a 'low credit risk exemption' (LCRE) in accordance with IFRS 9. IFRS 9 allows the bank to assume, without further analysis, that the credit risk on a financial instrument has not increased significantly since its initial recognition if it is determined that the financial instrument has a low credit risk at the reporting date. A financial instrument with an external rating of investment grade is an example of a financial instrument that can be considered low credit risk.

From credit risk score per client to PD rating per exposure

NWB Bank assigns an (internal) credit rating to each exposure at the time of origination.

The credit rating is derived from the Master Scale of the ECL model. Important input for the ECL model is the Credit Risk Score (CRS). The bank assigns a CRS to each client to calculate the ECL per exposure. The CRS is based on three modules: (i) financial metrics, (ii) non-financial metrics and (iii) ESG metrics, with various variables included for the environmental, social and governance (ESG) module. CRSs have a rating classification of best to worst scores ranging from 1 to 21. The internal credit ratings from the Master Scale are used in accordance with IFRS guidelines. The Master Scale links CRSs with default rates and the final credit rating. The Master Scale developed by the bank is calibrated with the help of a reputable external credit rating agency. The CRS is reviewed in accordance with the credit management cycle to determine whether it is a SICR under ECL IFRS guidelines.

Macro-economic variables

Macro-economic variables are taken into account for the determination of the ECL.

This takes into account forward-looking developments that may affect potential credit losses. The macro-economic variables that have been considered are unemployment and inflation. The bank uses its internally developed models to make projections about unemployment and inflation. In December 2025 and December 2024, the bank updated its projections for inflation and unemployment. The weighting of the scenarios remained unchanged in 2025 compared with 2024. The baseline scenario is weighted at 60%, the upside scenario at 10%, and the downside scenario at 30%.

The following breakdown provides an overview of the macro-economic variables and the weightings assigned to them.

Macro-economic variable	Scenario	Weighting as at 31 December 2025	Weighting as at 31 December 2024
Unemployment	Base scenario	0.60	0.60
	Upward scenario	0.10	0.10
	Downward scenario	0.30	0.30
Inflation	Base scenario	0.60	0.60
	Upward scenario	0.10	0.10
	Downward scenario	0.30	0.30

The following breakdown provides an overview of the macro-economic variables and the percentages used in the baseline scenario.

	Year	% as at 31 December 2025	% as at 31 December 2024
Unemployment	2025		3.80
	2026	4.05	4.10
	2027	4.20	4.30
	2028	4.35	
Inflation	2025		2.80
	2026	2.25	2.90
	2027	2.20	2.30
	2028	2.00	

Sensitivity analysis

The following analysis was carried out to measure the ECL's sensitivity to the various factors. The calculation of the ECL is partly determined by the assumed macro-economic variables. The following overview shows the impact on the ECL in different scenarios.

Breakdown of the ECL into economic scenarios

		2026	2027	2028	Probability-weighting scenario	Weighted ECL	Total ECL
31 December 2025							
Scenario 1: Down market	Inflation NL	1.61	1.56	1.36	0.30	445	
	Unemployment NL	4.83	4.98	5.13	0.30		
Scenario 2: Stable	Inflation NL	2.25	2.20	2.00	0.60	670	1,196
	Unemployment NL	4.05	4.20	4.35	0.60		
Scenario 3: Up market	Inflation NL	2.91	2.86	2.66	0.10	81	
	Unemployment NL	3.21	3.36	3.51	0.10		

		2025	2026	2027	Probability-weighting scenario	Weighted ECL	Total ECL
31 December 2024							
Scenario 1: Down market	Inflation NL	2.76	1.86	1.66	0.30	222	
	Unemployment NL	4.58	4.88	5.08	0.30		
Scenario 2: Stable	Inflation NL	2.80	2.90	2.30	0.60	326	586
	Unemployment NL	3.80	4.10	4.30	0.60		
Scenario 3: Up market	Inflation NL	4.06	3.16	2.96	0.10	38	
	Unemployment NL	2.96	3.26	3.46	0.10		

Analysis 1: Sensitivity of the ECL if 100% of the individual scenarios were to be applied

The table below shows the sensitivity of the ECL if 100% of the individual scenarios (downside, baseline and upside) were to be applied to all exposures as of year-end in December 2025. Given the limited size of non-government guaranteed exposures, the sensitivity to the different scenarios is limited.

Sensitivity Analysis - scenarios as per 31 December 2025	100% Downward scenario	100% Basis scenario	100% Upward scenario
(x EUR 1,000)			
ECL	1,483	1,117	810

Sensitivity Analysis - scenarios as per 31 December 2024	100% Downward scenario	100% Basis scenario	100% Upward scenario
(x EUR 1,000)			
ECL	739	544	382

Analysis 2: All Credit Risk Scores deteriorate by 1 step (CRS+1)

In this analysis, the most important factor in the calculation of the ECL, Credit Risk Scores (CRS), is shifted with a deterioration of plus 1. The impact of this shift on the ECL is an increase of approximately €3.4 million (2024: €1.3 million). As a result, the ECL would be approximately €4.6 million (2024: €1.9 million) instead of the amount of €1.2 million (2024: €0.6 million) reported on 31 December 2025.

33 FAIR VALUE OF FINANCIAL INSTRUMENTS

General

The fair value is the amount for which an asset can be exchanged or a liability settled in a transaction between knowledgeable, willing parties that are independent of each other.

When determining the fair value of financial instruments, reference is made to market prices to the extent the financial instruments are traded in an active market. Such market prices are unavailable for most financial instruments, however. In such cases, the fair value is determined using measurement models. The models are based on various assumptions relating to the discount rate and the timing and the size of the projected future cash flows. When calculating the fair value of options, generally accepted option pricing models are used.

NWB Bank periodically establishes that the application of the measurement models leads to reliable fair values that fit the risk profile of the assets and liabilities.

Ongoing changes in market conditions lead to regular adjustments to the measurement parameters that serve as inputs for the measurement models.

Cash, cash equivalents and deposits at the Central Bank, receivables from credit institutions, debts to credit institutions, loans and receivables, funds entrusted and debt securities

A measurement model is used to determine the fair value of cash, cash equivalents and deposits at the Central Bank, receivables from credit institutions, debts to credit institutions, loans and receivables, funds entrusted and debt securities. The model is also used as a basis for internal risk reports.

The principle underlying the model is a going-concern approach under which the bank:
1. generally grants the loans it holds until they mature, and
2. funds the relatively long-term loans with on average shorter-term funding.

The valuation curve is based on the average cost of funding, which is the interest rate swap curve plus a spread. This spread is effectively a measure of the additional funding charges the bank pays on account of liquidity and credit risks. These additional charges are determined based on the outstanding debt as at the reporting date. The spreads resulting from this calculation method is used across all relevant maturities (continuous curve). The assumption is that the spreads applying to the bank are equally representative of the non-market-observable spreads applying to the bank's borrowers. A provision for uncollectibility is determined based on the Expected Credit Loss (ECL) methodology of IFRS 9.

Interest-bearing securities

Other listed interest-bearing securities are carried at market prices. The fair values of the other interest-bearing securities held to maturity and other unlisted interest-bearing securities are determined by means of the same model used for loans and receivables. A provision for uncollectibility is determined based on the ECL methodology of IFRS 9.

Derivatives

Derivatives are measured by applying generally accepted valuation models, based on the most appropriate valuation curves, which include the OIS curve and the €STR curve.

A credit valuation adjustment and a debt valuation adjustment are also included in the valuation. The curves used, reflect the price level at which the bank can enter into new swaps. Credit risks associated with the derivatives transactions entered into are largely mitigated by exchanging collateral.

Overview of fair value of financial instruments

The following table sets out the estimated fair value of the financial assets and liabilities. For comparative purposes, accrued interest is allocated to the carrying amounts. A number of balance sheet items are not included in the table as they do not meet the definition of a financial asset or liability.

(x EUR 1,000,000)	Carrying amount 31-12-2025	Fair value 31-12-2025	Carrying amount 31-12-2024	Fair value 31-12-2024
ASSETS				
Cash, cash equivalents and deposits at the Central Bank	1,432	1,432	6,623	6,623
Loans and advances to credit institutions	2,810	2,815	2,622	2,622
Loans and receivables	54,968	54,131	59,158	59,383
Interest-bearing securities	8,114	8,288	5,584	5,582
Derivative assets	5,436	5,436	4,740	4,740
LIABILITIES				
Debts to credit institutions	2,692	2,616	2,658	2,593
Funds entrusted	6,161	6,000	7,174	7,178
Debt securities	57,972	57,252	62,769	62,762
Subordinated debt	327	330	327	331
Derivative liabilities	3,520	3,520	3,710	3,710

Determining the fair value of financial instruments

The table below sets out how the fair value of financial instruments carried at fair value in the balance sheet are determined.

(x EUR 1,000,000)	Measurement based on market prices	Measurement based on models using data available in the market	Measurement based on models using data unavailable in the market
31 December 2025			
ASSETS			
Interest-bearing securities	60		
Derivative assets		5,436	
LIABILITIES			
Derivative liabilities		3,520	
31 December 2024			
ASSETS			
Interest-bearing securities	862		
Derivative assets		4,740	
LIABILITIES			
Derivative liabilities		3,710	

Other financial instruments listed above under fair value of financial instruments were valued based on models using data available in the market.

Financial derivatives

(x EUR 1,000,000)	≤1 year	1-5 years	>5 years	Total
2025				
Notional amounts of interest rate derivatives	4,703	30,526	114,005	**149,234**
Notional amounts of currency derivatives	5,827	9,524	2,613	**17,964**
2024				
Notional amounts of interest rate derivatives	4,397	21,507	119,687	**145,591**
Notional amounts of currency derivatives	13,447	9,002	2,809	**25,258**

The notional amounts of the caps and floors total €52 million (2024: €72 million) and those of the swaptions €1,324 million (2024: €1,438 million). These derivatives are included under the interest rate derivatives in the above table.

34 INFORMATION ON RELATED PARTIES

The shareholders and the members of the Managing and Supervisory Boards qualify as related parties. With respect to the obligation to report information on related parties, there are no particular circumstances at NWB Bank that warrant disclosure.

For more information on the remuneration of the Managing Board, please refer to **note 4**.

At year-end 2025, €8,286 million in loans had been granted to shareholders on market terms (2024: €8,304 million).

35 RISK MANAGEMENT

The bank's strategy places strict requirements on risk management and the organisation and enforcement of adequate internal controls. NWB Bank has adopted an organisation-wide approach to risk management and control. This chapter provides further insight into, in particular, the quantitative aspects of the various risks. The classification follows the risk taxonomy as discussed in the risk management section of the Report of the Managing Board.

Financial risks

Financial risks are risks related to financing, which NWB Bank manages at the individual and/or portfolio level. The bank continuously attempts to improve its understanding of exposures to these risks and how to manage them. Financial risks are subdivided into credit risk, interest rate risk, market risk and liquidity risk.

Credit risk

At the reporting date, the total credit risk (including irrevocable commitments) expressed in risk-weighted assets based on the standard approach as set out in the Capital Requirements Regulation (CRR) is as follows:

		Europe			North	Rest of the		
	Risk weight	NL	EU	Non-EU	America	World	Total	RWA
(x EUR 1,000,000)								
2025								
Central governments	0%	1,992	50	35	-	-	2,077	-
Regional governments	0%	15,966	-	-	-	-	15,966	-
Institutions with delegated government duties	0% -130%	45,687	303	85	-	-	46,075	2,871
International organisations	0%	-	205	-	-	-	205	-
Development banks	0%	-	779	-	-	-	779	-
Banking counterparties[1]	0% -50%	428	761	6	183	7	1,385	367
RMBS (NHG) notes[1]	10% -15%	3,151	-	-	-	-	3,151	448
Covered bonds	10%	450	100	-	-	-	550	65
Other	100%	243	-	-	-	-	243	243
Total 2025		**67,917**	**2,198**	**126**	**183**	**7**	**70,431**	**3,994**
(x EUR 1,000,000)								
2024								
Central governments	0%	6,685	51	-	-	-	6,736	-
Regional governments	0%	16,578	-	-	-	-	16,578	-
Institutions with delegated government duties	0% -100%	48,453	152	-	-	-	48,605	2,617
International organisations	0%	-	-	-	-	-	-	-
Development banks	0%	-	261	-	-	-	261	-
Banking counterparties[1]	0% -50%	645	811	9	285	10	1,760	523
RMBS (NHG) notes[1]	15%	3,424	-	-	-	-	3,424	418
Covered bonds	10%	544	101	-	-	-	645	65
Other	100%	235	-	-	-	-	235	235
Total 2024		**76,564**	**1,376**	**9**	**285**	**10**	**78,244**	**3,858**

1) Based on external rating (External Credit Assessment Institution)

Most of NWB Bank's lending falls under the category of a 0% risk weighting, which means the credit risk is considered very limited. The counterparty credit risks and potential interbank deposits placed, fall under the 20%, 30%, 50% and 100% weighting categories. The RMBS (NHG) notes portfolio residential mortgages comprises senior A notes under the 10% and 15% weighting categories. A 100% weighting category applies to loans to Dutch drinking water companies and regional network companies, and for UMCs, a 20% risk weighting category applies. Finally, loans provided to renewable energy and PPP projects are included in the 100% or 130% risk weighting categories (2024: 100%), whereby a 0.75 multiplier is used for most renewable energy and PPP projects.

The table below provides an insight into the breakdown of long-term loans granted (paid out) by the bank:

	2025		2024	
	Nominal value	Balance sheet value	Nominal value	Balance sheet value
(x EUR 1,000,000)				
Water authorities	8,563	7,601	8,545	8,147
Municipalities	4,294	3,989	4,408	4,333
Provinces	291	262	317	299
Social housing	36,607	35,738	34,522	38,906
Healthcare institutions	1,886	1,829	1,985	2,007
Other borrowers under government guarantee	852	763	833	781
Joint schemes	724	650	721	674
Drinking water companies	1,433	1,329	1,445	1,397
Renewable energy	1,178	1,153	1,088	1,072
Public-private partnerships	959	876	956	896
Credit institutions	85	82	108	104
Other	139	129	307	301
Total	**57,011**	**54,401**	**55,235**	**58,917**

The balance sheet item loans and receivables, amounting to €54,968 (2024: €59,158) and receivables from credit institutions, amounting to €2,810 (2024: €2,622), include not only long-term loans but also short-term loans, current account balance receivables and pledged collateral.

NWB Bank's borrowers as listed above are mainly public authorities and entities in the social housing and healthcare sectors to which funds loaned are guaranteed by the public authorities. The non-guaranteed financing is included under Public-Private Partnerships, Drinking water companies, Renewable energy and Other. Both during the year and at the balance sheet date, arrears were low in monetary terms, of a technical nature and of a very short duration. In 2025, NWB Bank held notes of RMBS programmes from five Dutch issuers in its portfolio (2024: three), securitised by Dutch residential mortgage loans backed by the government under the NHG. For these notes, the bank only actively uses securitisation in its role as an investor, when it monitors the risks during the maturity and firmly intends to hold these NHG RMBS notes until the expected maturity date. With the investment in these bonds, NWB Bank is helping to finance government-guaranteed green residential mortgages. Credit risk is expressed in risk-weighted assets based on the Standardised Approach to Securitisations as set out in Article 61 and Article 262 of the CRR, in which the ratings issued by S&P, Moody's or Fitch are used to indicate credit risk.

The table below shows the data as at the end of the 2025 financial year.

Rating	Nominal amount (x 1,000,000)	Expected expiry date	Class
AAA	3,288	2071	A

The total fair value exposure from derivatives to financial counterparties at year-end 2025 was €1,148 million (2024: €1,075 million). Of this, €1,068 million was covered by collateral received by the bank (2024: €900 million). The total fair value exposure from derivatives from financial counterparties at year-end 2025 was €2,671 million (2024: €2,432 million), of which €2,495 million (2024: €2,432 million) was covered by collateral provided by the bank.

The tables below show the net fair value of the derivatives, including collateral received and provided.

(x EUR 1,000,000)	Positive resp. negative fair value derivatives	Netting negative resp. positive fair value derivatives	Cash collateral received resp. paid	Net position
31 December 2025				
ASSETS				
Cash, cash equivalents and deposits at the Central Bank	1,995	-847	-1,068	80
Prepayments and accrued income	3,441	-	-1,208	2,233
Total 2025	**5,436**	**-847**	**-2,276**	**2,313**
LIABILITIES				
Credit institutions	-3,519	847	2,495	-177
Equity	-	-	-	-
Total 2025	**-3,519**	**847**	**2,495**	**-177**

(x EUR 1,000,000)	Positive resp. negative fair value derivatives	Netting negative resp. positive fair value derivatives	Cash collateral received resp. paid	**Net position**
31 December 2024				
ASSETS				
Cash, cash equivalents and deposits at the Central Bank	2,353	-1,278	-900	175
Prepayments and accrued income	2,387	-	-1,635	752
Total 2024	**4,740**	**-1,278**	**-2,535**	**927**
LIABILITIES				
Credit institutions	-3,710	1,278	2,324	-108
Equity	-	-	-	-
Total 2024	**-3,710**	**1,278**	**2,324**	**-108**

Interest rate risk

NWB Bank uses different indicators to measure the interest rate risk.

Gap analysis

A gap analysis of undiscounted cash flows according to the interest rate period is shown below, based on the contractual interest review date or redemption date if the latter is earlier.

(x EUR 1,000,000)	Total	<3 months	3-12 months	1-5 years	>5 years
31 December 2025					
ASSETS					
Loans and receivables	68,692	14,264	3,885	12,719	37,824
Interest-bearing securities	8,373	939	335	2,816	4,283
Fixed-interest derivative assets	-31,234	-414	-1,090	-2,930	-26,800
Variable-interest derivative assets	42,785	24,930	17,720	17	118
Total assets	**88,616**	**39,719**	**20,850**	**12,622**	**15,425**
LIABILITIES					
Debts to credit institutions, funds entrusted and debt securities	69,030	5,594	9,443	29,034	24,959
Subordinated debt	331	52	257	3	19
Fixed-interest derivative liabilities	-40,262	-1,336	-7,726	-18,684	-12,516
Variable-interest derivative liabilities	54,754	40,536	13,963	232	23
Total liabilities	**83,853**	**44,846**	**15,937**	**10,585**	**12,485**
Total assets less liabilities 2025	**4,763**	**-5,127**	**4,913**	**2,037**	**2,940**

(x EUR 1,000,000)	Total	<3 months	3-12 months	1-5 years	>5 years
31 December 2024					
ASSETS					
Loans and receivables	79,478	20,788	3,654	12,422	42,614
Interest-bearing securities	5,713	531	346	2,160	2,676
Fixed-interest derivative assets	4,175	5,139	6,525	4,999	-12,488
Variable-interest derivative assets	5,231	-808	6,186	-103	-44
Total assets	**94,597**	**25,650**	**16,711**	**19,478**	**32,758**
LIABILITIES					
Credit institutions, funds entrusted and debt securities	73,944	9,413	11,753	24,840	27,938
Subordinated debt	331	53	205	54	19
Fixed-interest derivative assets	-8,061	-39	-2,874	-7,103	1,955
Variable-interest derivative assets	23,680	21,413	2,289	59	-81
Total liabilities	**89,894**	**30,840**	**11,373**	**17,850**	**29,831**
Total assets less liabilities 2024	**4,703**	**-5,190**	**5,338**	**1,628**	**2,927**

DV01

NWB Bank uses DV01 (the Dollar Value of One basis point) as the key measure of interest rate risk. This key measure indicates the change in price or fair value, expressed in monetary units, caused by a one-basis-point (0.01%) change in the yield curve. A system of DV01 limits applies to the overall interest rate risk position, which follows from the bank's risk appetite. These limits are related to the strategic interest rate position. The interest rate-sensitivity of the portfolio to which macro-hedging is applied is monitored on the basis of DV01s for various time intervals. To manage spread risk related to the refinancing of the bank, a spread DV01 measure and concomitant limit apply. They indicate a maturity mismatch between funding and lending. The spread DV01 is quantified on the basis of the interest rate sensitivity of all long-term lending and funding. At year-end 2025, it was within the limit set.

Earnings at Risk

Earnings at Risk (EaR) is a measure of the interest rate sensitivity of the bank's net interest income (NII). The EaR calculates the change in NII from an assumed change in the term structure of interest rates. The most relevant scenario assumes that current interest rates will be realised.

NWB Bank aims for a balanced exposure of its balance sheet positions to short-term interest rates. These are mainly the one-day, three-month and six-month interest rates.

These rates have different sensitivities to the interest rate shocks applied. The most sensitive is the one-day rate. It changes daily, which means that the shock is reflected in the calculation within one day. The six-month interest rate, however, will only do so once every six months when the new rate is set. Thus, for a loan for which the rate changes on the reference date, the shock, i.e. 50 basis points, will not be reflected until six months later. For a loan that changes rates one day later, the original shock of 25 basis points will take effect almost immediately, and the full shock of 50 basis points will only take effect after six months.

The EaR is therefore sensitive to both the moment at which the interest rates payable as well as receivable change. In addition, this measure is sensitive to which rates change at any given time. The bank uses a limit for the maximum exposure. The bank tries to match interest paid and received as far as possible but accepts deviations within such a limit.

The most negative scenario, at year-end 2025 and 2024, is show in the table below. The internal interest rate risk metric referred to in the table reflects a scenario involving an immediate parallel interest rate shock of +25 bp followed by a gradual parallel interest rate shock of +25 bp.

(x EUR 1,000,000)	Most negative scenario 2025	Most negative scenario 2024
Scenario: internal measure for interest risk	**-5.5**	**-6.5**

Scenario analysis

NWB Bank performs scenario analyses to gain additional insight into the interest rate risk. One of these scenarios is to calculate the changes in the fair value of equity in the event of a parallel shift in the yield curve of -200 bps and +200 bps. These scenarios are prescribed by the European Banking Authority (EBA), and the bank is expected to inform the supervisory authority if the outcomes exceed 20% of equity. A maturity-dependent post-shock interest rate floor is applied for each currency.

This starts at -100 bps at immediate maturities. This floor is increased by 5 bps per year to reach 0% for maturities of 20 years and more. The table below shows the six prescribed scenarios as at 31 December 2025 and 31 December 2024 and the impact on the economic value of equity. The impact on net interest income is also shown for the first two scenarios.

Since the third quarter of 2025, NWB Bank has reported the impact of a 200 basis point parallel shock as prescribed by the supervisory authority. This shock is applied under the assumption of a constant balance sheet, meaning that all cash flows are assumed to be reinvested in an instrument comparable to the one generating the cash flow. The internal metric assumes that net cash flows are held as liquid funds in the form of a deposit with DNB.

	Change in economic value of equity		Change in net interest income	
(x EUR 1.000.000)	Current period	Last period	Current period	Last period
1 Parallel up	-277.0	-271.2	-8.0	-6.5
2 Parallel down	253.0	234.1	4.0	6.5
3 Steepener	-38.0	-25.7	-	-
4 Flattener	-14.0	-27.6	-	-
5 Short rates up	-90.0	-98.3	-	-
6 Short rates down	94.0	103.0	-	-

Market risk

The table below shows the nominal values in millions in foreign currencies.

	2025				2024			
	Asset	Liability	Derivatives	**Total**	Asset	Liability	Derivatives	**Total**
(x EUR 1,000,000)								
AUD	-	-4,133	4,133	-	-	-5,130	5,130	-
CAD	-	-193	193	-	-	-393	393	-
CHF	-	-1,415	1,415	-	-	-1,075	1,075	-
GBP	-	-1,770	1,770	-	-	-4,796	4,796	-
HKD	-	-2,500	2,500	-	-	-500	500	-
JPY	-	-62,728	62,728	-	-	-64,102	64,102	-
NOK	-	-500	500	-	-	-500	500	-
NZD	-	-350	350	-	-	-416	416	-
SEK	-	-3,000	3,000	-	-	-4,650	4,650	-
USD	-	-11,432	11,432	-	-	-14,905	14,905	-
ZAR	-	-230	230	-	-	-230	230	-

Liquidity risk

The collateral value of the portion of the portfolio contributed as collateral to DNB was €15.1 billion at year-end 2025 (€13.4 billion at year-end 2024).

In terms of short-term funding, the bank mainly relies on its commercial paper market. The bank uses an ECP programme capped at €25 billion and a USCP programme capped at $25 billion. The bank has the highest short-term ratings (A-1+/P-1) with respect to those programmes.

The liquidity position is monitored daily. The aim of liquidity management is to ensure there are sufficient funds available for the bank to meet not only foreseen but also unforeseen financial commitments. The bank's management is informed daily through a liquidity gap analysis, containing differences between the cash flows receivable and payable. The liquidity position is subject to a system of limits.

The balance sheet categories according to the remaining contractual term, including all future undiscounted interest cash flows as well as centrally cleared derivatives and before proposed profit appropriation, are presented below.

(x EUR 1,000,000)	Total	<3 months	3-12 months	1-5 years	>5 years
31 December 2025					
ASSETS					
Cash, cash equivalents and deposits at the Central Bank	1,432	1,432	-	-	-
Loans and advances to credit institutions	2,809	7	22	51	2,729
Loans and receivables	89,834	2,097	5,530	18,918	63,289
Interest-bearing securities	10,621	185	385	3,190	6,861
Intangible assets	13	-	-	13	-
Tangible assets	4	-	-	1	3
Income tax	-	-	-	-	-
Derivative assets	-11,338	119	-186	-1,689	-9,582
Other assets	91	81	1	-	9
Prepayments and accrued income	-	-	-	-	-
Total assets as at 31 December 2025	93,466	3,921	5,752	20,484	63,309
LIABILITIES					
Debts to credit institutions	5,524	628	63	552	4,281
Funds entrusted	7,492	169	255	216	6,852
Debt securities	70,530	1,479	8,397	28,205	32,449
Subordinated debt	336	52	260	3	21
Derivative liabilities	7,472	270	161	756	6,285
Pension provision	2	-	-	-	2
Provision for deferred income tax	6	-	-	6	-
Income tax	3	3	-	-	-
Other liabilities	19	13	6	-	-
Accruals	9	6	3	-	-
Equity	2,157	-	-	-	2,157
Total liabilities as at 31 December 2025	**93,550**	**2,620**	**9,145**	**29,738**	**52,047**
(x EUR 1,000,000)					

	Total	<3 months	3-12 months	1-5 years	>5 years
31 December 2024					
ASSETS					
Cash, cash equivalents and deposits at the Central Bank	6,623	6,623	-	-	-
Loans and advances to credit institutions	2,622	28	22	67	2,505
Loans and receivables	86,327	1,448	5,861	17,762	61,256
Interest-bearing securities	7,111	-104	55	2,532	4,628
Intangible assets	11	-	-	11	-
Tangible assets	4	-	-	1	3
Income tax	-	-	-	-	-
Derivative assets	4,204	479	740	1,379	1,606
Other assets	25	16	-	-	9
Prepayments and accrued income	-	-	-	-	-
Total assets as at 31 December 2024	**106,927**	**8,490**	**6,678**	**21,752**	**70,007**
LIABILITIES					
Debts to credit institutions	5,397	663	63	548	4,123
Funds entrusted	7,826	138	478	190	7,020
Debt securities	74,063	5,362	11,036	23,484	34,181
Subordinated debt	338	3	208	105	22
Derivative liabilities	19,489	288	544	2,831	15,826
Pension provision	3	-	-	-	3
Provision for deferred income tax	7	-	-	7	-
Income tax	-	-	-	-	-
Other liabilities	20	16	4	-	-
Accruals	6	3	3	-	-
Equity	2,094	-	-	-	2,094
Total liabilities as at 31 December 2024	**109,243**	**6,473**	**12,336**	**27,165**	**63,269**

Liquidity Coverage Ratio

One of the limits relates to the Liquidity Coverage Ratio (LCR), a liquidity ratio set out in CRD IV/CRR (Capital Requirements Directive IV/Capital Requirements Regulation) to which a minimum requirement of 100% applies. The LCR measures whether there are sufficient liquid assets to meet obligations in the short term. The internal LCR limit is higher than the minimum requirement. The LCR was 235% at the balance sheet date (2024: 183%).

Net Stable Funding Ratio

The Net Stable Funding Ratio (NSFR) shows the ratio between the available and required amount of stable funding, whereby a distinction is made between products with shortand long-term maturities and off-balance sheet items.

The NSFR encourages the use of long-term funding for long-term loans, or matched financing. For the NSFR, a minimum requirement of 100% applies. At year-end 2025, NWB Bank met this requirement with a ratio at balance sheet date of 148% (2024: 134%).

ESG risk

ESG stands for environmental, social and governance. We define ESG risk, including climate risk, as the risk that ESG factors could negatively impact the strategic objectives, capital position and/or profit of our bank. The concept of double materiality is part of this definition, meaning we consider not only the impact of ESG risks on the bank but also the impact of our lending activities on people and the environment, which in turn may affect the bank. ESG factors manifest themselves in both financial and non-financial risks.

The ESG risk management cycle is the framework of processes and procedures designed to identify, assess, mitigate and monitor ESG risks. This annual cycle starts with the ESG risk identification and risk materiality assessment (RMA), where we identify the material ESG risks for the bank. For this risk identification and assessment, we use scientific sources, ESG data that we collect ourselves, input from clients (external stakeholders) and input from stakeholder workshops with internal experts. The assessment leads to the identification of material ESG risks in the short, medium and long term. We then assess the impact on the bank's traditional risk categories through the so-called transmission channels. We anticipate a potential material impact on, in particular, credit risk. Drought can damage the foundations of social housing and reduce the credit quality of housing associations. Otherwise, for example, reputational damage in the water sector or the bank's inadequate response to ESG and sustainability developments may make it difficult to achieve our strategic objectives.

Material ESG risks are further managed through the risk management cycle. An important part of this is the collection of ESG data, which we use to further quantify and monitor ESG risks. We conduct quantitative stress testing, focusing on the short term, and qualitative scenario analysis, focusing on the medium and long term. Stress tests are conducted annually as part of ICAAP, the general annual risk assessment process for significant financial institutions, to examine and quantify the impact of ESG risks on the balance sheet. We develop scenarios based on scientific reports from the Network for Greening the Financial System (NGFS), the Intergovernmental Panel on Climate Change (IPCC) and the Royal Netherlands Meteorological Institute (KNMI).

To monitor risk factors, we have defined a set of ESG key risk indicators (KRIs), which we report on and discuss in various committees within the bank. The KRIs relate to the overall CO_2e reduction of the portfolio, energy labelling in housing association portfolios, nature in communities and various water authority targets. We evaluate the KRIs annually and adjust or expand them as necessary. The KRIs enable us to assess our clients' performance and, if necessary, take action through engagement. At the client level, we have incorporated ESG risks into the scorecards for various client groups, with

a credit risk score determined for each individual client. In addition, potential ESG risks are explained and assessed in credit analyses and reviews.

Prudential supervision

The bank is under the direct prudential supervision of the European Central Bank (ECB). The ECB conducts supervision jointly with the Dutch Central Bank (De Nederlandsche Bank – DNB), the national supervisor of the banking sector, as part of a Joint Supervisory Team (JST). Supervision has intensified in recent years. In the interests of both parties, the JST must have a good understanding of both the specific profile and business model and the bank's risk management system. Clear and efficient lines of communication to the supervisory authority are also important.

The Supervisory Review and Evaluation Process (SREP) takes place every year, during which the supervisor assesses the bank's risks. The SREP decision, which the bank receives from the supervisor at the end of the process, sets out the main objectives the bank must achieve to address the identified issues. Moreover, last year, as part of its supervisory task, the ECB conducted an on-site inspection on Risk Data Aggregation and Risk Reporting (RDARR) and carried out a review ('deep dive') into the functioning of the guarantees applied by the bank, including the guarantee funds. The final outcomes of the on-site inspection and the deep dive are not yet known at the time of writing. In 2025, NWB Bank also participated in the European sector-wide stress test.

Last year, the bank also updated its Recovery Plan and submitted it to the ECB and DNB. Starting in 2023, we are updating this recovery plan every two years. It sets out the measures a bank can take in a situation of severe stress and how the bank can subsequently achieve recovery. A key part of the Recovery Plan is the set of recovery triggers that may prompt the bank to take action. These recovery triggers are consistent with our risk appetite. Every bank is required to have such a plan. NWB Bank believes it is important to carefully consider the crisis management organisation and the recovery measures available in such extreme circumstances.

Besides the Single Supervisory Mechanism (SSM), which governs the prudential supervision of European banks, the formation of a banking union in Europe comprises a second and third pillar. The second pillar is the Single Resolution Mechanism (SRM), comprising the Single Resolution Board (SRB) and the national resolution authorities, which is responsible for the recovery and resolution of banks. The third pillar is the Deposit Guarantee Scheme (DGS), under which rules are laid down regarding banks' guarantee obligations towards depositors. Of these two other pillars, the second pillar is particularly relevant to NWB Bank. With the entry into force of the Bank Recovery and Resolution Directive (BRRD) in 2015, the bank also has to deal with the SRB, which is responsible for an orderly process surrounding the recovery and possible resolution of a bank. The SRB adopts a resolution strategy for each bank. In late 2020, the SRB decided it will continue to apply a so-called simplified obligations plan in the case of NWB Bank. As a result, any insurmountable difficulties faced by the bank would be resolved through the national insolvency proceedings. In 2025, the SRB reconfirmed that this plan is still applicable.

Capital requirements

The implementation of CRR3 (Capital Requirements Regulation III) took effect in 2025. As part of the EU banking package, CRR3 aims to strengthen financial stability by increasing capital requirements for banks and improving risk assessment. It is intended to strengthen banks' capital buffers and enhance risk management. One element of this is adjusting risk weights in the Standardised Approach (SA) for credit risk.

Unlike the ICAAP, which covers all risk categories, the minimum capital requirements (as stipulated in the Banking Directive or the Capital Requirements Directive) relate to

credit risk, market risk and operational risk. The bank uses different methods for these three types of risk.

Credit risk

NWB Bank uses the standardised method for general credit risk. In addition, there is the capital for counterparty risk, for which the standardised method is used. The capital requirement according to the Credit Valuation Adjustment (CVA) is additional to the capital requirement for counterparty default risk. This capital requirement is calculated using a standard formula based on exposure, rating and average term of derivatives positions entered into with counterparties, among other things.

Market risk

Market risk concerns the bank's currency risks. Due to NWB Bank's stringent policy on currency risk, on balance, there are no outstanding currency positions. Therefore, the capital that is to be reserved to cover market risk is nil.

Operational risk

When calculating qualifying capital for operational risk, NWB Bank uses the standardised approach. Under this approach, 15% of the relevant indicator is taken as a benchmark for the operational risk. The relevant indicator at the end of 2025 under the CRR3 regulation is the three-year average of the total of the annual net interest income and the annual net non-interest income at the end of the financial year. The relevant indicator at the end of 2024 was the three-year average of the sum of the annual net interest income and the annual net non-interest income at year-end.

The calculation of the Tier 1 ratio as at the reporting date is as follows.

(x EUR 1,000,000)	**2025**	2024
Equity excluding profit for the current financial year	2,044	2,000
Intangible assets	-13	-11
Prudential filters	-9	-11
CET1 capital	2,022	1,978
Additional Tier 1 capital	327	321
Tier 1 capital (A)	**2,349**	**2,299**
Weighted credit risk (SA)[1)]	3,994	3,858
Capital requirement pursuant to CVA (BA SA)[2)]	1,090	1,202
Weighted operational risk (SA)[1)]	406	489
Risk-weighted assets (B)	**5,490**	**5,549**
Tier 1-ratio (A/B)	**43%**	**41%**

1) Standardised Approach
2) 2025: Basic Approach and 2024: Standardised Approach

At the end of 2025, visible equity totalled €2,044 million (excluding profit for the current financial year) compared to €2,000 million at year-end 2024 (excluding profit for the current financial year). CET1 capital, including Additional Tier 1 capital, amounted to €2,349 million at year-end 2025 (excluding profit for the current financial year) compared to €2,299 million at year-end 2024 (excluding profit for the current financial year). The bank's total risk-weighted assets decreased from €5,549 million at year-end 2024 to €5,422 million at year-end 2025. This decrease is mainly due to a lower capital requirement for CVA resulting from reduced bilateral exposure to a derivatives counterparty. The item 'Prudential filters and other' includes IPCs relating to the SRB amounting to €9.2 million (2024: €9.2 million), which must be deducted from capital in accordance with the applicable regulations (CRR).

The ECB conducted a regular SREP again in 2025, in which the capital requirements for NWB Bank were reassessed. The bank-specific Pillar 2 capital requirement remained the same at 2.25%. The total SREP capital requirement for NWB Bank is 10.25%. This is the sum of the total Pillar 1 capital requirement of 8% and the Pillar 2 capital requirement of 2.25%. Together with the required capital conservation buffer of 2.5% and the countercyclical capital buffer of 1.95%, the total capital requirement for the bank amounts to 14.71%.

Leverage ratio

The implementation of CRR II has introduced a leverage ratio requirement of 3%. CRR II provides certain adjustments to exposures that must be included in the ratio calculation. Public development credit institutions, such as NWB Bank, can exclude exposures related to the financing of public sector investments. The leverage ratio at the balance sheet date, including cash, cash equivalents and deposits at the Central Bank, was 39.2% (2024: 24.0%) (excluding profit for the financial year) .

Additional information about NWB Bank's risk management policy can be found in the Pillar 3 reports at www.nwbbank.com/en/about-nwb-bank/publications. These reports are not part of the audit.

36 EVENTS AFTER THE BALANCE SHEET DATE

At the time of preparing the financial statements, there were no significant events after the balance sheet date that require disclosure.

37 PROPOSED PROFIT APPROPRIATION

The profit for the reporting year amounted to €112.5 million (2024: €93.7 million). The share of profit available for dividend has been set at €53 million (2024: €50 million) by the Managing Board and Supervisory Board. This decision was made in accordance with Article 21 of the Articles of Association.

		2025		2024
(x EUR 1,000)				
Profit for the year		**112,547**		**93,694**
The proposed profit appropriation is as follows:				
Cash dividends on A shares	777%	45,087	733%	42,535
Cash dividends on B shares	777%	7,913	733%	7,465
		53,000		**50,000**
Added to the reserves on the approval of the Supervisory Board		59,547		43,694
		112,547		**93,694**

The dividend proposed in the 2025 and 2024 financial statements adopted by the Annual General Meeting is recognised in other reserves.

38 MANAGING BOARD AND SUPERVISORY BOARD

Managing Board

Lidwin van Velden
Ard van Eijl
Elvira Eurlings

Supervisory Board

Joanne Kellermann
André ten Damme
Geert Embrechts
Toon van der Klugt
Caroline Oosterloo
Maarten Otto
Annette Ottolini

The Hague, 23 March 2026

OTHER INFORMATION

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INDEPENDENT AUDITOR'S REPORT

The following is an English translation of the independent auditor's report issued 23 March 2026.

To: the shareholders and supervisory board of Nederlandse Waterschapsbank N.V.

REPORT ON THE AUDIT OF THE FINANCIAL STATEMENTS 2025 INCLUDED IN THE ANNUAL REPORT

Our opinion

We have audited the accompanying 2025 financial statements of Nederlandse Waterschapsbank N.V. based in The Hague.

In our opinion, the financial statements give a true and fair view of the financial position of Nederlandse Waterschapsbank N.V. as at 31 December 2025 and of its result for 2024 in accordance with Part 9 of Book 2 of the Dutch Civil Code.

The financial statements comprise:

- The balance sheet as at 31 December 2025
- The statement of income for the year ending on 31 December 2025
- The notes comprise a summary of the accounting policies and other explanatory information

Basis for our opinion

We conducted our audit in accordance with Dutch law, including the Dutch Standards on Auditing. Our responsibilities under those standards are further described in the Our responsibilities for the audit of the financial statements section of our report.

We are independent of Nederlandse Waterschapsbank N.V. in accordance with the EU Regulation on specific requirements regarding statutory audit of public-interest entities, the Wet toezicht accountantsorganisaties (Wta, Audit firms supervision act), the Verordening inzake de onafhankelijkheid van accountants bij assurance-opdrachten (ViO, Code of Ethics for Professional Accountants, a regulation with respect to independence) and other relevant independence regulations in the Netherlands. Furthermore, we have complied with the Verordening gedrags- en beroepsregels accountants (VGBA, Dutch Code of Ethics for Professional Accountants).

We believe the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

INFORMATION IN SUPPORT OF OUR OPINION

We designed our audit procedures in the context of our audit of the financial statements as a whole and in forming our opinion thereon. The following information in support of our opinion and any findings were addressed in this context, and we do not provide a separate opinion or conclusion on these matters.

Our understanding of Nederlandse Waterschapsbank N.V.

Nederlandse Waterschapsbank N.V. ('NWB Bank' or the company) is a national promotional bank and a lender to the public sector in the Netherlands, providing financing to water authorities, municipalities and provinces as well as to other public sector institutions such as housing associations and healthcare institutions which are guaranteed (indirectly) by the Dutch State. NWB Bank is also involved in financing Public-Private Partnerships (PPP), renewable energy projects and government-backed export financing. We have paid specific attention in our audit to a number of areas driven by the operations of NWB Bank and our risk assessment.

We have determined materiality and identified and assessed the risks of material misstatement of the financial statements, whether due to fraud or error in order to design audit procedures responsive to those risks and to obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion.

Materiality

Materiality	€ 21 million (2024: € 20 million)
Benchmark applied	1% of equity as per 31 December 2025
Explanation	Based on our professional judgment, a benchmark of 1% of shareholder's equity is an appropriate quantitative indicator of materiality as it best reflects the financial position of NWB Bank. We determined materiality consistently with the previous financial year.

We have also taken into account misstatements and/or possible misstatements that in our opinion are material for the users of the financial statements for qualitative reasons.

We agreed with the supervisory board that misstatements in excess of €1 million, which are identified during the audit, would be reported to them, as well as smaller misstatements that in our view must be reported on qualitative grounds.

Teaming and use of specialists

We ensured that the audit included the appropriate skills and competences which are needed for the audit of a bank. We included specialists in the areas of IT audit, forensics and corporate income tax. We have made use of our own experts in the areas of modelling for loan loss provision, valuations of derivates, hedge accounting and capital requirements.

Our focus on climate-related risks and the energy transition

Climate change and the energy transition are high on the public agenda and lead to significant change for many businesses and society. The Managing Board summarized the NWB Bank's commitments and obligations, and reported in the section "The Sustainable Water Bank: results and impact 2025" of the management report how the company is addressing climate-related and environmental risks also taking into account related regulatory and supervisory ESG risk management guidelines and expectations.

As part of our audit of the financial statements, we evaluated the extent to which climate-related risks and the effects of the energy transition and the NWB Bank's commitments and (constructive) obligations, are taken into account in estimates and significant assumptions. Furthermore, we read the management report and considered whether there is any material inconsistency between the non-financial information and the financial statements.

Based on the audit procedures performed, we do not deem climate-related risks to have a material impact on the financial reporting judgements, estimates or significant assumptions as at 31 December 2025.

Our focus on fraud and non-compliance with laws and regulations

Our responsibility

Although we are not responsible for preventing fraud or non-compliance and we cannot be expected to detect non-compliance with all laws and regulations, it is our responsibility to obtain reasonable assurance that the financial statements, taken as a whole, are free from material misstatement, whether caused by fraud or error. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

Our audit response related to fraud risks

We identified and assessed the risks of material misstatements of the financial statements due to fraud. During our audit we obtained an understanding of the NWB Bank and its environment and the components of the system of internal control, including the risk assessment process and the managing board's process for responding to the risks of fraud and monitoring the system of internal control and how the supervisory board exercises oversight, as well as the outcomes. We refer to the Risk Management section in the chapter Corporate Governance of the annual report for the managing board's (fraud) risk assessment.

We evaluated the design and relevant aspects of the system of internal control and in particular the fraud risk assessment, as well as the code of conduct, whistle blower procedures and incident registration. We evaluated the design and the implementation of internal controls designed to mitigate fraud risks.

As part of our process of identifying fraud risks, we evaluated fraud risk factors with respect to financial reporting fraud, misappropriation of assets and bribery and corruption in collaboration with our forensics specialists. We evaluated whether these factors indicate that a risk of material misstatement due to fraud is present.

We incorporated elements of unpredictability in our audit. We also considered the outcome of our other audit procedures and evaluated whether any findings were indicative of fraud or non-compliance.

We addressed the risks related to management override of controls, as this risk is present in all organizations. For these risks we have performed procedures among other things to evaluate key accounting estimates for management bias that may represent a risk of material misstatement due to fraud, in particular relating to important judgement areas and significant accounting estimates as disclosed in section 'Significant assumptions and estimation uncertainties' in chapter Basis of preparation of the financial statements. We have also used data analysis to identify and address high-risk journal entries and evaluated the business rationale (or the lack thereof) of significant extraordinary transactions.

Furthermore, as described in our key audit matter Credit quality loan portfolio and expected credit loss provision we have among other things evaluated judgement and estimates that may pose a risk of a material misstatement due to fraud.

When identifying and assessing fraud risks we presumed that there are risks of fraud in revenue recognition. We considered among other things the NWB Bank's loans for which there is an extension of the maturity or early redemption with simultaneous origination of a new loan particularly give rise to these risks. The evaluation of whether there is a new loan to be recognized determines the accounting for the result of these transactions. This evaluation is complex and may contain subjective elements, as further explained in paragraph 2 Results financial transaction in the annual report. We have designed and executed our audit procedures regarding the processing of the results from these transactions as a response to this assumed fraud risk.

In doing so, we focused on evaluating the managing board's assessment and to what extent the expected, newly agreed cash flows substantially deviate from those based on the previous agreement. In this context, we evaluated, among others, whether the managing board's assessment was carried out consistently.

We considered available information and made enquiries of relevant executives, directors, internal audit, legal, compliance, human resources and regional directors and the supervisory board.

The fraud risks we identified, enquiries and other available information did not lead to specific indications for fraud or suspected fraud potentially materially impacting the view of the financial statements.

Our audit response related to risks of non-compliance with laws and regulations

We performed appropriate audit procedures regarding compliance with the provisions of those laws and regulations that have a direct effect on the determination of material amounts and disclosures in the financial statements. Furthermore, we assessed factors related to the risks of non-compliance with laws and regulations that could reasonably be expected to have a material effect on the financial statements from our general industry experience, through discussions with the managing board, inspection of the integrity risk analysis (SIRA), reading minutes, inspection of reports from risk, compliance and internal audit and performing substantive tests of details of classes of transactions, account balances or disclosures.

We also inspected the confirmation letter from the department Legal (internal legal letter) and correspondence with regulatory authorities and remained alert to any indication of (suspected) non-compliance throughout the audit. Finally, we obtained written representations that all known instances of non-compliance with laws and regulations have been disclosed to us.

Our audit response related to going concern

As disclosed in section Going concern in 'Basis of preparation of the financial statements' to the financial statements, the financial statements have been prepared on a going concern basis. When preparing the financial statements, the managing board made a specific assessment of NWB Bank's ability to continue as a going concern and to continue its operations for the foreseeable future. We discussed and evaluated the specific assessment with the managing board exercising professional judgment and maintaining professional skepticism.

We considered whether the managing board's going concern assessment, based on our knowledge and understanding obtained through our audit of the financial statements or otherwise, contains all relevant events or conditions that may cast significant doubt on the NWB Bank's ability to continue as a going concern for which we also evaluated whether the company is able to continue to comply with the legal solvency requirements for credit institutions. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion.

Based on our procedures performed, we did not identify material uncertainties about going concern or the managing board's use of the going concern basis of accounting. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause NWB Bank to cease to continue as a going concern.

Our key audit matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the financial statements. We have communicated the key audit matters to the supervisory board. The key audit matters are not a comprehensive reflection of all matters discussed.

In comparison with previous year, the nature of our key audit matters did not change.

Credit quality loan portfolio and expected credit loss provision

Risk	Loans and receivables are valued at amortised cost using the effective interest method, less a provision for impairment losses (expected credit loss). NWB Bank uses the option, as allowed under Dutch Accounting Standards, to apply the IFRS 9 impairment requirements based on expected credit losses (hereinafter: 'ECL'). Impairment allowances represent NWB Bank's best estimate of expected losses. At 31 December 2025, the loans and receivables amount to € 55.0 billion (2024: € 59.2 billion), net of expected credit loss provision of € 1.2 million (2024: € 0.6 million) as disclosed in paragraph 11 and 32 to the financial statements. The provision for impairment is based on expected credit losses which includes parameters and assumptions such as the probability of default, the loss given default, the allocation of loans to stages and the use of macro-economic scenarios and forward looking information. The appropriateness of loan loss provisions is a key area of judgment for the managing board. The identification of expected credit losses is an inherently uncertain processes involving assumptions and factors including the financial condition of the counterparty and expected future cash flows. As part of our risk assessment, we considered the potential risk of management override of controls and related to the staging and specifically the determination of the internal credit rating for non-guaranteed exposures. Given the inherent complexity of the application of IFRS 9 impairment requirements we considered this to be a key audit matter.
Our audit approach	Our audit procedures included, amongst others, evaluating the application of impairment requirements of IFRS 9 and the appropriateness of NWB Bank's accounting policies related to the expected credit losses according to this standard. We have evaluated whether the applied methods and assumptions used to determine the ECL are suitable and consistently applied. We have obtained an understanding of the loan loss provisioning process and evaluated the design of internal controls across the processes relevant to the expected credit loss calculations as well as performing substantive procedures. This included the allocation of assets into stages, model governance, data accuracy and completeness, multiple economic scenarios, sensitivity analyses, journal entry testing. With the support of our internal modelling specialists, we assessed the adequacy of the provisioning model used by NWB Bank and verified whether the model is adequately designed. We performed an overall assessment of the provision levels by stage to determine if they were reasonable considering the risk profile of the portfolio and credit risk management practices and the macroeconomic environment. We challenged the criteria used to allocate loans to stage 1, 2 or 3 in accordance with IFRS 9 and tested a sample of loans on appropriate staging. We tested the data used in the loan loss provision calculation by reconciliation to source systems. We assessed the base case and alternative economic scenarios. This included challenging probability weights and the severity and magnitude of modelled downside scenarios, assessing the sensitivity of primary drivers in the model calculations, as well as assessing the sensitivity in changes in the internal credit rating. Finally, we evaluated the completeness and accuracy of the disclosures in the financial statements relating to the provision for impairment losses in accordance the requirements of the Dutch Accounting Standards and IFRS 7 on credit risk.
Key observations	Based on our procedures performed we consider the provision for expected credit losses to be reasonable and found that the disclosures relating to the provision for expected credit losses, in all material aspects, meet the requirements of the Dutch Accounting Standards and IFRS 7.

Hedge accounting and fair value measurement of financial instruments

Risk	NWB Bank hedges most interest and foreign exchange risks related to financial assets and liabilities through derivatives. For accounting purposes NWB Bank applies two types of fair value hedge accounting, micro and macro hedging. The application of hedge accounting enables the synchronization of the reported results for the hedging instrument and the hedged position, insofar the hedge is effective and the hedge relation is formally documented. NWB Bank has developed specific models to calculate hedge effectiveness. NWB Bank uses derivatives as hedging instruments, measured at fair value on the balance sheet. Both the fair value adjustments of the hedged position related to the hedged risk and the fair value adjustments of the derivatives are recorded in statement of income as result from financial transactions including any resulting ineffectiveness. For the year ended 31 December 2025 NWB Bank recorded a hedge accounting ineffectiveness as disclosed in paragraph 2 Result from financial transactions in the disclosure for the income statement of € 9.3 million positive (2024: € 2.9 million negative). The fair value measurement of derivatives and associated valuation adjustments can be a subjective area insofar model based valuations are applied due to lower liquidity and limited price availability. NWB Bank has derivatives where no market prices are available, and in these cases, fair value is determined using valuation models based on observable market data. NWB Bank has level 2 derivative assets and derivative liabilities categorized as measurement based on models using market observable data totalling € 5.4 billon and € 3.5 billion respectively (2024: € 4.7 billon and € 3.7 billion respectively) as disclosed in note 33 fair value of financial instruments. The fair value measurement and applied hedge accounting are key audit matter, as they are inherent complexity. highly subjective and based on management judgement.
Our audit approach	Our audit procedures included, amongst others, evaluating the appropriateness of the applied valuation principles with respect to the fair value measurement of derivatives and the application of hedge accounting by NWB Bank in accordance with Dutch Accounting Standard 290 Financial Instruments, whether the used derivatives are eligible for hedge accounting and the appropriateness of the hedge documentation. We have evaluated the design and implementation of internal controls related to the valuation process and the hedge accounting process and tested key controls. We have evaluated the review and approval of assumptions and the methods applied in model-based calculations by the second line of defence, as well as the control of data quality and adjustments of internal models. In our audit we have tested, on a sample basis, whether the hedge documentation meets requirements of Part 9 of Book 2 of the Dutch Civil Code and Dutch Accounting Standard 290. Furthermore, our hedge specialists have been involved to assess whether the hedge relationships are effective, and the hedge effectiveness has been calculated accordingly. With the support of our valuation specialists, we further assessed whether the used assumptions and methods for determining the fair value of the financial instruments, including the valuation of counterparty risk (CVA/DVA) under derivative transactions executed, are appropriate and have been consistently applied. We evaluated the methods in the valuation models against market-accepted valuation guidelines and methods. We also tested the acceptability of the estimates against counterparty valuations and performed our own valuations on a sample basis. Finally, we evaluated the completeness and accuracy of the disclosures in accordance with Dutch Accounting Standard 290 financial instruments.
Key observations	We did not identify any material deviations regarding the application of hedge accounting and the measurement of the fair value of financial instruments as of 31 December 2025.

Reliability and continuity of IT environment

Risk	The activities and financial reporting of NWB Bank are highly dependent on the reliability and continuity of the IT environment. Effective general IT controls with respect to change management, logical access, infrastructure and operations, support the integrity and continuity of the electronic data processing as well as the operating effectiveness of the automated controls. The most important developments and risks related to the IT environment are described in the section Risk Management in chapter Corporate Governance, under Operational Risk. There is a risk that the general IT control measures may not always operate as intended and, as a result, internal controls are ineffective. Therefore, we identified the reliability and continuity of the IT environment as a key audit matter.
Our audit approach	IT audit specialists are an integral part of the engagement team and assess the reliability and continuity of the IT environment to the extent necessary for the scope of our audit of the financial statements. In this context, we evaluated the design of the IT processes, including cybersecurity, and tested the operating effectiveness of general IT controls, as well as application controls over data processing, data feeds and interfaces where relevant for the financial reporting. We performed additional substantive procedures on access management, security event monitoring and segregation of duties for the related systems.
Key observations	Our testing of the general IT controls and the substantive tests performed, provided sufficient evidence to enable us to rely on the IT environment for our audit of the financial statements.

REPORT ON OTHER INFORMATION INCLUDED IN THE ANNUAL REPORT

The annual report contains other information in addition to the financial statements and our auditor's report thereon.

Based on the following procedures performed, we conclude that the other information:

- Is consistent with the financial statements and does not contain material misstatements
- Contains the information as required by Part 9 of Book 2 of the Dutch Civil Code for the management report (excluding the sustainability statement) and the other information as required by Part 9 of Book 2 of the Dutch Civil Code.

We have read the other information. Based on our knowledge and understanding obtained through our audit of the financial statements or otherwise, we have considered whether the other information contains material misstatements. By performing these procedures, we comply with the requirements of Part 9 of Book 2 of the Dutch Civil Code and the Dutch Standard 720. The scope of the procedures performed is substantially less than the scope of those performed in our audit of the financial statements.

The managing board is responsible for the preparation of the other information, including the management report and other information in accordance with Part 9 of Book 2 of the Dutch Civil Code.

DESCRIPTION OF RESPONSIBILITIES REGARDING THE FINANCIAL STATEMENTS

Responsibilities of the managing board and the supervisory board for the financial statements

The managing board is responsible for the preparation and fair presentation of the financial statements in accordance with Part 9 of Book 2 of the Dutch Civil Code. Furthermore, the managing board is responsible for such internal control as the managing board determines is necessary to enable the preparation of the financial statements that are free from material misstatement, whether due to fraud or error.

As part of the preparation of the financial statements, the managing board is responsible for assessing the NWB Bank's ability to continue as a going concern. Based on the financial reporting framework mentioned, the managing board should prepare the financial statements using the going concern basis of accounting unless the managing board either intends to liquidate NWB Bank or to cease operations, or has no realistic alternative but to do so. The managing board should disclose events and circumstances that may cast significant doubt on the NWB Bank's ability to continue as a going concern in the financial statements.

The supervisory board is responsible for overseeing NWB Bank's financial reporting process.

Our responsibilities for the audit of the financial statements

Our objective is to plan and perform the audit engagement in a manner that allows us to obtain sufficient and appropriate audit evidence for our opinion.

Our audit has been performed with a high, but not absolute, level of assurance, which means we may not detect all material misstatements, whether due to fraud or error during our audit.

Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements. The materiality affects the nature, timing and extent of our audit procedures and the evaluation of the effect of identified misstatements on our opinion.

We have exercised professional judgment and have maintained professional skepticism throughout the audit, in accordance with Dutch Standards on Auditing, ethical requirements and independence requirements. The Information in support of our opinion section above includes an informative summary of our responsibilities and the work performed as the basis for our opinion.

Our audit further included among others:

- Performing audit procedures responsive to the risks identified, and obtaining audit evidence that is sufficient and appropriate to provide a basis for our opinion;
- Obtaining an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of NWB Bank's internal control;
- Evaluating the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the managing board;
- Evaluating the overall presentation, structure and content of the financial statements, including the disclosures;
- Evaluating whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

Communication

We communicate with the supervisory board regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant findings in internal control that we identify during our audit.

In this respect we also submit an additional report to the audit committee of the supervisory board in accordance with Article 11 of the EU Regulation on specific requirements regarding statutory audit of public-interest entities. The information included in this additional report is consistent with our audit opinion in this auditor's report.

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

From the matters communicated with the supervisory board, we determine the key audit matters: those matters that were of most significance in the audit of the financial statements. We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, not communicating the matter is in the public interest.

REPORT ON OTHER LEGAL AND REGULATORY REQUIREMENTS AND ESEF

Engagement

We were engaged by the general meeting of shareholders as auditor of NWB Bank on 23 April 2015, as of the audit for the year 2016 and have operated as statutory auditor ever since that date.

No prohibited non-audit services

We have not provided prohibited non-audit services as referred to in Article 5(1) of the EU Regulation on specific requirements regarding statutory audit of public-interest entities.

European Single Electronic Reporting Format (ESEF)

NWB Bank has prepared the annual report in ESEF. The requirements for this are set out in the Delegated Regulation (EU) 2019/815 with regard to regulatory technical standards on the specification of a single electronic reporting format (hereinafter: the RTS on ESEF).

In our opinion the annual report prepared in the XHTML format, including the financial statements as included in the reporting package by NWB Bank, complies in all material respects with the RTS on ESEF.

The managing board is responsible for preparing the annual report, including the financial statements, in accordance with the RTS on ESEF, whereby the managing board combines the various components into a single reporting package.

Our responsibility is to obtain reasonable assurance for our opinion whether the annual report in this reporting package complies with the RTS on ESEF.

We performed our examination in accordance with Dutch law, including Dutch Standard 3950N, "Assurance-opdrachten inzake het voldoen aan de criteria voor het opstellen van een digitaal verantwoordingsdocument" (assurance engagements relating to compliance with criteria for digital reporting). Our examination included amongst others:

- Obtaining an understanding of the NWB Bank's financial reporting process, including the preparation of the reporting package
- Identifying and assessing the risks that the annual report does not comply in all material respects with the RTS on ESEF and designing and performing further assurance procedures responsive to those risks to provide a basis for our opinion, including:
  - Obtaining the reporting package and performing validations to determine whether the reporting package containing the Inline XBRL instance document and the XBRL extension taxonomy files, has been prepared in accordance with the technical specifications as included in the RTS on ESEF
  - Examining the information related to the consolidated financial statements in the reporting package to determine whether all required mark-ups have been applied and whether these are in accordance with the RTS on ESEF.

Amsterdam, 23 March 2026

EY Accountants B.V.

Signed by R. Koekkoek

LIMITED ASSURANCE REPORT OF THE INDEPENDENT AUDITOR ON THE SUSTAINABILITY STATEMENT

The following is an English translation of the assurance report of the independent auditor issued 23 March 2026.

TO: THE SHAREHOLDERS AND THE SUPERVISORY BOARD OF NEDERLANDSE WATERSCHAPSBANK N.V.

Our conslusion

We have performed a limited assurance engagement on the sustainability statement for 2025 of Nederlandse Waterschapsbank N.V. based in The Hague (hereinafter: NWB Bank) in section Sustainability Statements of the accompanying management report including the information incorporated in the sustainability statement by reference (hereinafter: the sustainability statement).

Based on our procedures performed and the evidence obtained, nothing has come to our attention that causes us to believe that the sustainability statement is not, in all material respects:

- prepared in accordance with the European Sustainability Reporting Standards (ESRS) as adopted by the European Commission and compliant with the double materiality assessment process carried out by NWB Bank to identify the information reported pursuant to the ESRS; and
- compliant with the reporting requirements provided for in Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation).

Our conclusion has been formed on the basis of the matters outlined in this limited assurance report.

Basis for our conslusion

We have performed our limited assurance engagement on the sustainability statement in accordance with Dutch law, including Dutch Standard 3810N, "Assurance-opdrachten inzake duurzaamheidsverslaggeving" (Assurance engagements relating to sustainability reporting), which is a specified Dutch standard that is based on the International Standard on Assurance Engagements (ISAE) 3000 (Revised), "Assurance engagements other than audits or reviews of historical financial information".

Our assurance engagement was aimed to obtain a limited level of assurance that the sustainability statement is free from material misstatements. The procedures vary in nature and timing from, and are less in extent, than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Our responsibilities in this regard are further described in the section 'Our responsibilities for the limited assurance engagement on the sustainability statement' of our report.

We are independent of Nederlandse Waterschapsbank N.V. in accordance with the Verordening inzake de onafhankelijkheid van accountants bij assurance-opdrachten (ViO, Code of Ethics for Professional Accountants, a regulation with respect to independence) and other relevant independence regulations in the Netherlands. This includes that we do not perform any activities that could result in a conflict of interest with our independent assurance engagement and we are not involved in the preparation of the sustainability statement, as doing so may compromise our independence. Furthermore, we have complied with the Verordening gedrags- en beroepsregels accountants (VGBA, Dutch Code of Ethics for Professional Accountants).

The ViO and VGBA are at least as demanding as the International code of ethics for professional accountants (including International independence standards) of the International Ethics Standards Board for Accountants (the IESBA Code) as relevant to limited assurance engagements on sustainability statements of public interest entities in the European Union.

We believe that the assurance evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Inherent limitations associated with measurement or evaluation of sustainability information

Significant uncertainties affecting the quantitative metrics and monetary amounts.

Section 'Methodology and estimates' in the sustainability statement identifies the quantitative metrics and monetary amounts that are subject to a high level of measurement uncertainty and discloses information about the sources of measurement uncertainty and the assumptions, approximations and judgements NWB Bank has made in measuring these in compliance with the ESRS.

Comparability may be limited for entity-specific sustainability information

NWB Bank provides additional entity-specific sustainability information in Sections '**Energy**', '**Water Management**', '**Biodiversity**', '**Social Housing**' and '**Financial & Economic Crime**'. The comparability of entity-specific sustainability information between entities and over time may be affected by the absence of a uniform practice or availability of external information sources to measure or evaluate this information that can support comparability. This allows for the application of different, but acceptable, measurement techniques.

Inherent limitations of a double materiality assessment process

The sustainability statement may not include every impact, risk and opportunity or additional entity-specific disclosure that each individual stakeholder (group) may consider important in its own particular assessment.

Inherent limitations of forward-looking information

In reporting forward-looking information in accordance with the ESRS, the executive committee describes the underlying assumptions and methods of producing the information, as well as other factors that provide evidence that it reflects the actual plans or decisions made by NWB Bank (actions). Forward-looking information relates to events and actions that have not yet occurred and may never occur. The actual outcome is likely to be different since anticipated events frequently do not occur as expected.

Responsibilities of the executive committee and the supervisory board for the sustainability statement

The executive committee is responsible for the preparation of the sustainability statement in accordance with the ESRS, including the double materiality assessment process carried out by NWB Bank as the basis for the sustainability statement and disclosure of material impacts, risks and opportunities in accordance with the ESRS. As part of the preparation of the sustainability statement, the executive committee is responsible for compliance with the reporting requirements provided for in Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation).

The executive committee is also responsible for selecting and applying additional entity-specific disclosures to enable users to understand NWB Bank's sustainability-related impacts, risks or opportunities and for determining that these additional entity-specific disclosures are suitable in the circumstances and in accordance with the ESRS.

Furthermore, the executive committee is responsible for such internal control as it determines is necessary to enable the preparation of the sustainability statement that is free from material misstatement, whether due to fraud or error.

The supervisory board is responsible for overseeing the sustainability reporting process including the double materiality assessment process carried out by NWB Bank.

Our responsibilities for the limited assurance engagement on the sustainability statement

Our responsibility is to plan and perform the limited assurance engagement in a manner that allows us to obtain sufficient and appropriate assurance evidence for our conclusion.

We apply the applicable quality management requirements pursuant to the Nadere voorschriften kwaliteitsmanagement (NVKM, regulations for quality management) and the International Standard on Quality Management (ISQM) 1, and accordingly maintain a comprehensive system of quality management including documented policies and procedures regarding compliance with ethical requirements, professional standards and other relevant legal and regulatory requirements.

Our limited assurance engagement included amongst others:

- Performing inquiries and an analysis of the external environment and obtaining an understanding of relevant sustainability themes and issues, the characteristics of NWB Bank, its activities and the value chain and its key intangible resources in order to assess the double materiality assessment process carried out by NWB Bank as the basis for the sustainability statement and disclosure of all material sustainability-related impacts, risks and opportunities in accordance with the ESRS
- Obtaining through inquiries a general understanding of the internal control environment, NWB Bank's processes for gathering and reporting entity-related and value chain information, the information systems and NWB Bank's risk assessment process relevant to the preparation of the sustainability statement and for identifying NWB Bank's activities, determining eligible and aligned economic activities and prepare the disclosures provided for in Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation), without obtaining assurance information about the implementation or testing the operating effectiveness of controls
- Assessing the double materiality assessment process carried out by NWB Bank and identifying and assessing areas of the sustainability statement, including the disclosures provided for in Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation), where misleading or unbalanced information or material misstatements, whether due to fraud or error, are likely to arise ('selected disclosures'). Designing and performing further assurance procedures aimed at assessing that the sustainability statement is free from material misstatements responsive to this risk analysis.
- Considering whether the description of the double materiality assessment process in the sustainability statement made by the executive committee appears consistent with the process carried out by NWB Bank
- Performing analytical review procedures on quantitative information in the sustainability statement, including consideration of data and trends
- Assessing whether NWB Bank's methods for developing estimates are appropriate and have been consistently applied for selected disclosures. We considered data and trends, however our procedures did not include testing the data on which the estimates are based or separately developing our own estimates against which to evaluate the executive committee's estimates
- Analyzing, on a limited sample basis, relevant internal and external documentation available to NWB Bank (including publicly available information or information from actors throughout its value chain) for selected disclosures
- Reading the other information in the annual report to identify material inconsistencies, if any, with the sustainability statement

- Considering whether the disclosures provided to address the reporting requirements provided for in Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation) for each of the environmental objectives, reconcile with the underlying records of NWB Bank and are consistent or coherent with the sustainability statement, appear reasonable, in particular whether the eligible economic activities meet the cumulative conditions to qualify as aligned and whether the technical screening criteria are met, and whether the key performance indicators disclosures have been defined and calculated in accordance with the Taxonomy delegated acts, and comply with the reporting requirements provided for in Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation), including the format in which the activities are presented
- Considering the overall presentation, structure and fundamental qualitative characteristics of information (relevance and faithful representation: complete, neutral and accurate) reported in the sustainability statement, including the reporting requirements provided for in Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)
- Considering, based on our limited assurance procedures and evaluation of the evidence obtained, whether the sustainability statement as a whole, is free from material misstatements and prepared in accordance with the ESRS.

Communication

We communicate with the supervisory board regarding, among other matters, the planned scope and timing of the assurance engagement and significant findings that we identify during our assurance engagement.

Amsterdam, 23 March 2026

EY Accountants B.V.

Signed by R. Koekkoek

ARTICLES OF ASSOCIATION PROVISIONS GOVERNING PROFIT APPROPRIATION

The appropriation of profit is governed by Article 21 of the Articles of Association, which reads as follows:

Article 21

1. Profit shall be distributed only insofar as the shareholders' equity of the company exceeds the amount of that part of its issued capital which is paid up and called up, plus the reserves which must be kept by law or the Articles of Association.

2. The annual profit disclosed in the adopted statement of income shall be allocated as follows:
   a. The Managing Board is authorised, subject to the prior approval of the Supervisory Board, to appropriate all or part of the profit to reserves.
   b. Any balance of profit remaining after the addition to reserves shall be at the disposal of the shareholders in general meeting.
   c. To the extent that the shareholders in general meeting do not decide to distribute a dividend for any financial year, such profit shall be added to reserves.

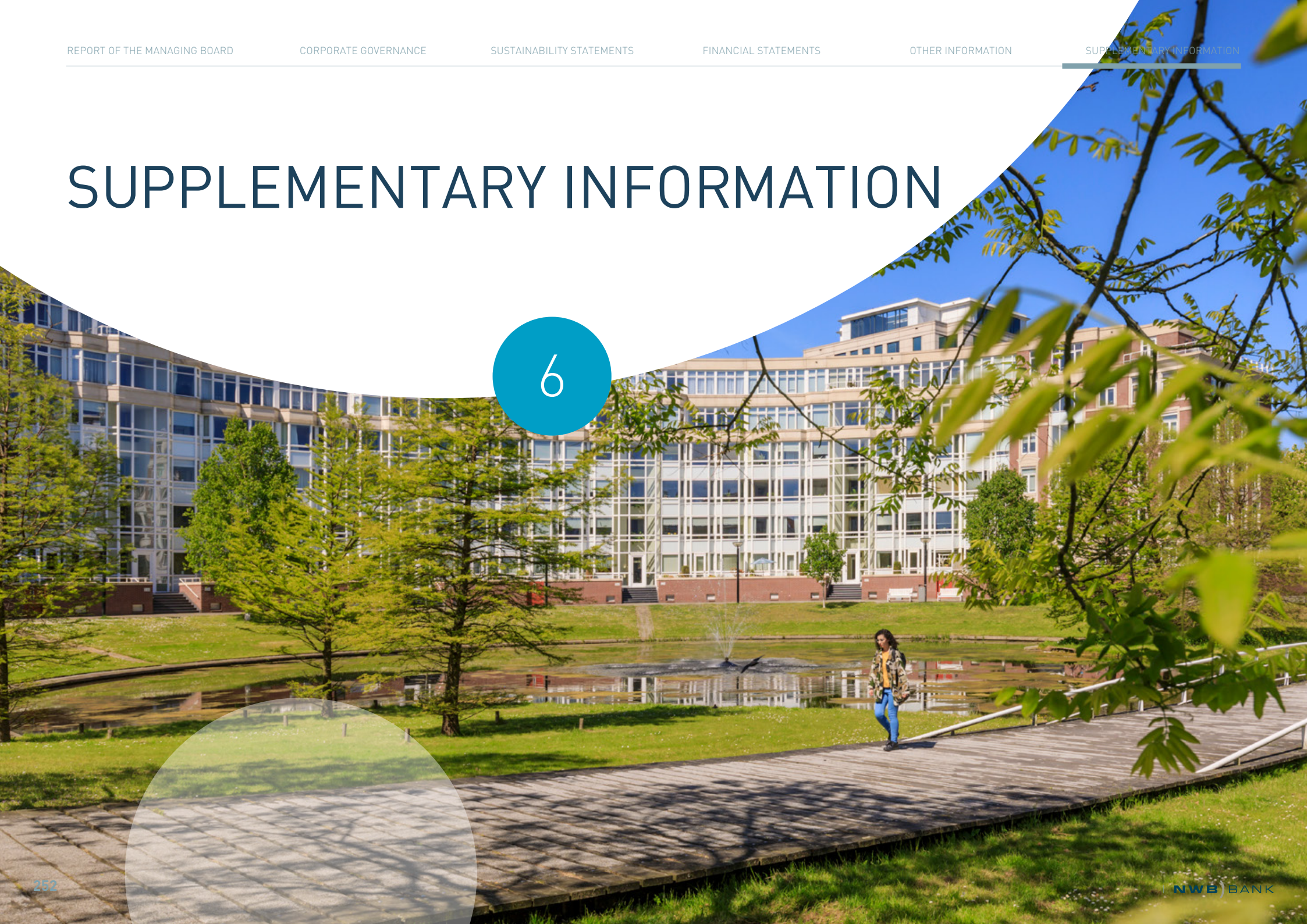
3. The shareholders in general meeting can decide to make a profit distribution chargeable to a distributable reserve only on the basis of a resolution proposed by the Managing Board and approved by the Supervisory Board.

4. To the extent that the company has profit the Managing Board, subject to the approval of the Supervisory Board, may with due regard for the provisions of paragraphs 1 and 2 of this article resolve to distribute an interim dividend on the basis of an interim statement of the company's financial position as provided for in Section 105, subsection 4 of Book 2 of the Dutch Civil Code.

5. On a resolution proposed by the Managing Board, with the approval of the Supervisory Board, the shareholders in general meeting can decide to distribute to shareholders a dividend or interim dividend other than in cash chargeable to the part of the profit to which they are entitled.

SUPPLEMENTARY INFORMATION

6



TAXONOMY TABLES

EU-TAXONOMY: NUCLEAR AND FOSSIL GAS-RELATED ACTIVITIES

	31 december 2025		31 december 2024	
	CAPEX	Turnover	CAPEX	Turnover
Nuclear energy related activities				
The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	No	No	No	No
The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	No	No	No	No
The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purpose of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	No	No	No	No
Fossil gas related activities				
The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	No	No	No	No
The undertaking carries out, funds or has exposures to construction, refurbishment and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	No	No	No	No
The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	No	No	No	No

EU-TAXONOMY TEMPLATE 2: ASSETS FOR GAR CALCULATION

31 DECEMBER 2025 TURNOVER-BASED

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t
		Dec-25																			
			Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					(WTR)	(CE)	(PPC)	(BIO)	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
				Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)									Of which environmentally sustainable (Taxonomy-aligned)				
		Total (gross) carrying amount			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling							Of which Use of Proceeds	Of which transitional	Of which enabling
	GAR - Covered assets in both numerator and denominator																				
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	8,303,253,287	3,639,744,906	220,046,618	126,710,831	945,621	393,882	2,002,311	14,810	-	-	-	13,677	141,520	214,277	2,939	3,642,119,630	220,061,428	126,710,831	945,621	393,882
2	**Financial corporations**	6,062,092,040	3,513,034,075	93,335,786	-	945,621	393,882	2,002,311	14,810	-	-	-	13,677	141,520	214,277	2,939	3,515,408,799	93,350,597	-	945,621	393,882
3	Credit institutions	2,887,095,007	362,459,821	93,335,786	-	945,621	393,882	2,002,311	14,810	-	-	-	13,677	141,520	214,277	2,939	364,834,545	93,350,597	-	945,621	393,882
4	Loans and advances	1,748,278,858	121,597,270	52,066,959	-	878,986	373,859	2,002,311	14,810	-	-	-	5,878	127,871	200,628	2,939	123,936,899	52,081,769	-	878,986	373,859
5	Debt securities, including UoP	1,138,816,149	240,862,551	41,268,827	-	66,634	20,023	-	-	-	-	-	7,799	13,648	13,648	-	240,897,646	41,268,827	-	66,634	20,023
6	Equity instruments	-	-	-		-	-	-	-		-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	3,174,997,033	3,150,574,254	-	-	-	-	-	-	-	-	-	-	-	-	-	3,150,574,254	-	-	-	-
8	of which investment firms	3,174,997,033	3,150,574,254	-	-	-	-	-	-	-	-	-	-	-	-	-	3,150,574,254	-	-	-	-
9	Loans and advances	24,422,779	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	3,150,574,254	3,150,574,254	-	-	-	-	-	-	-	-	-	-	-	-	-	3,150,574,254	-	-	-	-
11	Equity instruments	-	-	-		-	-	-	-		-	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-		-	-	-	-		-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-		-	-	-	-		-	-	-	-	-	-	-	-	-	-	-
20	**Non-financial corporations**	2,241,161,247	126,710,831	126,710,831	126,710,831	-	-	-	-	-	-	-	-	-	-	-	126,710,831	126,710,831	126,710,831	-	-
21	Non-financial corporations (subject to NFRD disclosure obligations)	2,241,161,247	126,710,831	126,710,831	126,710,831	-	-	-	-	-	-	-	-	-	-	-	126,710,831	126,710,831	126,710,831	-	-
22	Loans and advances	1,909,219,669	126,710,831	126,710,831	126,710,831	-	-	-	-	-	-	-	-	-	-	-	126,710,831	126,710,831	126,710,831	-	-
23	Debt securities, including UoP	331,941,578	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Equity instruments	-	-	-		-	-	-	-		-	-	-	-	-	-	-	-	-	-	-
25	**Households**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t
26	of which loans collateralised by residential immovable property	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29	**Local governments financing**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Other local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
32	**Assets excluded from the numerator for GAR calculation (covered in the denominator)**	45,744,310,167	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
33	**Financial and Non-financial undertakings**	39,143,142,733																			
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	39,143,142,733																			
35	Loans and advances	39,143,142,733																			
36	of which loans collateralised by commercial immovable property	-																			
37	of which building renovation loans	-																			
38	Debt securities	-																			
39	Equity instruments	-																			
40	Non-EU country counterparties not subject to NFRD disclosure obligations	-																			
41	Loans and advances	-																			
42	Debt securities	-																			
43	Equity instruments	-																			
44	Derivatives	5,435,972,158																			
45	On demand interbank loans	1,057,603,962																			
46	Cash and cash-related assets	-																			
47	Other categories of assets (e.g. Goodwill, commodities etc.)	107,591,315																			
48	**Total GAR assets**	54,047,563,454[1]	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
49	Assets not covered for GAR calculation	18,820,295,560																			
50	Central governments and Supranational issuers	17,387,736,668																			
51	Central banks exposure	1,432,558,892																			
52	Trading book	-																			
53	**Total assets**	72,867,859,014																			
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																					
54	Financial guarantees	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
55	Assets under management	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
56	Of which debt securities	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
57	Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

1) 'Total GAR assets' decreased by 17 bln EUR from 2024. This can be attributed to a change in classification to 'Central governments and Supranational issuers' of relevant assets.

31 DECEMBER 2024 TURNOVER BASED

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t
		Dec-24																			
			Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					(WTR)	(CE)	(PPC)	(BIO)	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)									Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
				Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)									Of which environmentally sustainable (Taxonomy-aligned)				
		Total (gross) carrying amount			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling	Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which Use of Proceeds	Of which transitional	Of which enabling
1	**GAR - Covered assets in both numerator and denominator**																				
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	9,543,726,361	5,246,904,444	158,896,560	97,681,642	566,445	311,365	80,147	13,352	11	2,635	-	-	-	-	-	5,246,984,591	158,909,912	97,681,654	569,080	311,365
3	**Financial corporations**	7,613,359,290	3,316,537,373	64,511,047	3,296,129	566,445	311,365	80,147	13,352	11	2,635	-	-	-	-	-	3,316,617,520	64,524,399	3,296,141	569,080	311,365
4	Credit institutions	2,366,970,987	529,158,267	64,511,047	3,296,129	566,445	311,365	80,147	13,352	11	2,635	-	-	-	-	-	529,238,414	64,524,399	3,296,141	569,080	311,365
5	Loans and advances	1,808,798,643	202,315,819	16,694,458	1,831,846	499,900	276,907	76,408	11,944	11	2,445	-	-	-	-	-	202,392,228	16,706,402	1,831,858	502,345	276,907
6	Debt securities, including UoP	558,172,344	326,842,447	47,816,589	1,464,283	66,545	34,458	3,739	1,409	-	190	-	-	-	-	-	326,846,186	47,817,997	1,464,283	66,734	34,458
7	Equity instruments	-	-	-		-	-	-	-		-	-	-	-	-	-	-	-	-	-	-
8	Other financial corporations	5,246,388,303	2,787,379,106	-	-	-	-	-	-	-	-	-	-	-	-	-	2,787,379,106	-	-	-	-
9	of which investment firms	5,246,388,303	2,787,379,106	-	-	-	-	-	-	-	-	-	-	-	-	-	2,787,379,106	-	-	-	-
10	Loans and advances	220,973,956	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Debt securities, including UoP	5,025,414,347	2,787,379,106	-	-	-	-	-	-	-	-	-	-	-	-	-	2,787,379,106	-	-	-	-
12	Equity instruments	-	-	-		-	-	-	-		-	-	-	-	-	-	-	-	-	-	-
13	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	Equity instruments	-	-	-		-	-	-	-		-	-	-	-	-	-	-	-	-	-	-
17	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Equity instruments	-	-	-		-	-	-	-		-	-	-	-	-	-	-	-	-	-	-
21	**Non-financial corporations**	1,930,367,071	1,930,367,071	94,385,513	94,385,513	-	-	-	-	-	-	-	-	-	-	-	1,930,367,071	94,385,513	94,385,513	-	-
22	Non-financial corporations (subject to NFRD disclosure obligations)	1,930,367,071	1,930,367,071	94,385,513	94,385,513	-	-	-	-	-	-	-	-	-	-	-	1,930,367,071	94,385,513	94,385,513	-	-
23	Loans and advances	1,930,367,071	1,930,367,071	94,385,513	94,385,513	-	-	-	-	-	-	-	-	-	-	-	1,930,367,071	94,385,513	94,385,513	-	-
24	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
25	Equity instruments	-	-	-		-	-	-	-		-	-	-	-	-	-	-	-	-	-	-
26	**Households**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27	of which loans collateralised by residential immovable property	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t
30	**Local governments financing**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
32	Other local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
33	**Assets excluded from the numerator for GAR calculation (covered in the denominator)**	62,601,864,082	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
34	**Financial and Non-financial undertakings**	57,033,045,836																			
35	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	57,033,045,836																			
36	Loans and advances	57,033,045,836																			
37	of which loans collateralised by commercial immovable property	-																			
38	of which building renovation loans	-																			
39	Debt securities	-																			
40	Equity instruments	-																			
41	Non-EU country counterparties not subject to NFRD disclosure obligations	-																			
42	Loans and advances	-																			
43	Debt securities	-																			
44	Equity instruments	-																			
45	Derivatives	4,740,245,530																			
46	On demand interbank loans	786,698,189																			
47	Cash and cash-related assets	-																			
48	Other categories of assets (e.g. Goodwill, commodities etc.)	41,874,528																			
49	**Total GAR assets**	72,145,590,443	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
50	Assets not covered for GAR calculation	6,622,982,062																			
51	Central governments and Supranational issuers	-																			
52	Central banks exposure	6,622,982,062																			
53	Trading book	-																			
54	**Total assets**	78,768,572,505																			
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																					
55	Financial guarantees	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
56	Assets under management	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
57	Of which debt securities	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
58	Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

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		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t
		Dec-25																			
			Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					(WTR)	(CE)	(PPC)	(BIO)	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)									Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
				Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)									Of which environmentally sustainable (Taxonomy-aligned)				
		Total (gross) carrying amount			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling	Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which Use of Proceeds	Of which transitional	Of which enabling
	GAR - Covered assets in both numerator and denominator																				
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	8,303,253,287	327,716,704	89,805,525	-	1,631,688	582,143	3,499,383	14,810	-	-	3,054	13,677	109,635	95,062	-	331,434,461	89,820,335	-	1,631,688	585,197
2	**Financial corporations**	6,062,092,040	327,716,704	89,805,525	-	1,631,688	582,143	3,499,383	14,810	-	-	3,054	13,677	109,635	95,062	-	331,434,461	89,820,335	-	1,631,688	585,197
3	Credit institutions	2,887,095,007	327,716,704	89,805,525	-	1,631,688	582,143	3,499,383	14,810	-	-	3,054	13,677	109,635	95,062	-	331,434,461	89,820,335	-	1,631,688	585,197
4	Loans and advances	1,748,278,858	106,280,722	51,544,206	-	1,565,054	572,395	3,499,383	14,810	-	-	3,054	5,878	103,786	78,938	-	109,968,708	51,559,016	-	1,565,054	575,448
5	Debt securities, including UoP	1,138,816,149	221,435,982	38,261,319	-	66,634	9,749	-	-	-	-	-	7,799	5,849	16,124	-	221,465,753	38,261,319	-	66,634	9,749
6	Equity instruments	-	-	-		-	-	-	-		-	-	-	-	-	-	-	-		-	-
7	Other financial corporations	3,174,997,033	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	of which investment firms	3,174,997,033	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	24,422,779	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	3,150,574,254	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-		-	-	-	-		-	-	-	-	-	-	-	-		-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-		-	-	-	-		-	-	-	-	-	-	-	-		-	-
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-		-	-	-	-		-	-	-	-	-	-	-	-		-	-
20	**Non-financial corporations**	2,241,161,247	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
21	Non-financial corporations (subject to NFRD disclosure obligations)	2,241,161,247	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
22	Loans and advances	1,909,219,669	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
23	Debt securities, including UoP	331,941,578	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Equity instruments	-	-	-		-	-	-	-		-	-	-	-	-	-	-	-		-	-
25	**Households**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
26	of which loans collateralised by residential immovable property	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t
29	**Local governments financing**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Other local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
32	**Assets excluded from the numerator for GAR calculation (covered in the denominator)**	45,744,310,167	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
33	**Financial and Non-financial undertakings**	39,143,142,733																			
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	39,143,142,733																			
35	Loans and advances	39,143,142,733																			
36	of which loans collateralised by commercial immovable property	-																			
37	of which building renovation loans	-																			
38	Debt securities	-																			
39	Equity instruments	-																			
40	Non-EU country counterparties not subject to NFRD disclosure obligations	-																			
41	Loans and advances	-																			
42	Debt securities	-																			
43	Equity instruments	-																			
44	Derivatives	5,435,972,158																			
45	On demand interbank loans	1,057,603,962																			
46	Cash and cash-related assets	-																			
47	Other categories of assets (e.g. Goodwill, commodities etc.)	107,591,315																			
48	**Total GAR assets**	54,047,563,454[1)]	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
49	Assets not covered for GAR calculation	18,820,295,560																			
50	Central governments and Supranational issuers	17,387,736,668																			
51	Central banks exposure	1,432,558,892																			
52	Trading book	-																			
53	**Total assets**	72,867,859,014																			
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																					
54	Financial guarantees	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
55	Assets under management	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
56	Of which debt securities	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
57	Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

1) 'Total GAR assets' decreased by 17 bln EUR from 2024. This can be attributed to a change in classification to 'Central governments and Supranational issuers' of relevant assets.

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		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t
		Dec-24																			
			Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					(WTR)	(CE)	(PPC)	(BIO)	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)									Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
			Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)									Of which environmentally sustainable (Taxonomy-aligned)				
		Total [gross] carrying amount			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling	Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which Use of Proceeds	Of which transitional	Of which enabling
1	**GAR - Covered assets in both numerator and denominator**																				
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3	**Financial corporations**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Equity instruments	-	-	-		-	-	-	-		-	-	-	-	-	-	-	-		-	-
8	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Equity instruments	-	-	-		-	-	-	-		-	-	-	-	-	-	-	-		-	-
13	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	Equity instruments	-	-	-		-	-	-	-		-	-	-	-	-	-	-	-		-	-
17	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Equity instruments	-	-	-		-	-	-	-		-	-	-	-	-	-	-	-		-	-
21	**Non-financial corporations**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
22	Non-financial corporations (subject to NFRD disclosure obligations)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
23	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
25	Equity instruments	-	-	-		-	-	-	-		-	-	-	-	-	-	-	-		-	-
26	**Households**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27	of which loans collateralised by residential immovable property	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t
30	**Local governments financing**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
32	Other local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
33	**Assets excluded from the numerator for GAR calculation (covered in the denominator)**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
34	**Financial and Non-financial undertakings**	-																			
35	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	-																			
36	Loans and advances	-																			
37	of which loans collateralised by commercial immovable property	-																			
38	of which building renovation loans	-																			
39	Debt securities	-																			
40	Equity instruments	-																			
41	Non-EU country counterparties not subject to NFRD disclosure obligations	-																			
42	Loans and advances	-																			
43	Debt securities	-																			
44	Equity instruments	-																			
45	Derivatives	-																			
46	On demand interbank loans	-																			
47	Cash and cash-related assets	-																			
48	Other categories of assets (e.g. Goodwill, commodities etc.)	-																			
49	**Total GAR assets**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
50	Assets not covered for GAR calculation	-																			
51	Central governments and Supranational issuers	-																			
52	Central banks exposure	-																			
53	Trading book	-																			
54	**Total assets**	-																			
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																					
55	Financial guarantees	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
56	Assets under management	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
57	Of which debt securities	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
58	Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

EU-TAXONOMY TEMPLATE 3: SECTOR INFORMATION FOR GAR

31 DECEMBER 2025 SECTORAL INFORMATION

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab
		Climate Change Mitigation (CCM)				**Climate Change Adaptation (CCA)**				**Water and marine resources (WTR)**				**Circular economy (CE)**				**Pollution (PPC)**				**Biodiversity and Ecosystems (BIO)**				**TOTAL (CCM + CCA + WTR + CE + PPC + BIO)**			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
	Breakdown by sector - NACE 4 digits level (code and label)	[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		Mn EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (WTR)	Mn EUR	Of which environmentally sustainable (WTR)	Mn EUR	Of which environmentally sustainable (CE)	Mn EUR	Of which environmentally sustainable (CE)	Mn EUR	Of which environmentally sustainable (PPC)	Mn EUR	Of which environmentally sustainable (PPC)	Mn EUR	Of which environmentally sustainable (BIO)	Mn EUR	Of which environmentally sustainable (BIO)	Mn EUR	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Mn EUR	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
1	Production of electricity (3511)	126.71	126.71			126.71	-			126.71	-			126.71	-			126.71	-			126.71	-			126.71	126.71		
2	Transmission of electricity (3512)	118.26	-			118.26	-			118.26	-			118.26	-			118.26	-			118.26	-			118.26	-		
3	Water collection, treatment and supply (3600)	1,184.70	-			1,184.70	-			1,184.70	-			1,184.70	-			1,184.70	-			1,184.70	-			1,184.70	-		
4	Waste processing (3720)	226.36	-			226.36	-			226.36	-			226.36	-			226.36	-			226.36	-			226.36	-		
5	Urban and suburban passenger land transport (4931)	126.24	-			126.24	-			126.24	-			126.24	-			126.24	-			126.24	-			126.24	-		
6	Port activities (6310)	126.50	-			126.50	-			126.50	-			126.50	-			126.50	-			126.50	-			126.50	-		
7	Hospital activities (8610)	0.44	-			0.44	-			0.44	-			0.44	-			0.44	-			0.44	-			0.44	-		
...																													

31 DECEMBER 2024 SECTORAL INFORMATION

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab
		Climate Change Mitigation (CCM)				**Climate Change Adaptation (CCA)**				**Water and marine resources (WTR)**				**Circular economy (CE)**				**Pollution (PPC)**				**Biodiversity and Ecosystems (BIO)**				**TOTAL (CCM + CCA + WTR + CE + PPC + BIO)**			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
	Breakdown by sector - NACE 4 digits level (code and label)	[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		Mn EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (WTR)	Mn EUR	Of which environmentally sustainable (WTR)	Mn EUR	Of which environmentally sustainable (CE)	Mn EUR	Of which environmentally sustainable (CE)	Mn EUR	Of which environmentally sustainable (PPC)	Mn EUR	Of which environmentally sustainable (PPC)	Mn EUR	Of which environmentally sustainable (BIO)	Mn EUR	Of which environmentally sustainable (BIO)	Mn EUR	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Mn EUR	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
1	Production of electricity (3511)	94.38	94.38			94.38	-			-	-			-	-			-	-			-	-			94.38	94.38		
2	Transmission of electricity (3512)	114.92	-			114.92	-			-	-			-	-			-	-			-	-			114.92	-		
3	Water collection, treatment and supply (3600)	1,239.33	-			1,239.33	-			-	-			-	-			-	-			-	-			1,239.33	-		
4	Waste processing (3720)	253.32	-			253.32	-			-	-			-	-			-	-			-	-			253.32	-		
5	Urban and suburban passenger land transport (4931)	128.45	-			128.45	-			-	-			-	-			-	-			-	-			128.45	-		
6	Port activities (6310)	99.14	-			99.14	-			-	-			-	-			-	-			-	-			99.14	-		
7	Hospital activities (8610)	0.84	-			0.84	-			-	-			-	-			-	-			-	-			0.84	-		
...																													

EU-TAXONOMY TEMPLATE 4: GAR-KPI POSITION

31 DECEMBER 2025 TURNOVER-BASED

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t
		Dec-25																			
		Climate Change Mitigation (CCM)					**Climate Change Adaptation (CCA)**					**(WTR)**	**(CE)**	**(PPC)**	**(BIO)**	**TOTAL (CCM + CCA + WTR + CE + PPC + BIO)**					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)									Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
% (compared to total covered assets in the denominator)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which adaptation	Of which enabling							Of which Use of Proceeds	Of which transitional/ adaptation	Of which enabling	Proportion of total new assets covered
	GAR - Covered assets in both numerator and denominator																				
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	6.7%	0.4%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	6.7%	0.4%	0.2%	0.0%	0.0%	11.4%
2	**Financial corporations**	6.5%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	6.5%	0.2%	0.0%	0.0%	0.0%	8.3%
3	Credit institutions	0.7%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.7%	0.2%	0.0%	0.0%	0.0%	4.0%
4	Loans and advances	0.2%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	0.1%	0.0%	0.0%	0.0%	2.4%
5	Debt securities, including UoP	0.4%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.4%	0.1%	0.0%	0.0%	0.0%	1.6%
6	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
7	Other financial corporations	5.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	5.8%	0.0%	0.0%	0.0%	0.0%	4.4%
8	of which investment firms	5.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	5.8%	0.0%	0.0%	0.0%	0.0%	4.4%
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
10	Debt securities, including UoP	5.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	5.8%	0.0%	0.0%	0.0%	0.0%	4.3%
11	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
12	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
13	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
15	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
16	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
17	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
19	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
20	**Non financial corporations**	0.2%	0.2%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	0.2%	0.2%	0.0%	0.0%	3.1%
21	Non-financial corporations subject to NFRD disclosure obligations	0.2%	0.2%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	0.2%	0.2%	0.0%	0.0%	3.1%
22	Loans and advances	0.2%	0.2%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	0.2%	0.2%	0.0%	0.0%	2.6%
23	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%
24	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t
25	**Households**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
26	of which loans collateralised by residential immovable property	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
27	of which building renovation loans	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
28	of which motor vehicle loans	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
29	**Local government financing**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
30	Collateral obtained by taking possession: residential and commercial immovable properties	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
31	Other local governments financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
32	**TOTAL GAR ASSETS**																				

31 DECEMBER 2024 TURNOVER-BASED

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t
		Dec-24																			
		Climate Change Mitigation (CCM)					**Climate Change Adaptation (CCA)**					**(WTR)**	**(CE)**	**(PPC)**	**(BIO)**	**TOTAL (CCM + CCA + WTR + CE + PPC + BIO)**					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)									Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
% (compared to total covered assets in the denominator)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which adaptation	Of which enabling							Of which Use of Proceeds	Of which transitional/ adaptation	Of which enabling	Proportion of total new assets covered
1	**GAR - Covered assets in both numerator and denominator**																				
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	7.3%	0.2%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	7.3%	0.2%	0.1%	0.0%	0.0%	6.7%
3	**Financial corporations**	4.6%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	4.6%	0.1%	0.0%	0.0%	0.0%	4.2%
4	Credit institutions	0.7%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.7%	0.1%	0.0%	0.0%	0.0%	0.7%
5	Loans and advances	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.3%	0.0%	0.0%	0.0%	0.0%	0.3%
6	Debt securities, including UoP	0.5%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%	0.1%	0.0%	0.0%	0.0%	0.4%
7	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
8	Other financial corporations	3.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	3.9%	0.0%	0.0%	0.0%	0.0%	3.5%
9	of which investment firms	3.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	3.9%	0.0%	0.0%	0.0%	0.0%	3.5%
10	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
11	Debt securities, including UoP	3.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	3.9%	0.0%	0.0%	0.0%	0.0%	3.5%
12	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
13	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
14	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
15	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
16	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
17	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
18	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
19	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
20	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
21	**Non financial corporations**	2.7%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.7%	0.1%	0.1%	0.0%	0.0%	2.5%
22	Non-financial corporations subject to NFRD disclosure obligations	2.7%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.7%	0.1%	0.1%	0.0%	0.0%	2.5%
23	Loans and advances	2.7%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.7%	0.1%	0.1%	0.0%	0.0%	2.5%
24	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
25	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t
26	**Households**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
27	of which loans collateralised by residential immovable property	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
28	of which building renovation loans	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
29	of which motor vehicle loans	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
30	**Local government financing**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
32	Other local governments financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
49	**TOTAL GAR ASSETS**																				

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		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t
		Dec-25																			
		Climate Change Mitigation (CCM)					**Climate Change Adaptation (CCA)**					**(WTR)**	**(CE)**	**(PPC)**	**(BIO)**	**TOTAL (CCM + CCA + WTR + CE + PPC + BIO)**					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)									Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
% (compared to total covered assets in the denominator)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which adaptation	Of which enabling							Of which Use of Proceeds	Of which transitional/ adaptation	Of which enabling	Proportion of total new assets covered
	GAR - Covered assets in both numerator and denominator																				
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0.6%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.6%	0.2%	0.0%	0.0%	0.0%	11.4%
2	**Financial corporations**	0.6%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.6%	0.2%	0.0%	0.0%	0.0%	8.3%
3	Credit institutions	0.6%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.6%	0.2%	0.0%	0.0%	0.0%	4.0%
4	Loans and advances	0.2%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	0.1%	0.0%	0.0%	0.0%	2.4%
5	Debt securities, including UoP	0.4%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.4%	0.1%	0.0%	0.0%	0.0%	1.6%
6	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
7	Other financial corporations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	4.4%
8	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	4.4%
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
10	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	4.3%
11	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
12	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
13	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
15	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
16	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
17	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
19	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
20	**Non financial corporations**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	3.1%
21	Non-financial corporations subject to NFRD disclosure obligations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	3.1%
22	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.6%
23	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%
24	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t
25	**Households**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
26	of which loans collateralised by residential immovable property	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
27	of which building renovation loans	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
28	of which motor vehicle loans	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
29	**Local government financing**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
30	Collateral obtained by taking possession: residential and commercial immovable properties	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
31	Other local governments financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
32	**TOTAL GAR ASSETS**																				

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		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t
		Dec-24																			
		Climate Change Mitigation (CCM)					**Climate Change Adaptation (CCA)**					**(WTR)**	**(CE)**	**(PPC)**	**(BIO)**	**TOTAL (CCM + CCA + WTR + CE + PPC + BIO)**					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)									Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
% (compared to total covered assets in the denominator)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which adaptation	Of which enabling							Of which Use of Proceeds	Of which transitional/ adaptation	Of which enabling	Proportion of total new assets covered
1	**GAR - Covered assets in both numerator and denominator**																				
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
3	**Financial corporations**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
4	Credit institutions	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
5	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
6	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
7	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
8	Other financial corporations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
9	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
10	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
11	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
12	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
13	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
14	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
15	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
16	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
17	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
18	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
19	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
20	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
21	**Non financial corporations**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
22	Non-financial corporations subject to NFRD disclosure obligations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
23	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
24	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
25	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t
26	**Households**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
27	of which loans collateralised by residential immovable property	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
28	of which building renovation loans	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
29	of which motor vehicle loans	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
30	**Local government financing**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
32	Other local governments financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
49	**TOTAL GAR ASSETS**																				

EU-TAXONOMY TEMPLATE 5: GAR-KPI FLOW

2025 TURNOVER-BASED

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t
		Dec-25																			
		Climate Change Mitigation (CCM)					**Climate Change Adaptation (CCA)**					**(WTR)**	**(CE)**	**(PPC)**	**(BIO)**	**TOTAL (CCM + CCA + WTR + CE + PPC + BIO)**					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)									Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
% (compared to total covered assets in the denominator)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which adaptation	Of which enabling							Of which Use of Proceeds	Of which transitional/ adaptation	Of which enabling	Proportion of total new assets covered
	GAR - Covered assets in both numerator and denominator																				
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	5.7%	0.5%	0.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	5.7%	0.5%	0.5%	0.0%	0.0%	5.1%
2	**Financial corporations**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
3	Credit institutions	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
4	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
5	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
6	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
7	Other financial corporations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
8	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
10	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
11	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
12	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
13	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
15	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
16	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
17	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
19	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
20	**Non financial corporations**	5.7%	0.5%	0.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	5.7%	0.5%	0.5%	0.0%	0.0%	5.1%
21	Non-financial corporations subject to NFRD disclosure obligations	5.7%	0.5%	0.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	5.7%	0.5%	0.5%	0.0%	0.0%	5.1%
22	Loans and advances	5.7%	0.5%	0.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	5.7%	0.5%	0.5%	0.0%	0.0%	5.1%
23	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
24	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t
25	**Households**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
26	of which loans collateralised by residential immovable property	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
27	of which building renovation loans	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
28	of which motor vehicle loans	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
29	**Local government financing**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
30	Collateral obtained by taking possession: residential and commercial immovable properties	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
31	Other local governments financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
32	**TOTAL GAR ASSETS**																				

2024 TURNOVER-BASED

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t
		Dec-24																			
		Climate Change Mitigation (CCM)					**Climate Change Adaptation (CCA)**					**(WTR)**	**(CE)**	**(PPC)**	**(BIO)**	**TOTAL (CCM + CCA + WTR + CE + PPC + BIO)**					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)									Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
% (compared to total covered assets in the denominator)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which adaptation	Of which enabling							Of which Use of Proceeds	Of which transitional/ adaptation	Of which enabling	Proportion of total new assets covered
1	**GAR - Covered assets in both numerator and denominator**																				
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	5.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	5.6%
3	**Financial corporations**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
4	Credit institutions	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
5	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
6	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
7	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
8	Other financial corporations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
9	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
10	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
11	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
12	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
13	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
14	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
15	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
16	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
17	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
18	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
19	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
20	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
21	**Non financial corporations**	5.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	5.6%
22	Non-financial corporations subject to NFRD disclosure obligations	5.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	5.6%
23	Loans and advances	5.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	5.6%
24	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
25	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t
26	**Households**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
27	of which loans collateralised by residential immovable property	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
28	of which building renovation loans	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
29	of which motor vehicle loans	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
30	**Local government financing**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
32	Other local governments financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
49	**TOTAL GAR ASSETS**																				

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		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t
		Dec-25																			
		Climate Change Mitigation (CCM)					**Climate Change Adaptation (CCA)**					**(WTR)**	**(CE)**	**(PPC)**	**(BIO)**	**TOTAL (CCM + CCA + WTR + CE + PPC + BIO)**					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)									Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
% (compared to total covered assets in the denominator)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which adaptation	Of which enabling							Of which Use of Proceeds	Of which transitional/ adaptation	Of which enabling	Proportion of total new assets covered
	GAR - Covered assets in both numerator and denominator																				
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	5.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	5.2%	0.0%	0.0%	0.0%	0.0%	4.6%
2	**Financial corporations**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
3	Credit institutions	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
4	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
5	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
6	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
7	Other financial corporations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
8	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
9	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
10	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
11	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
12	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
13	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
14	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
15	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
16	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
17	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
18	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
19	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
20	**Non financial corporations**	5.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	5.2%	0.0%	0.0%	0.0%	0.0%	4.6%
21	Non-financial corporations subject to NFRD disclosure obligations	5.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	5.2%	0.0%	0.0%	0.0%	0.0%	4.6%
22	Loans and advances	5.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	5.2%	0.0%	0.0%	0.0%	0.0%	4.6%
23	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
24	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t
25	**Households**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
26	of which loans collateralised by residential immovable property	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
27	of which building renovation loans	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
28	of which motor vehicle loans	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
29	**Local government financing**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
30	Collateral obtained by taking possession: residential and commercial immovable properties	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
31	Other local governments financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
32	**TOTAL GAR ASSETS**																				

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		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t
		Dec-24																			
		Climate Change Mitigation (CCM)					**Climate Change Adaptation (CCA)**					**(WTR)**	**(CE)**	**(PPC)**	**(BIO)**	**TOTAL (CCM + CCA + WTR + CE + PPC + BIO)**					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)									Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
% (compared to total covered assets in the denominator)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which adaptation	Of which enabling							Of which Use of Proceeds	Of which transitional/ adaptation	Of which enabling	Proportion of total new assets covered
1	**GAR - Covered assets in both numerator and denominator**																				
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
3	**Financial corporations**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
4	Credit institutions	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
5	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
6	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
7	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
8	Other financial corporations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
9	of which investment firms	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
10	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
11	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
12	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
13	of which management companies	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
14	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
15	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
16	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
17	of which insurance undertakings	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
18	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
19	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
20	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
21	**Non financial corporations**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
22	Non-financial corporations subject to NFRD disclosure obligations	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
23	Loans and advances	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
24	Debt securities, including UoP	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
25	Equity instruments	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t
26	**Households**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
27	of which loans collateralised by residential immovable property	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
28	of which building renovation loans	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
29	of which motor vehicle loans	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
30	**Local government financing**	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
32	Other local governments financing	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
49	**TOTAL GAR ASSETS**																				

LIST OF SHAREHOLDERS AS AT 1 JANUARY 2025

	Number of A shares at €115	Number of B shares at €460
Aa en Maas Water Authority	627	301
Amstel, Gooi en Vecht Water Authority	281	60
Brabantse Delta Water Authority	2,016	483
Delfland Water Authority	755	60
De Dommel Water Authority	533	360
Drents Overijsselse Delta Water Authority	2,236	232
Fryslân Water Authority	3,309	100
Hollandse Delta Water Authority	1,893	143
Hollands Noorderkwartier Water Authority	4,399	204
Hunze en Aa's Water Authority	1,915	175
Limburg Water Authority	2,401	299
Noorderzijlvest Water Authority	1,107	170
Province of Drenthe	15	25
Province of Friesland	24	25
Province of Gelderland	44	50
PrProvince ofvincie Limburg	11	20
Province of Noord-Brabant	33	40
Province of Noord-Holland	43	60
Province of Utrecht	43	60
Province of Zeeland	15	20
Province of Zuid-Holland	33	40
Rijn en IJssel Water Authority	5,666	345
Rijnland Water Authority	4,858	289
Rivierenland Water Authority	3,968	437
Scheldestromen Water Authority	4,380	166
Schieland en de Krimpenerwaard Water Authority	610	430
Dutch State	1,208	3,333
De Stichtse Rijnlanden Water Authority	224	47
Vallei en Veluwe Water Authority	631	88
Vechtstromen Water Authority	7,158	423
Zuiderzeeland Water Authority	42	26
Total	**50,478**	**8,511**

GLOSSARY

1.5-degree scenario
An agreement under the Paris Climate Accord to limit global warming to below 1.5 degrees Celsius compared to pre-industrial levels.

AAA/Aaa ratings
Highest creditworthiness ratings from credit rating agencies S&P and Moody's.

Actuarial gain/loss
The difference between the expected and actual return on pension fund investments.

Additional Tier 1 capital (AT1 capital)
AT1 capital refers to certain financial instruments (bonds) that may be added to Tier 1 capital under the Basel III rules.

Amortised cost
The value at which a receivable or liability is initially recorded on the balance sheet.

Aquathermal energy
Sustainable heating and cooling using thermal energy from surface water, wastewater or drinking water.

Audacious goal
A challenging ambition of an organisation. In the case of NWB Bank, it refers to a credit portfolio that aims to be energy-positive by 2035, progressing toward climate neutrality by 2050.

Avoided emissions
Greenhouse gases that were not emitted due to a specific approach or technology, such as using renewable energy instead of fossil fuels.

Balance sheet financing
Financing focused on managing an organisation's total assets and liabilities, based on its overall financial position. This contrasts with project financing, which is used for specific, often large-scale and capital-intensive projects.

Base year
The reference year used as a benchmark for indexation.

Basel III
Global agreements to strengthen banks' capital positions in response to the 2008 financial crisis.

Bearer bond
A debt security that is not registered in the name of a specific beneficiary.

Biobased
Material of biological origin.

Biodiversity
Biodiversity or biological diversity is a term for the degree of variety between the life forms in a given ecosystem, biome or an entire planet. Biodiversity is often used as an indicator of the health of an ecosystem.

Biodiversity Framework
A guideline from the water authorities for biodiversity restoration, including indicators for policies, measures and their effects.

Capital conservation buffer
An additional capital reserve that banks must maintain on top of minimum capital requirements to absorb financial shocks and ensure the stability of the financial system.

Carbon footprint
The contribution of an activity, person or country to climate change.

Cash-flow statement
A report detailing all cash inflows and outflows of a company over a specific period.

Capital release
A situation where previously reserved capital becomes available again.

Capital Requirements Regulation
A European regulation that sets capital requirements for credit institutions and investment firms to ensure the stability and resilience of the financial system.

Caps, floors and swaptions
Instruments used to hedge specific interest rate risks.

Carbon credits
Tradeable certificates that allow organisations to offset emissions by investing in projects that reduce or remove greenhouse gases.

Charters
Internal regulations.

Circular economy
An economic system aiming to maximise the reusability of products and raw materials, and to minimise the loss of their value, as opposed to the current linear system, where raw materials are used to manufacture products that are destroyed at the end of their useful lives.

Climate action plan
A set of goals for reducing greenhouse gas emissions and the steps to achieve them, particularly focused on the climate impact of lending at NWB Bank.

Climate adaptation
Adapting the environment and preparing for the consequences of climate change is called climate change adaptation. Examples of climate adaptation include strengthening dikes, widening rivers and adding greenery to towns and villages.

Climate neutral
Activities that have no net negative impact on the climate and therefore do not contribute to climate change.

Climate mitigation
Preventing further climate change by reducing greenhouse gas emissions is called climate change mitigation. For example, consider renewable energy projects.

Climate neutral
The organisation's activities should not have a negative impact to the climate and thus will not contribute to climate change.

Cofinancing
A contribution to an investment with other parties.

Collateral
Security for a loan.

Commercial paper
A short-term (up to one year) tradeable debt instrument.

Common Equity Tier 1 ratio (CET1 ratio)
The bank's core capital expressed as a percentage of total risk positions. CET1 capital is part of Tier 1 capital.

Complaints procedure
NWB Bank provides stakeholders with an opportunity to submit a complaint through a complaints procedure. This procedure is mentioned on the website.

Confidential advisor
A designated contact person within an organisation who provides support, advice and guidance in cases of inappropriate behaviour.

Connectivity table
Graphical representation of the relationship between strategic issues, material issues and KPIs.

Context analysis
Mapping the environment in which an organisation operates.

Control monitoring and testing
Activities to periodically monitor and test key control measures for compliance risks.

Corporate governance
The organisation of the management of (listed) companies and their supervision. It regulates the relationship between administrators, supervisory board members and shareholders.

Corporate Sustainability Reporting Directive
European directive requiring companies to report on their sustainability performance based on ESG criteria.

Cost/income ratio
Operating expenses (excluding bank tax, resolution levy and expected credit loss) compared to operating income.

CO_2 equivalent
A unit of measurement used to express the impact of different greenhouse gases on the climate in terms of the equivalent amount of CO_2.

Countercyclical capital buffer
Additional capital set aside during good times to reduce the risk of bank failures during downturns.

Counterparty credit risk
The risk that a counterparty fails to meet its financial obligations.

Covered bond
A bond issued by a financial institution, backed by residential mortgages as collateral.

Credit default swap
A financial derivative that allows a party to hedge against the risk of borrower default or to speculate on the creditworthiness of a debt issuer.

Credit impaired
Reduced creditworthiness.

Credit rating agency
A company, such as Standard & Poor's or Moody's, that assesses the creditworthiness of businesses, governments and financial instruments and publishes these ratings to help investors evaluate risks.

Credit Support Annex
A collateral agreement used to mitigate the market value risk of derivatives.

Credit Valuation Adjustment
An adjustment in the valuation of a derivative to reflect the creditworthiness of the counterparty.

Currency swap
An agreement between two parties to exchange interest payments and principal amounts in two different currencies at an agreed exchange rate.

Customer due diligence
A background check on a client to assess risk, prevent money laundering, fraud and terrorist financing. Also known as client validation.

Cybersecurity Framework
Guidelines, standards and best practices to help organisations enhance their cybersecurity.

Data leak
Access to or destruction, alteration or release of personal data at an organisation without this being the organisation's intention, or without it being legally permitted.

Debt ratio
The level of debt in relation to income.

Debt security
A signed promise by the borrower to repay a loan to the lender within a specified period.

Debt valuation adjustment
An adjustment in the valuation of a derivative to reflect the creditworthiness of the bank.

Default
Standard value.

Deferred tax
A future tax obligation that a company is already aware of and has quantified.

Defined contribution
A predetermined premium for pension accumulation.

Delta Plan for Biodiversity Restoration
A partnership of nature organisations, farmers, citizens, research institutions, governments and businesses aiming to restore biodiversity in the Netherlands.

Deposit guarantee scheme
A system of rules ensuring banks provide compensation to account holders in case of a bank failure.

Derivative
A financial contract whose value is derived from the price movements of an underlying asset, such as stocks, bonds, currencies or commodities.

Digital Operational Resilience Act
European regulation to enhance the resilience of financial institutions against cyber incidents.

Discount
The negative difference between the current value of a debt security and its nominal value.

Discount rate
The interest rate used to calculate the present value of future cash flows.

Discretionary authority
The administrative freedom to make decisions based on judgement in specific cases.

Dividend payout ratio
Dividend payout compared to net profit.

Dollar value of a basis point
A measure that expresses the price or market value change in monetary terms for a one basis point (0.01%) shift in the yield curve.

Double materiality
This approach looks at important issues from two angles: the potential positive and negative impact of the organisation on people and the environment, and the impact of sustainability risks and opportunities on the organisation itself, whether financial or otherwise. The former is called the inside-out perspective, the latter the outside-in perspective.

Emission intensity
Greenhouse gas emissions per financed euro.

Energy positive
Producing more energy than is consumed. In the case of NWB Bank, this means that the renewable energy projects it finances generate more renewable energy than all its clients consume in fossil energy.

Energy transition
The shift from fossil fuel use to energy from renewable sources.

Engagement approach
A strategy in which an organisation, such as a bank, actively promotes stakeholder (client) involvement and participation to achieve shared goals.

Entrusted funds
Liabilities of banks to the public, such as demand deposits, savings deposits and term deposits.

Equator Principles
A risk management framework for project financing, adopted by financial institutions, which is used to determine, assess and manage social and environmental risks in the financing of projects.

ESG
ESG stands for environmental, social and governance.

ESG Accelerator
A project team at NWB Bank consisting of employees working to accelerate the integration of ESG into core processes.

ESG bonds
Bonds that take into account environmental and social characteristics of an investment, with attention to proper governance of the issuer.

European Association of Public Banks
An industry organisation representing over 90 public financial institutions with total assets exceeding €3,500 billion and a 15% market share in the European financial sector.

European Sustainability Reporting Standards
European guidelines requiring companies to report on their sustainability performance based on specific criteria.

EU Taxonomy (for sustainable activities)
A classification system that defines which economic activities are considered sustainable, allowing companies and financial institutions to report on sustainability.

Expected loss impairment methodology
A method used by financial institutions to estimate expected credit losses and allocate provisions based on future risks and losses.

Exposure at default
The expected outstanding debt owed to a financial institution at the time of a client's or counterparty's default.

Exposure central clearing
The net balance of daily settlements of derivatives, adjusted for received or posted collateral, with central counterparties.

External Credit Assessment Institution
A credit rating agency recognised by the European Union to provide credit ratings used for prudential regulation.

External financing
An investment received by a company from an external party, such as a bank.

Fair value hedge accounting
An accounting method used to recognise potential liabilities that affect the fair market value of assets or other obligations.

Finance for Biodiversity Pledge
A coalition of financial institutions committed to protecting and restoring biodiversity through their activities and investments.

Financial Stability Board
An international body that monitors the global financial system and makes recommendations to promote financial stability.

Financial Statements Format Decree
A legal decree establishing standardised templates for financial statement formats.

Forborne performing
Loans whose terms were previously renegotiated or adjusted due to the borrower's financial difficulties but are now considered performing again as payment obligations are being met.

Fund transfer pricing
A method used to determine the credit spread added to an institution's own funding costs.

Future-Oriented Banking
A self-regulation package from the Dutch Banking Association, consisting of the Social Charter, the Banking Code and the Code of Conduct.

Gap analysis
A method for identifying the difference between an organisation's current and desired state, helping to bridge the gap by mapping out areas for improvement and opportunities.

Gender pay gap
The difference in earnings between men and women in the same role, reflecting historical inequality in compensation between genders.

Geothermal energy
A sustainable heating technology that extracts heat from the earth's subsurface.

Global Reporting Initiative
GRI is an independent international organisation that helps organisations to communicate the impact of business on critical sustainability issues such as climate change, human rights, corruption, etc.

Going concern assumption
The principle that a company will continue its operations in the foreseeable future.

Green Bond
NWB Bank issues Water Bonds, the proceeds of which are used to finance 'green' water authority projects. NWB Bank applies the Green Bond Principles, which are the leading standard on the issue of such bonds.

Green Deal Sustainable Healthcare
Agreements between the government and healthcare institutions to make the sector more sustainable.

Greenwashing
A marketing tactic where a company gives the false impression of being more sustainable than it actually is.

Green-blue network
The connection of natural areas through landscape elements such as hedges, ditches, ponds, verges, woodlands and parks.

GRI guidelines
Reporting guidelines for reporting by organisations on their material issues and the accompanying environmental, social and economic effects.

Guarantee Institution
An entity that provides financial guarantees.

Heat stress
Health issues that arise when high temperatures and humidity prevent humans and animals from properly regulating body temperature.

Heat transition
The shift towards renewable energy sources for heat generation.

Hedge accounting
An accounting method that aligns the timing of gains and losses on derivatives with those of the underlying positions they are used for, providing a more accurate picture of a company's financial health.

ICSR covenant
A covenant for international corporate social responsibility.

Inside-out perspective
Inside-out perspective The positive and negative impact of a company on sustainability themes such as climate change, biodiversity and working conditions.

Intangible assets
Fixed assets related to non-physical capital goods, such as licenses, patents and goodwill.

Interest Rate Risk in the Banking Book
Current or future risk to both an institution's earnings and economic value due to unfavourable interest rate movements affecting interest-sensitive instruments.

Internal Capital Adequacy Assessment Process
An assessment of whether a bank's capital is sufficient for each type of risk, including stress tests to evaluate the resilience of its capitalisation.

Internal Liquidity Adequacy Assessment Process
An assessment of whether a bank's liquidity position and liquidity risk management are adequate.

International Swaps and Derivatives Association
An industry association for participants in the over-the-counter derivatives market.

Investment mandate
A set of agreements defining the framework within which an investor may operate.

Irrevocable payment commitment
A financial institution's irrevocable obligation to pay a specified amount.

Issuer
An entity that issues securities.

Joint Supervisory Team
A team of supervisors composed of European Central Bank staff and national supervisory authority representatives, responsible for banking supervision.

Key performance indicators
Metrics used to measure the performance of a company, its employees, and its products and/or services.

Key person risk
The risk that a crucial employee becomes unavailable for an extended period.

Kilowatt-hour
A unit of measurement for energy consumption, representing 1,000 watts (1 kilowatt) used per hour.

Kunming-Montreal Global Biodiversity Framework
A 2022 international agreement setting targets to combat global biodiversity loss, focusing on nature conservation and sustainability.

Lending
Lending All long-term (>1 year) loans provided by NWB Bank to clients, including newly issued loans, acquired loans and loans with revised interest rates or extended maturities. Investments in NHG RMBS bonds are also included.

Leverage ratio
The ratio of Tier 1 capital to the bank's (adjusted) balance sheet total.

Leverage ratio (adjusted for promotional assets)
The ratio of Tier 1 capital to the bank's (adjusted) balance sheet total. The promotional assets are removed from the balance sheet total.

Lifetime expected credit loss
The expected credit losses due to a client's default over the entire duration of a loan.

Liquidity coverage ratio
An indicator that shows whether sufficient liquid assets are available to absorb a 30-day stress scenario.

Loss given default
The Expected loss a financial institution incurs if a borrower fails to meet its payment obligations.

Low credit risk exemption
A simplification under IFRS 9 that allows banks to assume that the credit risk of a financial instrument has not significantly increased since initial recognition, as long as the instrument is considered low credit risk.

Macro-hedging
A strategy to reduce or eliminate systemic risks in a portfolio by using derivatives.

Management approach
The Management Approach is a reporting item within the GRI framework that provides readers with information on the organisation's strategy and management. It also provides context for the reported performance targets, minimum requirements and trends in CSR performance. A synonym for Management Approach is (internal) governance.

Margin business
In the case of NWB Bank, the practice of earning a margin between borrowed and lent funds while hedging interest rate risks on both sides.

Market abuse
Insider trading and unfair manipulation of prices.

Materiality analysis
The process of determining which economic, environmental and social topics an organisation should report on in its annual report.

Material topics plot
An overview of material topics, assessing their importance both for the company itself (NWB Bank) and for its stakeholders.

Maturity transformation
The process by which banks convert short-term liabilities into long-term assets, such as issuing long-term mortgages funded by short-term deposits.

Medium-Term Note programme
A programme for issuing tradeable debt securities with maturities longer than one year.

Micro-hedging
A strategy aimed at reducing the risk of a specific loan within a portfolio by taking an offsetting position.

Mid-term review
An interim evaluation.

Moody's
An American credit rating agency.

Nature-Inclusive Agenda
A collaboration between businesses, civil society organisations, institutions and governments aiming for a nature-inclusive society by 2050.

Net cash flow
The difference between income and expenditures over a specific period.

Net Stable Funding Ratio (NSFR)
The aim of the Net Stable Funding Ratio is to determine the extent to which longer-term assets are financed with more stable forms of funding.

Netting agreement
An agreement to offset the value of positions or payments between two or more financial parties.

Net-zero standard
The Net-Zero Standard of the Science Based Targets initiative (SBTi), where CO_2 emissions are balanced by the removal of CO_2 from the atmosphere, ensuring no net addition of greenhouse gases.

Non-Financial Reporting Directive
A requirement for companies with more than 500 employees to report on their social and environmental activities.

Non-performing exposure
A loan that no longer meets contractual payment obligations and is considered problematic by the bank.

Note
A debt security issued by a financial institution.

NWB Fund
The NWB Fund is independent form the bank and provide water authorities with financial resources to enable them to contribute to global water solutions based on their core mission and values.

NWB Bank Together Days
Workshops and inspiration sessions for all employees of NWB Bank.

NWB Water Innovation Fund
The NWB Water Innovation Fund is independent from the bank and finances water authorities' innovative projects with wide-ranging applications, which contribute to enhancing sustainability in the Netherlands.

Obligo loan
A loan with a variable principal amount provided to housing associations, intended to supplement the risk capital of the Social Housing Guarantee Fund (WSW).

Off-balance-sheet position
A financial asset or liability not recorded on a company's balance sheet, such as operating leases or certain derivatives.

Onboarding
The introduction and training period for new employees.

One out, all out
A principle in environmental management and sustainability policy stating that if one component of a system fails to meet the standard, the entire system is deemed non-compliant.

Option pricing model
A calculation method used to determine the fair value of options.

Origination date
The date when a loan is officially granted and financing begins.

Outside-in perspective
The financial effects of sustainability-related risks and opportunities on the organisation itself.

Partnership for Biodiversity Accounting Financials
A partnership in the financial sector to transparently assess and disclose the impact and dependence on biodiversity.

Partnership for Carbon Accounting Financials
A financial sector initiative to promote transparency and accountability regarding the Paris Climate Agreement, particularly in relation to CO_2e emissions.

Pass-through NHG RMBS bond
A security backed by residential mortgages, specifically Dutch mortgages with a National Mortgage Guarantee issued by a bank.

Payout ratio
The portion of net profit paid out as dividends to shareholders.

PCAF methodology
A framework and standardised measurement method developed by the Partnership for Carbon Accounting Financials to enhance transparency, awareness, and reporting of CO_2e emissions across various asset classes, including equities, project financing, government bonds, mortgages, corporate financing and real estate.

Performance management
The assessment, measurement and improvement of employee performance to achieve organisational goals.

Performing exposure
A loan that meets contractual payment obligations.

PFAS
Per- and polyfluoroalkyl substances: chemicals harmful to the environment, widely used in industrial and consumer products.

Premium
The positive difference between the current value of a debt security and its nominal value.

Prevention officer
An employee who supports the employer in ensuring workplace safety and health within the organisation.

Probability of default
The likelihood that a borrower will be unable to repay a loan.

Product approval process
The decision-making process a bank follows before producing or distributing a product for its own account and risk or on behalf of its clients. All new products undergo this process.

Product responsibility
The responsibility a bank assumes for offering and managing a specific product.

Projected unit credit method
An actuarial valuation method that projects future salary growth and allocates the cost of employee benefits to each year of service, considering the time value of money.

Promotional asset
A loan provided by a promotional bank or institution to a client or project that contributes to the public interest.

Promotional bank
A financial institution whose activities contribute to the public interest.

Product Approval Process
A process implemented by the bank, which helps to decide whether to provide or distribute a certain product at its own risk and expense or for the benefit of its clients. All new products undergo this process.

Promotional loan
Loan granted directly or through an intermediary lending institution on a non-competitive, non-profit-making basis; a loan that is granted by a public development finance institution or an entity created by the central government, regional government or local government of a Member State of the European Union to further the policy objectives of that Member State.

Prudential supervision
Independent oversight of the financial soundness of financial institutions to ensure the stability of the financial system.

Public development credit institution
A government-initiated financial institution that contributes to achieving public policy objectives.

Rebound clause
A provision in a payment agreement that always allows the primary bank to make a second, more competitive offer.

Reduction targets
The percentage decrease in greenhouse gas emissions compared to 1990 levels, as agreed in climate accords.

Refinancing
Taking out new loans under better conditions to cover existing debts.

Registered bond
A bond issued in the name of a specific holder that is not freely transferable to another successor.

Regulated maximum cost of capital
The maximum return set by regulators that a company may use to calculate the cost of equity and debt financing.

Removal
The process of removing greenhouse gases from the atmosphere using technologies such as carbon capture or reforestation.

Residential mortgage-backed security
A financial security backed by residential mortgages.

Resolution levy
A tax paid by banks as a contribution to the costs of financial rescue operations, such as the nationalisation of a bank.

Global Reporting Initiative Guidelines
Guidelines for organisations to report on their material topics and their associated environmental, social and economic impacts.

Renewable energy
Energy derived from natural sources that are continuously replenished, such as solar and wind energy.

Revaluation reserve
A reserve created when assets increase in value, leading to a rise in equity.

Regulated maximum cost of capital
The maximum return set by regulators that a company may use to calculate the cost of equity and debt financing.

Risk and control framework
A framework used to map processes, risks and controls.

Risk appetite
The level of financial risk a bank is willing to accept.

Risk Appetite Statement
A bank's communicated risk tolerance, both internally and externally.

Risk governance
The internal organisation of risk management. At NWB Bank, risk governance is established within the risk management framework.

Risk materiality assessment
A process for identifying and evaluating key risks based on their potential impact and likelihood of affecting organisational objectives.

Risk profile
The degree to which an individual or organisation is exposed to financial risks.

Risk taxonomy
A structured classification of different types of risks to identify, categorise and manage risks within an organisation.

Schuldschein
A medium- to long-term loan regulated by German law, usually unsecured, documented by a promissory note.

Science Based Target Setting Tool
A tool for setting emission reduction targets based on scientifically validated methods.

Science Based Targets initiative (SBTi)
An organisation that helps companies and financial institutions set science-based targets for reducing greenhouse gas emissions, aligned with the goal of limiting global warming to 1.5°C above pre-industrial levels.

SDE++
The Stimulation of Sustainable Energy Production (SDE, after that: SDE+, as of 2020: SDE++) is a ministerial agreement aiming to stimulate the production of clean and sustainable energy.

Social Bonds
To finance lending to housing associations, we issue special Social Bonds. In issuing these ESG bonds, we use the International Capital Market Association's Social Bond Principles, which are the leading standard in the market for issuing such bonds.

Senior note
A loan that takes priority over most other debts in case of the issuer's bankruptcy.

Sensitivity analysis
A calculation to assess the sensitivity to potential credit losses in the event of borrower default.

Single Resolution Board
An institution within the European banking union responsible for ensuring financial stability and orderly resolution in case of a bank failure.

Single Resolution Mechanism
The Single Resolution Board plus the national resolution authorities of countries participating in the European banking union.

Single Supervisory Mechanism
A supervisory system within the European banking union, consisting of the European Central Bank and national regulators of participating countries.

Sovereigns, Supranationals and Agencies
Entities that issue bonds. Sovereigns refers to national governments, Supranationals to international organisations such as the World Bank, and Agencies to government-related institutions, such as NWB Bank.

Spread risk
The risk of changes in the creditworthiness of bonds and loans.

Stakeholder dialogue
Our stakeholders are all those people and organisations with whom we work or who care about NWB Bank's social role as a promotional bank. These stakeholders include at least our shareholders, clients, investors, employees, regulators and the government. In order to give nature and the environment an adequate voice, we also consider environmental organisations to be our stakeholders. We regularly contact our stakeholders to find out what they are doing. We call this stakeholder dialogue.

Standard & Poor's
An American credit rating agency, now more commonly known as S&P.

Standard return
The return on equity prescribed by the state for a state-owned enterprise.

State Participation Policy Memorandum
A policy document from the Ministry of Finance outlining how the state influences the direction of companies through shareholding to safeguard public interests.

Subordinated debt
A loan in which the lender ranks below other creditors in the event of bankruptcy.

Supervisory dialogue meeting
A meeting between a bank and the Joint Supervisory Team of the European Central Bank as part of banking supervision.

Supervisory Review and Evaluation Process
Annual process in which regulators assess banks' strategies, processes and risks to ensure they have sufficient capital and effective risk management practices to handle potential risks.

Sustainability Advisory Board
Internal advisory committee at NWB Bank responsible for drafting, reviewing and, if necessary, adjusting plans and policies directly related to sustainability.

Sustainability-linked loan
A loan in which the bank and the client agree on a set of sustainability performance indicators. If the client meets the targets, it receives a discount on the interest rate.

Sustainable Development Goals
The SDGs are a set of goals launched in 2015, formulated by the United Nations and intended as a new guiding conceptual framework for sustainable development. NWB Bank and the other Dutch banks seek to play an active part in increasing the sustainability of the economy, and the SDGs are a key frame of reference in this endeavour.

Sustainable energy projects
Sustainable energy projects relate to energy from natural sources: sun, wind, soil and water. The National Green Fund has also been designated a sustainable energy project.

Sustainable Finance Platform
A collaboration within De Nederlandsche Bank involving the financial sector, regulators and ministries, aimed at promoting the sustainability transition in the Netherlands.

Tangible assets
Fixed assets related to physical capital goods, such as land, buildings and machinery.

Targeted longer-term refinancing operations
Support measures by the European Central Bank for banks, initially introduced in response to the financial crisis and later extended due to the COVID-19 crisis.

Task Force on Climate-related Financial Disclosures
A body within the Financial Stability Board that develops recommendations on which information companies should disclose to help investors, lenders and insurers accurately assess and price climate-related risks.

Terajoule
A unit of energy equal to 1,000,000,000,000 joules, equivalent to 31,600 cubic metres of natural gas or 278,000 kilowatt-hours of electricity.

Thin capitalisation rule
A minimum capital requirement for banks and insurers that limits the tax deductibility of interest on corporate debt.

Three Lines of Defence model
A risk management framework where the first line consists of operational management, the second line covers risk management and compliance, and the third line is internal audit.

Tier 1 capital ratio
The bank's core capital including Additional Tier 1 capital, expressed as a percentage of total risk-weighted assets.

Town hall session
An informal information meeting where, in this case, the NWB Bank Managing Board informs all employees about topics such as annual figures, half-year results and the outcomes of the annual strategy cycle.

Transition risk
The risk of financial losses due to the shift to a sustainable economy, for example, caused by stricter regulations or changing market conditions.

Transmission channel
A mechanism through which changes in financial policy or external shocks affect financial stability and bank performance, such as through interest rate changes or credit conditions.

Transparency benchmark
A ranking by the Ministry of Economic Affairs and Climate that assesses the 500 largest companies in the Netherlands based on transparency in corporate social responsibility (CSR) reporting.

Two-tier board
A governance structure that separates management and supervision, where the Managing Board is responsible for the company's daily operations, while a separate Supervisory Board oversees the management.

UN Global Compact
A United Nations initiative of relevance to companies wishing to operate and report in a socially responsible manner. It comprises ten principles in the areas of human rights, labour, environment and anti-corruption.

Upstream and downstream
The entire value chain from top to bottom, covering everything from suppliers to customers and distributors.

Value adjustment
A change in the value of financial assets or liabilities due to factors such as market conditions, interest rate changes or credit risk.

Value chain (analysis)
A model used to analyse an organisation's activities and assess how it creates, or fails to create, value for clients.

Value chain map
A model used to identify and prioritize significant impacts, risks and opportunities (IROs) across an organisation's entire value chain.

Value creation model
A schematic representation of a company's impact on people, society and the environment, illustrating how it creates value for its stakeholders and the broader community.

Vision quadrant
A four-part framework for connection, motivation and inspiration within NWB Bank, consisting of the bank's mission, core values, core qualities and audacious goal.

Watch classification
A designation indicating that a loan shows potential issues and must be closely monitored to prevent deterioration in credit quality.

Water Authorities' Climate Monitor
An annual study commissioned by the Association of Dutch Water Authorities and NWB Bank to assess the progress of water authorities in the areas of energy, climate and sustainability.

Water Bond
An ESG bond labeled as a Green Bond, intended to finance the activities of water authorities.

Water Framework Directive
An EU directive on water quality, requiring that all surface water and groundwater in member states be chemically clean and ecologically healthy by 2027.

Whistle-blower policy
A requirement for companies with 50 or more employees to have a procedure for reporting potential misconduct within the organisation.

LIST OF ABBREVIATIONS

Abbreviation	Description
€STR	Euro short-term rate
AGM	Annual General Meeting of Shareholders
ALCO	Asset & Liability Committee
AOW	*Algemene Ouderdomswet* (General Old Age Pensions Act)
AUD	Australian dollar
BCMS	Business Continuity Management System
bhv	*bedrijfshulpverlening* (emergency response officers)
bp	basis point
BRRD	Bank Recovery and Resolution Directive
CAD	Canadian dollar
CCA	climate change adaptation
CCM	climate change mitigation
CCO	chief commercial officer
CDD	customer due diligence
CDS	credit default swap
CET1	common equity tier 1 (capital reserves)
CFO	chief financial officer
CHF	Swiss franc
CLA	collective labour agreement
CO_2e	carbon dioxide equivalent
CoC	Chamber of Commerce
COVID-19	Corona virus disease-2019
CP	commercial paper
CPB	Statistics Netherlands (*Centraal Planbureau*)
CRD	Capital Requirements Directive
CRO	chief risk officer
CRR	Capital Requirements Regulation
CRS	credit risk score

Abbreviation	Description
CSA	Credit Support Annex
CSRBB	credit spread risk in the banking book
CSR	corporate social responsibility
CSRD	Corporate Sustainability Reporting Directive
CT	corporate tax
CVA	credit valuation adjustment
DC	defined contribution
DCC	Dutch Civil Code
DCO	*decentrale overheid* (provincial authorities)
DGS	Deposit Guarantee Scheme
DMA	double materiality analysis
DNB	The Dutch Central Bank (De Nederlandse Bank)
DORA	Digital Operational Resilience Act
DR	disclosure requirement
DV01	Dollar Value of one basis point
DVA	debit valuation adjustment
dVi	*de Verantwoordingsinformatie* (financial accountability of housing associations)
EAD	exposure at default
EAPB	European Association of Public Banks
EAR	earnings at risk
EBA	European Banking Authority
ECB	European Central Bank
ECL	expected credit loss
ECP	Euro Commercial Paper
EIB	European Investment Bank
EGM	extraordinary general meeting of shareholders
ESEF	European Single Electronic Format
ESG	environmental, social and governance

Abbreviation	Description
ESRS	European Sustainability Reporting Standards
EU	European Union
EU-PAB	EU Paris-Alligned Benchmarks
EUR	euro
FSB	Financial Stability Board
FTE	full-time equivalent
FX	foreign exchange
GAAP	generally accepted accounting principles
GBP	British pound
GHG	greenhouse gas
GIAS	Global Internal Audit Standards
GRI	Global Reporting Initiative
GWh	Gigawatt hours
HKD	Hong Kong dollar
HR	human resources
HRM	human resource management
HWBP	*Hoogwaterbeschermingsprogramma* (Dutch Flood Protection Programme)
IAD	Internal Audit Department
IAS	International Accounting Standards
ICAAP	Internal Capital Adequacy Assessment Process
ICSR	international corporate social responsibility
ICT	information and communications technology
IEA	International Energy Agency
IFRS	international financial reporting standards
IIA	Institute of Internal Auditors
ILAAP	Internal Liquidity Adequacy Assessment Process
ILT	Inspectorate for the Environment and Transport
IPC	irrevocable payment commitment

Abbreviation	Description
IPCC	Intergovernmental Panel on Climate Change
IPPF	International Professional Practices Framework
IRO	impact, risk and opportunity
IRRBB	Interest Rate Risk in the Banking Book
ISDA	International Swaps and Derivatives Association
IT	Information Technology
JPY	Japanese yen
JST	Joint Supervisory Team
KIWI	introductory training programme for water managers (Kennis en Introductieprogramma Waterschappen Inernationaal)
KNMI	Royal Netherlands Meteorological Institute
KPI	key performance indicator
KRI	key risk indicator
LCR	liquidity coverage ratio
LCRE	low credit risk exemption
LGD	loss given default
LT	long-term 10 years
MSCI	medium-long term 3-10 years Morgan Stanley Capital International
MLT	medium-long term 3-10 years
NBA	Royal Netherlands Institute of Chartered Accountants (*Koninklijke Nederlandse Beroepsorganisatie van Accountants*)
NFRD	Non-Financial Reporting Directive
NGFS	Network for Greening the Financial System
NHG RMBS	National Mortgage Garantuee Residential Mortgage-Backed Security
NII	net interest income
NOK	Norwegian krone
NSFR	net stable funding ratio
NVKS	further regulations on quality systems (*nadere voorschriften kwaliteitssystemen*)
NZD	New Zealand dollar

Abbreviation	Description
NZE	net zero emissions
OIS	overnight index swaps
ORM	operational risk management
PBAF	Partnership for Biodiversity Accounting Financials
PCAF	Parnership for Carbon Accounting Financials
PD	probability of default
PFAS	Per- and polyfluoroalkyl substances
PPI	Premium pension institution
PPP	public-private partnership
RAC	Remuneration and Appointment Committee
RMA	risk materiality assessment
RMBS	residential mortgage-backed securities
RTS	regulatory technical standards
SB	Supervisory Board
SBTi	Science Based Targets initiative
SDE++	Stimulation of Sustainable Energy Production (Stimulering Duurzame Energieproductie)
SDG	Sustainable Development Goal
SEK	Swedish krona
SER	Social and Economic Council (*Sociaal-Economische Raad*)
SFI	special financial institution
SGEI	Services of general economic interest
SICR	significant increase in credit risk
SIRA	systematic integrity risk assessment
SLL	sustainability linked loan
SMT	short-medium term 1-3 years
SNK	National Carbon Market Foundation (*Stichting Nationale Koolstofmarkt*)
SoI	statement of income
SPP	strategic personnel planning
SRB	Single Resolution Board

Abbreviation	Description
SREP	Supervisory Review and Evaluation Process
SRM	Single Resolution Mechanism
SSA	Sovereigns, Supranationals and Agencies
ST	short-term < 1 year
SSM	Single Supervisory Mechanism
SWOT	strengths weaknesses opportunities threats
TCFD	Task Force on Climate-related Financial Disclosures
tCO_2e	tonnes of CO_2 equivalent
TJ	terajoule
UK	United Kingdom
UMC	University Medical Center
UN	United Nations
USCP	US Commercial Paper
USD	US dollar
UTP	unlikely to pay
UvW	Association of Dutch Water Authorities (*Unie van Waterschappen*)
VAT	value added tax
VGBA	Dutch Code of Ethics (Verordening gedrags- en beroepsregels accountants)
VNG	Association of Netherlands Municipalities (*Vereniging van Nederlandse Gemeenten*)
WACC	weighted average cost of capital
WAVES	Water Authority Analysis and Improvement System (*Waterschap Analyse- en Verbetersysteem*)
WcW	Collective Heating Supply Act (*Wet collectieve warmte*)
WFD	Water Framework Directive
Wft	Financial Supervision Act (*Wet op het financieel toezicht*)
WfZ	Healthcare Guarantee Fund (*Waarborgfonds voor de Zorgsector*)
WIA	Work and Income according to Labour Capacity Act (*Wet werk en inkomen naar arbeidsvermogen*)
WIF	NWB Water Innovation Fund

Abbreviation	Description
WRI	World Resources Institute
WSW	Social Housing Guarantee Fund *(Waarborgfonds Sociale Woningbouw)*
ZAR	South African rand

COLOPHON

Editorial, production and design

NWB Bank
CF Report
Het Nederlands Tekstbureau
Narrative Labs

Photography

Portaits of Managing Board, Supervisory Board and employees: Martijn Beekman
Portraits interview Lidwin van Velden and Joanne Kellermann: Phil Nijhuis
Picture of Dunea: Dunea
Picture of Geothermie Delft: Sander van den Bosch, Geothermie Delft
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Questions or comments

If you have any questions about or comments about this Annual Report, please do not hesitate to contact us by email at persinfo@nwbbank.com.

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