

Bank of Ireland Group plc
Semi-Annual Pillar 3 Disclosures
30 June 2025

This document contains forward-looking statements with respect to certain of Bank of Ireland Group plc (the 'Company' or 'BoIG plc') and its subsidiaries' (collectively the 'Group' or 'BoIG plc Group') plans and its current goals and expectations relating to its future financial condition and performance, the markets in which it operates and its future capital requirements. These forward-looking statements often can be identified by the fact that they do not relate only to historical or current facts. Generally, but not always, words such as 'may,' 'could,' 'should,' 'will,' 'expect,' 'intend,' 'estimate,' 'anticipate,' 'assume,' 'believe,' 'plan,' 'seek,' 'continue,' 'target,' 'goal,' 'would,' or their negative variations or similar expressions identify forward-looking statements, but their absence does not mean that a statement is not forward-looking.

Examples of forward-looking statements include, among others: statements regarding the Group's near term and longer term future capital requirements and ratios, loan to deposit ratios, expected impairment charges, the level of the Group's assets, the Group's financial position, future income, business strategy, projected costs, margins, future payments of dividends, future share buybacks, the implementation of changes in respect of certain of the Group's pension schemes, estimates of capital expenditures, discussions with Irish, United Kingdom, European and other regulators, plans and objectives for future operations, and the continued impact of regional conflicts on the above issues and generally on the global and domestic economies. Such forward-looking statements are inherently subject to risks and uncertainties, and hence actual results may differ materially from those expressed or implied by such forward-looking statements.

Nothing in this document should be considered to be a forecast of future profitability, dividend forecast or financial position of the Group and none of the information in this document is or is intended to be a profit forecast, dividend forecast or profit estimate. Any forward-looking statement speaks only at the date it is made. The Group does not undertake to release publicly any revision to these forward-looking statements to reflect events, circumstances or unanticipated events occurring after the date hereof.

Location of Pillar 3 disclosures		Bank of Ireland Group plc	
Disclosures		Pillar 3 Disclosure Tab(s)	
Pillar 3 overview		Index	
Pillar 3 table index		Introduction	
Introduction		1.1	1.2
Key highlights			1.3
Capital			
Overview		Capital	
Capital requirements		2.1	2.2
Capital resources		2.4	2.5
Countercyclical capital buffer			2.6
Credit risk			
Overview		Credit Risk	
Analysis of standardised approach		3.1	3.2
Analysis of IRB approach		3.3	3.4
		3.6	3.7
			3.8
Analysis of credit risk - Equity exposures			
Analysis of Credit Risk Quality		3.9	3.10
- Performing and Non-performing exposures			3.11
- Changes in the stock of non-performing loans and advances			3.12
- Quality of forbearance			3.13
- Quality of non-performing exposures by geography			3.14
- Credit quality of loans and advances by industry			3.15
Credit risk mitigation			
Counterparty credit risk		Counterparty credit risk	
Overview			
Counterparty credit risk exposure			4.1
- Exposure by approach			4.2
- Standardised approach exposures			4.3
- IRB approach exposures			4.4
Counterparty credit risk collateral			4.5
Credit derivative exposures			4.6
Exposure to CCPs			
Securitisation		Securitisation	
Overview			5.1
Securitisation exposures in the non-trading book		5.2	5.3
Securitisation exposures in the non-trading book and associated regulatory capital requirements			5.4
Securitisation exposures in default and specific credit risk adjustments			
Market risk		Market Risk	
Overview			6.1
- Market risk under the standardised approach			
Interest Rate Risk in the Banking Book		IRRBB	
Overview			7.1
- Interest rate risks of non-trading book activities			
Liquidity risk		Liquidity Risk	
Overview			8.1
- Qualitative information on LCR disclosures			8.2
- LCR disclosures			8.3
- Net Stable Funding Ratio			
Leverage ratio		Leverage Ratio	
Overview		9.1	9.2
Leverage ratio exposures			9.3
ESG risk		ESG Risk	
Environmental Risk		Environmental Risk	
Social Risk		Social Risk	
Governance Risk		Governance Risk	
- Banking book - Indicators of potential climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity			10.1
- Banking book - Indicators of potential climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral			10.2
- Banking book - Indicators of potential climate change transition risk: Alignment metrics			10.3
- Banking book - Indicators of potential climate change transition risk: Exposures to top 20 carbon-intensive firms			10.4
- Banking book - Indicators of potential climate change physical risk: Exposures subject to physical risk			10.5
Appendices		Appendix I	
Appendix I: Table references			Glossary
Glossary			
Abbreviations			Abbreviations
Previous		Next	

[Introduction](#)

Table 1.1	EU KM1 - Key metrics - Regulatory basis
Table 1.2	IFRS 9-FL - Key metrics - Regulatory basis
Table 1.3	EU KM2 - Key metrics - MREL and, where applicable, G-SII requirement for own funds and eligible liabilities

[Capital](#)

Table 2.1	EU OV1 - Overview of risk weighted exposure amounts
Table 2.2	EU CMS1 – Comparison of modelled and standardised risk weighted exposure amounts at risk level
Table 2.3	EU CMS2 – Comparison of modelled and standardised risk weighted exposure amounts for credit risk at asset class level
Table 2.4	EU CC1 - Composition of regulatory own funds
Table 2.5	EU CC2 - Reconciliation of regulatory own funds to balance sheet in the audited financial statements
Table 2.6	EU CCyB - Geographical distribution of credit exposures relevant for the calculation of the countercyclical capital buffer

[Credit Risk](#)

Table 3.1	EU CR4 - Standardised approach - Credit risk exposure and CRM effects
Table 3.2	EU CR5 - Standardised approach by exposure class
Table 3.3	EU CR6 - IRB approach - Credit risk exposures by exposure class and PD scale (Foundation IRB)
Table 3.4	EU CR6 - IRB approach - Credit risk exposures by exposure class and PD scale (Advanced IRB)
Table 3.5	EU CR7 - IRB approach – Effect on the RWEAs of credit derivatives used as CRM techniques
Table 3.6	EU CR7-A - IRB approach – Disclosure of the extent of the use of CRM techniques
Table 3.7	EU CR8 - RWEA flow statements of credit risk exposures under the IRB approach
Table 3.8	EU CR10.5 – Equity exposures under Articles 133 (3) to (6) and 495a(3) CRR
Table 3.9	EU CR1 - Performing and non-performing exposures and related provisions
Table 3.10	EU CR1-A - Maturity of exposures
Table 3.11	EU CR2 - Changes in the stock of non-performing loans and advances
Table 3.12	EU CQ1 - Credit quality of forborne exposures
Table 3.13	EU CQ4 - Quality of non-performing exposures by geography
Table 3.14	EU CQ5 - Credit quality of loans and advances to non-financial corporations by industry
Table 3.15	EU CR3 - CRM techniques overview: Disclosure of the use of credit risk mitigation techniques

[Counterparty Credit Risk](#)

Table 4.1	EU CCR1 - Analysis of CCR exposures by approach
Table 4.2	EU CCR3 - Standardised approach – CCR exposures by regulatory exposure class and risk weights
Table 4.3	EU CCR4 - IRB approach - Credit risk exposures by exposure class and PD scale
Table 4.4	EU CCR5 - Composition of collateral for CCR exposures
Table 4.5	EU CCR6 - Credit derivative exposures
Table 4.6	EU CCR8 - Exposures to CCPs

[Securitisation](#)

Table 5.1	EU-SEC1 - Securitisation exposures in the non-trading book
Table 5.2	EU-SEC3 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as originator or as sponsor
Table 5.3	EU-SEC4 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as investor
Table 5.4	EU-SEC5 - Exposures securitised by the institution - Exposures in default and specific credit risk adjustments

[Market Risk](#)

Table 6.1	EU MR3 - Market risk under the simplified standardised approach (SSA)
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[Interest Rate Risk in the Banking Book](#)

Table 7.1	EU IRRBB1 - Interest rate risks of non-trading book activities
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[Liquidity Risk](#)

Table 8.1	EU LIQB - Qualitative information on LCR disclosures.
Table 8.2	EU LIQ1 - LCR disclosures
Table 8.3	EU LIQ2 - Net Stable Funding Ratio

[Leverage Ratio](#)

Table 9.1	EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio exposures
Table 9.2	EU LR2 - LRCom: Leverage ratio common disclosure
Table 9.3	EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)

[ESG Risks](#)

Table 10.1	Template 1: Banking book- Indicators of potential climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity
Table 10.2	Template 2: Banking book - Indicators of potential climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral
Table 10.3	Template 3: Banking book - Indicators of potential climate change transition risk: Alignment metrics
Table 10.4	Template 4: Banking book - Indicators of potential climate change transition risk: Exposures to top 20 carbon-intensive firms
Table 10.5	Template 5: Banking book - Indicators of potential climate change physical risk: Exposures subject to physical risk

[Appendices](#)

Appendix I	Table References
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[Glossary](#)

[Abbreviations](#)

[Previous](#)

[Next](#)

The purpose of the Pillar 3 disclosures is to disclose information in accordance with the scope of application of Capital Requirements Directive & Regulation (CRD) requirements for the Group, particularly covering capital requirements and resources, credit risk, counterparty credit risk, information on securitisation activity, market risk, liquidity risk, leverage ratio and ESG risk.

These disclosures represent the Pillar 3 disclosures of Bank of Ireland Group plc ('the Group') as at 30 June 2025. They have been prepared in accordance with the requirements of the Capital Requirements Directive & Regulation (CRD), most recently updated by CRR III and CRDVI. In addition, we present disclosures as set out in Implementing Regulation (EU) 2021/763 relating to relevant information on Minimum Requirement for Own Funds and Eligible Liabilities (MREL).

It should be noted that while some quantitative information in this document is based on financial data contained in the Group's Interim Report 30 June 2025, the majority of the quantitative data is sourced from the Group's regulatory returns and is calculated according to regulatory requirements. Please note the figures in this report are in millions of euro and may contain rounding differences as they are compiled using information reported to supervisors in units of euro.

The difference between the accounting data and information sourced from the Group's regulatory returns is most evident for credit risk disclosures where credit exposure under CRD unlike financial statement information, includes potential future drawings of committed credit lines as well as other technical differences. Pillar 3 quantitative data is thus not always directly comparable with the quantitative data contained in the Group's Interim Report 30 June 2025.

Article 432(1) of the CRD and the EBA Guidelines on Materiality, Proportionality and Confidentiality and on Disclosure Frequency, allow for the omission of certain elements of information from Pillar 3 Disclosures on the basis of materiality.

Frequency

Under the CRD, the frequency of disclosures is now determined by the size of institution per Article 433. The Group is classified as a listed "large institution" as it meets certain conditions laid out in Article 4. The Group will disclose the requirements as outlined under Article 433a for a listed large institution and at the frequency required.

Verification

Information which is sourced from the Group's Interim Report 30 June 2025 may be subject to review by the Group's external auditors and is subject to both internal and external review, along with appropriate governance procedures. The Pillar 3 document is subject to a robust governance process including final approval by the Group Audit Committee (GAC).

Media

Copies of the Group's Pillar 3 Disclosures can be obtained from the Group's website at www.bankofireland.com.

Policy

The Group Financial Controller has approved the Group's Pillar Disclosure Policy which sets out how the Group complies with the Pillar 3 disclosure requirements. The policy sets out the overall approach to disclosure including inter alia frequency and method of disclosure, type of information to be disclosed, data sources and verification of disclosures, as well as setting out internal controls and procedures to be followed.

Attestation by Board member

"I confirm that Bank of Ireland Group's Pillar 3 Disclosures for 30 June 2025 to the best of my knowledge, comply with Part Eight of the CRD and have been prepared in accordance with the Group's Pillar 3 Disclosure Policy".

Mark Spain

Group Chief Financial Officer

As per Article 447, points (a) to (g) and Article 438, point (b), Table 1.1 provides a summary of the main prudential and regulatory information and ratios covered by the CRR on a transitional basis. It also includes information on Pillar 2 requirements. Non relevant comparatives in relation to the introduction of CRR III are left blank.

Table 1.1 - EU KM1 - Key metrics - Regulatory basis

		a	b	c	d	e
		June 2025	March 2025	December 2024 ¹	September 2024	June 2024
Available own funds (amounts)						
1	Common equity tier 1 (CET1) (€m)	7,970	8,022	8,055	7,544	7,520
2	Tier 1 (€m)	9,469	9,690	9,124	8,611	8,495
3	Total capital (€m)	11,155	11,384	10,819	10,304	10,482
Risk-weighted exposure amounts						
4	Total risk exposure amount	52,153	51,582	55,302	53,583	52,187
4a	Total risk exposure pre-floor	52,153	51,582			
Capital ratios (as a percentage of risk-weighted exposure amount)						
5	Common Equity Tier 1 ratio (%)	15.28%	15.55%	14.57%	14.08%	14.41%
5a	Not applicable					
5b	Common Equity Tier 1 ratio considering unfloored TREA (%)	15.28%	15.55%			
6	Tier 1 ratio (%)	18.16%	18.79%	16.50%	16.07%	16.28%
6a	Not applicable					
6b	Tier 1 ratio considering unfloored TREA (%)	18.16%	18.79%			
7	Total capital ratio (%)	21.39%	22.07%	19.56%	19.23%	20.09%
7a	Not applicable					
7b	Total capital ratio considering unfloored TREA (%)	21.39%	22.07%			
Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)						
EU 7d	Additional own funds requirements to address risks other than the risk of excessive leverage (%) of which:	2.40%	2.40%	2.35%	2.35%	2.35%
EU 7e	to be made up of CET1 capital (percentage points)	1.35%	1.35%	1.32%	1.32%	1.32%
EU 7f	to be made up of Tier 1 capital (percentage points)	1.80%	1.80%	1.76%	1.76%	1.76%
EU 7g	Total SREP own funds requirements (%)	10.40%	10.40%	10.35%	10.35%	10.35%
Combined buffer and overall capital requirement (as a percentage of risk-weighted exposure amount)						
8	Capital conservation buffer (%)	2.50%	2.50%	2.50%	2.50%	2.50%
EU 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	-	-	-	-	-
9	Institution specific countercyclical capital buffer (%)	1.53%	1.52%	1.49%	1.50%	1.50%
EU 9a	Systemic risk buffer (%)	-	-	-	-	-
10	Global Systemically Important Institution buffer (%)	-	-	-	-	-
EU 10a	Other Systemically Important Institution buffer (%)	1.50%	1.50%	1.50%	1.50%	1.50%
11	Combined buffer requirement (%)	5.53%	5.52%	5.49%	5.50%	5.50%
EU 11a	Overall capital requirements (%)	15.93%	15.92%	15.84%	15.85%	15.85%
12	CET1 available after meeting the total SREP own funds requirements (%)	9.43%	9.70%	8.74%	8.26%	8.52%
Leverage ratio						
13	Total exposure measure	140,957	138,847	137,013	136,407	134,565
14	Leverage ratio (%)	6.72%	6.98%	6.66%	6.31%	6.31%
Additional own funds requirements to address the risk of excessive leverage (as a percentage of total exposure measure)						
EU 14a	Additional own funds requirements to address the risk of excessive leverage (%) of which:	-	-	-	-	-
EU 14b	to be made up of CET1 capital (percentage points)	-	-	-	-	-
EU 14c	Total SREP leverage ratio requirements (%)	3.00%	3.00%	3.00%	3.00%	3.00%
Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)						
EU 14d	Leverage ratio buffer requirement (%)	-	-	-	-	-
EU 14e	Overall leverage ratio requirement (%)	3.00%	3.00%	3.00%	3.00%	3.00%
Liquidity Coverage Ratio						
15	Total high-quality liquid assets (HQLA) (Weighted value -average)	37,929	37,541	36,994	36,442	35,952
EU 16a	Cash outflows - Total weighted value ²	20,315	19,898	19,557	19,469	19,693
EU 16b	Cash inflows - Total weighted value	1,331	1,155	1,065	1,026	1,014
16	Total net cash outflows (adjusted value) ²	18,984	18,743	18,492	18,443	18,679
17	Liquidity coverage ratio (%) ²	199.91%	200.35%	200.07%	197.65%	192.61%
Net Stable Funding Ratio						
18	Total available stable funding	105,585	104,889	104,755	104,161	104,859
19	Total required stable funding	68,470	67,883	67,592	67,999	68,234
20	NSFR ratio (%)	154.21%	154.51%	154.98%	153.18%	153.68%

¹ The Group capital ratios have been presented including the retained profits in 2024, availing of the regulatory profit verification process.

² The Liquidity Coverage Ratio (LCR) and cash flows for Dec-24 have been restated following a refinement of the calculation of certain outflows. As a result, the Average LCR ratio decreased by 0.57% from 200.64% to 200.07%.

As per Article 473a and Article 468, Table 1.2 shows key metrics as required by the EBA/GL/2020/12 relating to the impact if the IFRS 9 transitional arrangements had not been applied. The Group elected to take advantage of the static and dynamic elements of the transitional capital rules in respect of expected credit losses introduced in 2018. The effect of this was to mitigate the impact on capital in adverse conditions.

Table 1.2 - IFRS 9-FL - Key metrics - Regulatory basis

	a	b	c	d	e
	June 2025	March 2025	December 2024 ¹	September 2024	June 2024
Available capital					
1 Common equity tier 1 (CET1) (€m)	7,970	8,022	8,055	7,544	7,520
2 Common equity tier 1 (CET1) capital as if IFRS9 or analogous ECLs transitional arrangements had not been applied (€m) ²			8,055	7,537	7,511
2a Common equity tier 1 (CET1) capital as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied (€m) ³	7,970	8,022	8,055	7,544	7,520
3 Tier 1 (€m)	9,469	9,690	9,124	8,611	8,495
4 Tier 1 capital as if IFRS9 or analogous ECLs transitional arrangements had not been applied (€m) ²			9,124	8,604	8,486
4a Tier 1 capital as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied (€m) ³	9,469	9,690	9,124	8,611	8,495
5 Total capital (€m)	11,155	11,384	10,819	10,304	10,482
6 Total capital as if IFRS9 or analogous ECLs transitional arrangements had not been applied (€m) ²			10,819	10,297	10,473
6a Total capital as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied (€m) ³	11,155	11,384	10,819	10,304	10,482
Risk weighted assets					
7 Total RWA (€m)	52,153	51,582	55,302	53,583	52,187
8 Total risk-weighted assets as if IFRS9 or analogous ECLs transitional arrangements had not been applied (€m) ²			55,302	53,577	52,177
Risk-based capital ratios as a % of RWA					
9 Common equity tier 1 ratio (%)	15.28%	15.55%	14.57%	14.08%	14.41%
10 Common equity tier 1 ratio (%) as if IFRS9 or analogous ECLs transitional arrangements had not been applied ²			14.57%	14.07%	14.39%
10a Common equity tier 1 ratio (%) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied ³	15.28%	15.55%	14.57%	14.08%	14.41%
11 Tier 1 ratio (%)	18.16%	18.79%	16.50%	16.07%	16.28%
12 Tier 1 ratio (%) as if IFRS9 or analogous ECLs transitional arrangements had not been applied ²			16.50%	16.06%	16.26%
12a Tier 1 ratio (%) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied ³	18.16%	18.79%	16.50%	16.07%	16.28%
13 Total capital ratio (%)	21.39%	22.07%	19.56%	19.23%	20.09%
14 Total capital ratio (%) as if IFRS9 or analogous ECLs transitional arrangements had not been applied ²			19.56%	19.22%	20.07%
14a Total capital ratio (%) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied ³	21.39%	22.07%	19.56%	19.23%	20.09%
Leverage ratio					
15 Total Leverage ratio exposure measure (€m)	140,957	138,847	137,013	136,407	134,565
16 Leverage ratio (%)	6.72%	6.98%	6.66%	6.31%	6.31%
17 Leverage ratio (%) as if IFRS9 or analogous ECLs transitional arrangements had not been applied ²			6.66%	6.31%	6.31%
17a Leverage ratio (%) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied ³	6.72%	6.98%	6.66%	6.31%	6.31%

¹ The Group capital ratios have been presented including the retained profits in 2024 availing of the regulatory profit verification process.

² As at 1 January 2025, the transitional period as per CRR Article 473a (Introduction of IFRS9) expired.

³ The Group has not availed of the Article 468 temporary treatment of certain unrealised gains and losses expires after 31 December 2025.

Table 1.3 shows key metrics as set out in Implementing Regulation (EU) 2021/763 relating to relevant information on MREL.

Table 1.3 - EU KM2 - Key metrics - MREL and, where applicable, G-SII requirement for own funds and eligible liabilities

		Minimum requirement for own funds and eligible liabilities (MREL)	G-SII Requirement for own funds and eligible liabilities (TLAC)				
			a June 2025	b June 2025	c March 2025	d December 2025	e September 2025
Own funds and eligible liabilities, ratios and components							
1	Own funds and eligible liabilities (€m)	17,582	-	-	-	-	-
	of which;						
EU-1a	own funds and subordinated liabilities (€m)	17,582	-	-	-	-	-
2	Total risk exposure amount of the resolution group (TREA) (€m)	52,153	-	-	-	-	-
3	Own funds and eligible liabilities as a percentage of TREA (row1/row2) (%)	33.71%	-	-	-	-	-
	of which;		-	-	-	-	-
EU-3a	own funds and subordinated liabilities (%)	33.71%					
4	Total exposure measure of the resolution group (€m)	140,957	-	-	-	-	-
5	Own funds and eligible liabilities as percentage of the total exposure measure (%)	12.47%	-	-	-	-	-
	of which;		-	-	-	-	-
EU-5a	own funds or subordinated liabilities (%)	12.47%					
6a	Does the subordination exemption in Article 72b(4) of the CRR apply? (5% exemption)		-	-	-	-	-
6b	Pro-memo item - Aggregate amount of permitted non-subordinated eligible liabilities in-instruments If the subordination discretion as per Article 72b(3) CRR is applied (max 3.5% exemption)		-	-	-	-	-
6c	Pro-memo item: If a capped subordination exemption applies under Article 72b (3) CRR, the amount of funding issued that ranks pari passu with excluded liabilities and that is recognised under row 1, divided by funding issued that ranks pari passu with excluded Liabilities and that would be recognised under row 1 if no cap was applied (%)		-	-	-	-	-
Minimum requirement for own funds and eligible liabilities (MREL)							
EU-7	MREL requirement expressed as percentage of the total risk exposure amount (%)	28.60%					
	of which;						
EU-8	to be met with own funds or subordinated liabilities (%)	14.12%					
EU-9	MREL requirement expressed as percentage of the total exposure measure (%)	7.55%					
	of which;						
EU-10	to be met with own funds or subordinated liabilities (%)	7.55%					

The Group's CET1 capital ratio (excluding the H1 audited profits) is 15.28% at 30 June 2025 (31 December 2024: 14.57%) calculated on a regulatory basis.

The increase of c.70 basis points since 31 December 2024 is primarily due to the implementation of CRR III and the impact on RWA as further explained on tab 2.1.

As per Article 438 point (d), Table 2.1 provides an overview of the total risk exposure amounts (TREA) forming the denominator of the risk based capital requirements calculated in accordance with Article 92 of the CRR. Total own funds requirements are calculated as 8% of TREA. Non relevant comparatives in relation to the introduction of CRR III are left blank.

The decrease of €3.1 billion in RWA primarily reflects the implementation of CRR III, FX and NPE migration, offset by the loan book movements and amortisation on credit risk transfers. CRR III came into effect on 1 January 2025. The key impacts from CRR III are a combination of reduced regulatory LGD rates on certain FIRB exposures, removal of the Basel II IRB risk weight scalar of 6%, reduced risk weights on certain portfolios on standardised exposures, partially offset by an increase due to the change to the calculation for operational risk.

Table 2.1 - EU OV1 - Overview of total risk exposure amounts

		a	b	c
		Jun-25	Dec-24	Jun-25
		Total risk exposure amounts (TREA) €m	Total risk exposure amounts (TREA) €m	Total own funds requirements €m
1	Credit risk (excluding CCR)	42,582	45,563	3,407
	<i>of which;</i>			
2	<i>the standardised approach</i>	13,509	13,751	1,081
3	<i>the Foundation IRB (F-IRB) approach</i>	14,082	17,757	1,127
4	<i>slotting approach</i>	-	-	-
EU 4a	<i>equities under the simple risk weighted approach</i>	-	-	-
5	<i>the Advanced IRB (A-IRB) approach</i>	14,386	13,601	1,151
6	Counterparty credit risk - CCR	632	690	51
	<i>of which;</i>			
7	<i>the standardised approach</i>	589	616	47
8	<i>internal model method (IMM)</i>	-	-	-
EU 8a	<i>exposures to a CCP</i>	20	28	2
9	<i>other CCR</i>	22	46	2
10	Credit valuation adjustments risk - CVA risk	265	161	21
	<i>of which;</i>			
EU 10a	<i>the standardised approach (SA)</i>	-	-	-
EU 10b	<i>the basic approach (F-BA and R-BA)</i>	265	-	21
EU 10c	<i>the simplified approach</i>	-	-	-
11	not applicable			
12	not applicable			
13	not applicable			
14	not applicable			
15	Settlement risk	1	-	0
16	Securitisation exposures in the non-trading book (after the cap)	1,252	1,879	100
	<i>of which;</i>			
17	<i>SEC-IRBA approach</i>	1,124	1,707	90
18	<i>SEC-ERBA (including IAA)</i>	129	172	10
19	<i>SEC-SA approach</i>	-	-	-
EU 19a	<i>1250% / deduction</i>	-	-	-
20	Position, foreign exchange and commodities risks (Market risk)	283	346	23
	<i>of which;</i>			
21	<i>the Alternative standardised approach (A-SA) ¹</i>			
EU 21a	<i>the Simplified standardised approach (S-SA)</i>	283	346	23
22	<i>Alternative Internal Model Approach (A-IMA) ¹</i>			
EU 22a	Large exposures	-	-	-
23	Reclassifications between the trading and non-trading books	-	-	-
24	Operational risk	7,138	6,662	571
EU 24a	Exposures to crypto-assets	-	-	-
25	<i>Amounts below the thresholds for deduction (subject to 250% risk weight)</i>	2,053	1,986	164
26	<i>Output floor applied (%)</i>	50.00%		0.00%
27	<i>Floor adjustment (before application of transitional cap)</i>	-	-	-
28	Floor adjustment (after application of transitional cap)	-	-	-
29	Total	52,153	55,302	4,172

1.The "of which" analysis for Market Risk in rows 21 and 22 is not applicable until the implementation of the Fundamental Review of the Trading Book (FRTB). Row 21a presents the amount according to the CRR II standardised approach.

As per Article 438 point (d) and (da), Table 2.2 provides the composition of RWA by risk type and separated by modelled approaches. In addition, the table provides an overview of RWA calculated using the full standardised approach and RWA that is the base of the output floor.

Table 2.2 - EU CMS1 – Comparison of modelled and standardised risk weighted exposure amounts at risk level

	a	b	c	d	EU d
	RWEAs for modelled approaches that banks have supervisory approval to use	RWEAs for portfolios where standardised approaches are used	Total actual RWEAs (a + b)	RWEAs calculated using full standardised approach	RWEAs that is the base of the output floor
	€m	€m	€m	€m	€m
Jun-25					
1 Credit risk (excluding counterparty credit risk)	28,469	13,509	41,977	46,320	46,296
2 Counterparty credit risk	537	94	632	763	763
3 Credit valuation adjustment		265	265	265	265
4 Securitisation exposures in the banking book	1,124	129	1,252	3,614	1,630
5 Market risk	-	283	283	283	253
6 Operational risk		7,138	7,138	7,138	7,138
7 Other risk weighted exposure amounts		606	606	606	606
8 Total	30,130	22,023	52,153	58,989	56,950

As per Article 438 point (d) and (da), Table 2.3 provides the composition of credit risk broken down at asset class level and separated by modelled approaches. In addition, the table provides an overview of credit risk rwa calculated using the full standardised approach and rwa that is the base of the output floor.

Table 2.3 - EU CMS2 – Comparison of modelled and standardised risk weighted exposure amounts for credit risk at asset class level

	a	b	c	d	EU d
	RWEAs for modelled approaches that institutions have supervisory approval to use	RWEAs for column (a) if re-computed using the standardised approach	Total actual RWEAs	RWEAs calculated using full standardised approach	RWEAs that is the base of the output floor
	€m	€m	€m	€m	€m
Jun-25					
1 Central governments and central banks	-	-	306	306	306
EU 1a Regional governments or local authorities	-	-	8	8	8
EU 1b Public sector entities	-	-	27	27	27
EU 1c Categorised as Multilateral Development Banks in SA	-	-	-	-	-
EU 1d Categorised as International organisations in SA	-	-	-	-	-
2 Institutions	463	720	523	780	780
3 Equity	-	-	2,306	2,306	2,306
4 Not applicable					
5 Corporates	8,303	8,853	10,234	10,808	10,784
of which;					
5.1 F-IRB is applied	8,303	8,853	8,303	8,853	8,853
5.2 A-IRB is applied	-	-	-	-	-
EU 5a Corporates - General	6,992	7,340	8,920	9,292	9,268
EU 5b Corporates - Specialised lending	1,310	1,513	1,313	1,516	1,516
EU 5c Corporates - Purchased receivables	-	-	-	-	-
6 Retail	2,340	1,999	5,218	4,876	4,876
of which;					
6.1 Retail - Qualifying revolving	366	361	366	361	361
EU 6.1a Retail - Purchased receivables	-	-	-	-	-
EU 6.1b Retail - Other	1,974	1,638	4,852	4,515	4,515
6.2 Retail - Secured by residential real estate ¹	11,446	14,982	11,446	14,982	14,982
7 not applicable					
EU 7a Categorised as secured by immovable properties and ADC exposures in SA	16,453	19,667	19,295	22,509	22,509
EU 7b Collective investment undertakings (CIU)	-	-	120	120	120
EU 7c Categorised as exposures in default in SA	600	1,125	880	1,405	1,405
EU 7d Categorised as subordinated debt exposures in SA	-	-	-	-	-
EU 7e Categorised as covered bonds in SA	310	425	310	425	425
EU 7f Categorised as claims on institutions and corporates with a short-term credit assessment in SA	-	-	-	-	-
8 Other non-credit obligation assets	-	-	2,751	2,751	2,751
9 Total	28,469	32,788	41,977	46,320	46,296

¹ Row 6.2 *Retail - Secured by residential real estate* is an "of which" of row EU 7a *Categorised as secured by immovable properties and ADC exposures in SA* rather than row 6. *Retail*

As per Article 437, points (a), (d), (e) and (f), Table 2.4 below provides a breakdown of the constituent elements of the Group's transitional own funds. Regulatory adjustments comprise deductions from own funds and prudential filters. It includes a cross reference to the corresponding rows in template EU CC2 (Tab 2.5) to facilitate full reconciliation of accounting and regulatory own funds.

Table 2.4 - EU CC1 - Composition of regulatory own funds

		a		b	
		Amounts		Source based on reference numbers of the balance sheet under the regulatory scope of consolidation	
		Jun-25 €m			Dec-24 €m
Common equity tier 1 (CET1) capital: Instruments and reserves					
1	Capital instruments and the related share premium accounts of which:	1,413			1,451
	Ordinary stock	957		(a)	995
	Share premium	456		(b)	456
2	Retained earnings	10,144		(c)	10,231
3	Accumulated other comprehensive income (and other reserves)	(758)		(c, d)	(916)
3a	Funds for general banking risk	-			-
4	Amount of qualifying items per Article 484 (3) and related share premium accounts subject to phase out from CET1	-			-
5	Minority interest (amounts allowed in consolidated CET 1)	-			-
5a	Independently reviewed interim profits net of any foreseeable charge or dividend	-		(c)	293
6	Common equity tier 1 (CET 1) capital before regulatory adjustments	10,798			11,060
Common equity tier 1 (CET1) capital regulatory adjustments					
7	Additional value adjustments (negative amount)	(7)			(7)
8	Intangible assets (net of related tax liability) (negative amount)	(1,187)		(f)	(1,113)
9	Not applicable	-			-
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)	(496)		(g)	(574)
11	Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value	27			41
12	Negative amounts resulting from the calculation of expected loss amounts	(76)			(66)
13	Any increase in equity that results from securitised assets (negative amount)	-			-
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing	(17)			(17)
15	Defined-benefit pension fund assets (negative amount)	(705)		(h, i)	(846)
16	Direct, indirect and synthetic holdings by an institution of own CET1 instruments (negative amount)	-			-
17	Direct, indirect and synthetic holdings of the CET 1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-			-
18	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-			-
19	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-			-
20	not applicable	-			-
EU-20a	Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative	(4)			(5)
EU-20b	of which: qualifying holdings outside the financial sector (negative amount)	-			-
EU-20c	of which: securitisation positions (negative amount)	(4)			(5)
EU-20d	of which: free deliveries (negative amount)	-			-
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)	-			-
22	Amount exceeding the 17.65% threshold (negative amount)	-			-
23	of which: direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities	-			-
24	not applicable	-			-
25	of which: deferred tax assets arising from temporary differences	-			-
EU-25a	Losses for the current financial year (negative amount)	(25)			-
EU-25b	Foreseeable tax charges relating to CET1 items except where the institution suitably adjusts the amount of CET1 items insofar as such tax charges reduce the amount up to which those items may be used to cover risks or losses (negative amount)	-			-
26	not applicable	-			-
27	Qualifying AT1 deductions that exceed the AT1 items of the institution (negative amount)	-			-
27a	Other regulatory adjustments	(339)			(417)
28	Total regulatory adjustments to Common Equity Tier 1 (CET1)	(2,829)			(3,005)
29	Common Equity Tier 1 (CET1) capital	7,970			8,055
Additional Tier 1 (AT1) Capital: instruments					
30	Capital instruments and the related share premium accounts	1,500		(e)	1,069
31	of which: classified as equity under applicable accounting standards	1,500		(e)	1,069
32	of which: classified as liabilities under applicable accounting standards	-			-
33	Amount of qualifying items referred to in Article 484 (4) CRR and the related share premium accounts subject to phase out from AT1	-			-
EU-33a	Amount of qualifying items referred to in Article 494a(1) CRR subject to phase out from AT1	-			-
EU-33b	Amount of qualifying items referred to in Article 494b(1) CRR subject to phase out from AT1	-			-
34	Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties	-			-
35	of which: instruments issued by subsidiaries subject to phase out	-			-
36	Additional Tier 1 (AT1) capital before regulatory adjustments	1,500			1,069
Additional Tier 1 (AT1) Capital: regulatory adjustments					
37	Direct, indirect and synthetic holdings by an institution of own AT1 instruments (negative amount)	(.4)			(1)
38	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-			-
39	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-			-
40	Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	-			-
41	not applicable	-			-
42	Qualifying T2 deductions that exceed the T2 items of the institution (negative amount)	-			-
42a	Other regulatory adjustments to AT1 capital	-			-
43	Total regulatory adjustments to Additional Tier 1 (AT1) capital	(.4)			(1)
44	Additional Tier 1 (AT1) capital	1,500			1,068
45	Tier 1 capital (T1 = CET1 + AT1)	9,469			9,124
Tier 2 (T2) Capital: instruments and provisions					
46	Capital instruments and the related share premium accounts	1,846		(j)	1,856
47	Amount of qualifying items referred to in Article 484(5) CRR and the related share premium accounts subject to phase out from T2 as described in Article 486(4) CRR	-		(j)	-
EU-47a	Amount of qualifying items referred to in Article 494a(2) CRR subject to phase out from T2	-			-
EU-47b	Amount of qualifying items referred to in Article 494b(2) CRR subject to phase out from T2	-			-
48	Qualifying own funds instruments included in consolidated T2 capital (including minority interests and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties	-			-
49	of which: instruments issued by subsidiaries subject to phase out	-			-
50	Credit risk adjustments	-			-
51	Tier 2 (T2) capital before regulatory adjustments	1,846			1,856
Tier 2 (T2) capital: regulatory adjustments					
52	Direct, indirect and synthetic holdings by an institution of own T2 instruments and subordinated loans (negative amount)	-			-
53	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-			-
54	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-			-
54a	not applicable	-			-
55	Direct, indirect and synthetic holdings by the institution of the T2 instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	(160)			(160)
56	not applicable	-			-
EU-56a	Qualifying eligible liabilities deductions that exceed the eligible liabilities items of the institution (negative amount)	-			-
EU-56b	Other regulatory adjustments to T2 capital	-			-
57	Total regulatory adjustments to Tier 2 (T2) capital	(160)			(160)
58	Tier 2 (T2) capital	1,686			1,696
59	Total capital (TC = T1 + T2)	11,155			10,819
60	Total Risk exposure amount	52,153			55,302

Capital ratios and requirements including buffers			
61	Common Equity Tier 1 capital	15.28%	14.57%
62	Tier 1 capital	18.16%	16.50%
63	Total capital	21.39%	19.56%
64	Institution CET1 overall capital requirements	11.38%	11.31%
65	of which: capital conservation buffer requirement	2.50%	2.50%
66	of which: countercyclical capital buffer requirement	1.53%	1.49%
67	of which: systemic risk buffer requirement	-	-
EU-67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer requirement	1.50%	1.50%
EU-67b	of which: additional own funds requirements to address the risks other than the risk of excessive leverage	1.35%	1.32%
68	Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements	9.43%	8.74%
National minima (if different from Basel III)			
69	not applicable	-	-
70	not applicable	-	-
71	not applicable	-	-
Amounts below the threshold for deduction (before risk weighting)			
72	Direct and indirect holdings of own funds and eligible liabilities of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	-	1
73	Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 17.65% thresholds and net of eligible short positions)	700	672
74	not applicable	-	-
75	Deferred tax assets arising from temporary differences (amount below 17.65% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met)	122	123
Applicable cap on the inclusion of provisions in Tier 2			
76	Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)	-	-
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach	170	173
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)	-	-
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	174	192
Capital Instruments subject to phase-out arrangements (only applicable between 1 Jan 2014 and 1 Jan 2022)			
80	Current cap on CET1 instruments subject to phase out arrangements	-	-
81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)	-	-
82	Current cap on AT1 instruments subject to phase out arrangements	-	-
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)	-	-
84	Current cap on T2 instruments subject to phase out arrangements	-	-
85	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)	-	-

As per Article 437 point (a), Table 2.5 below outlines the differences between the scope of accounting consolidation and the scope of regulatory consolidation, showing the link between the Group's balance sheet in the audited financial statements and the numbers that are used in the composition of own funds disclosure template (EU CC1 - Tab 2.4).

Table 2.5 - EU CC2 - Reconciliation of regulatory own funds to balance sheet in the audited financial statements

Balance sheet category	a	b	Reference	a	b
	Jun-25			Dec-24	
	Balance sheet as in published financial statements	Under regulatory scope of consolidation		Balance sheet as in published financial statements	Under regulatory scope of consolidation
	€m	€m		€m	€m
Assets - Breakdown by asset classes according to the balance sheet in the published financial statements					
1 Cash and balances at central banks	27,321	27,321		32,436	32,436
2 Items in the course of collection from other banks	119	119		114	114
3 Trading securities	128	128		166	166
4 Derivative financial instruments	3,318	3,318		3,477	3,481
5 Fair value changes due to interest rate risk of the hedged items in portfolio hedges	235	235		118	118
6 Other financial assets at fair value through profit or loss	23,973	138		24,000	175
7 Loans and advances to banks	1,807	1,807		1,738	1,738
8 Debt securities at amortised cost	12,557	12,557		6,387	6,387
9 Financial assets at fair value through other comprehensive income	3,218	3,218		3,384	3,384
10 Loans and advances to customers	82,212	82,255		82,538	82,650
11 Investments in subsidiaries, joint ventures and associates	238	933	(f)	213	882
12 Intangible assets and goodwill	1,570	1,518		1,500	1,442
13 Investment properties	787	-		771	-
14 Property, plant and equipment	808	808		811	811
15 Current tax assets	47	47	(g)	37	37
16 Deferred tax assets	488	487		546	546
17 Other assets	1,317	152	(h)	1,127	937
18 Reinsurance contract assets	1,398	1,398		1,453	-
19 Retirement benefit assets	835	828		997	995
20 Total assets	162,376	137,266		161,813	136,298
Liabilities - Breakdown by equity and liability classes according to the balance sheet in the published financial statements					
1 Deposits from banks	1,362	1,362		1,805	1,805
2 Customer accounts	104,964	107,070		103,069	103,816
3 Items in the course of transmission to other banks	509	509		218	218
4 Derivative financial instruments	3,128	3,131		3,675	3,675
5 Fair value changes due to interest rate risk of the hedged items in portfolio hedges	(92)	(92)		(365)	(365)
6 Debt securities in issue	8,010	6,846		9,130	9,130
7 Liabilities to customers under investment contracts	9,265	-		9,203	-
8 Insurance contract liabilities	16,513	-		16,685	-
9 Other liabilities	3,072	2,818		2,760	2,410
10 Leasing liabilities	343	343		366	365
11 Current tax liabilities	7	1		29	28
12 Provisions	237	237		235	234
13 Loss allowance provision on loan commitments and financial guarantees	83	83	(i)	80	80
14 Deferred tax liabilities	48	25		58	29
15 Retirement benefit obligations	2	2	(j)	3	3
16 Subordinated liabilities	1,857	1,857		1,853	1,853
17 Total liabilities	149,308	124,193		148,804	123,281
Shareholders' Equity					
1 Capital stock	965	957	(a)	1,003	995
2 Share premium account	456	456	(b)	456	456
3 Retained earnings	10,171	10,107	(c)	10,473	10,736
4 Other reserves	(8)	65	(d)	22	(234)
5 Own stock held for the benefit of life assurance policyholders	(6)	-		(7)	-
6 Other equity instruments - Additional Tier 1	1,485	1,485	(e)	1,059	1,059
7 Non-controlling interests	3	3		3	3
8 Total shareholders' equity	13,068	13,073		13,009	13,017
9 Total equity and liabilities	162,376	137,266		161,813	136,298

As per Article 440(a), Table 2.6 below sets out geographical distribution of credit exposures relevant to the calculation of the countercyclical capital buffer along with the overall additional capital requirement of €797 million at 30 June 2025 (31 December 2024: €822m). CRD provides for a countercyclical buffer that could require banks to hold additional CET 1 capital of up to 2.5%. This requirement is expected to be imposed by the designated authority where credit growth is deemed to be excessive and leading to the build-up of system-wide risk.

Table 2.6a - EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer

	a	b	c	d	e	f	g	h	i	j	k	l	m
	General credit exposures		Relevant credit exposures – Market risk			Own fund requirements							
	Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposure for internal models	Securitisation exposures Exposure value for non-trading book	Total exposure value	Relevant credit risk exposures - Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book	Total	Risk-weighted exposure amounts	Own funds requirement weights (%)	Countercyclical buffer rate (%)
Jun-25 (€m)													
010 Countries with a buffer													
Denmark	0	17	-	-	-	17	1	-	-	1	11	0.02%	2.50%
Iceland	-	0	-	-	-	0	0	-	-	0	0	0.00%	2.50%
Norway	0	1	-	-	-	1	0	-	-	0	0	0.00%	2.50%
Bulgaria	-	0	-	-	-	0	0	-	-	0	0	0.00%	2.00%
Netherlands	1	215	-	-	-	216	13	-	-	13	163	0.38%	2.00%
Sweden	0	27	-	-	-	28	1	-	-	1	18	0.04%	2.00%
United Kingdom	5,066	20,182	-	-	47	25,295	785	0	4	789	9,860	23.20%	2.00%
Croatia	-	0	-	-	-	0	0	-	-	0	0	0.00%	1.50%
Estonia	-	0	-	-	-	0	0	-	-	0	0	0.00%	1.50%
Ireland	13,391	46,947	-	-	4,262	64,601	2,232	1	96	2,329	29,109	68.48%	1.50%
Slovakia	-	0	-	-	-	0	0	-	-	0	0	0.00%	1.50%
Czech Republic	0	0	-	-	-	0	0	-	-	0	0	0.00%	1.25%
Australia	6	17	-	-	-	23	1	-	-	1	11	0.03%	1.00%
Belgium	1	35	-	-	-	36	2	-	-	2	30	0.07%	1.00%
Cyprus	-	1	-	-	-	1	0	-	-	0	1	0.00%	1.00%
France	2	874	-	-	-	876	65	-	-	65	810	1.90%	1.00%
Korea, Republic of	-	0	-	-	-	0	0	-	-	0	0	0.00%	1.00%
Latvia	-	0	-	-	-	0	0	-	-	0	0	0.00%	1.00%
Lithuania	-	0	-	-	-	0	0	-	-	0	0	0.00%	1.00%
Romania	0	0	-	-	-	0	0	-	-	0	0	0.00%	1.00%
Slovenia	-	0	-	-	-	0	0	-	-	0	0	0.00%	1.00%
Germany	1	322	-	-	-	323	22	-	-	22	277	0.65%	0.75%
Chile	-	-	-	-	-	-	-	-	-	-	-	0.00%	0.50%
Hong Kong	0	2	-	-	-	2	0	-	-	0	1	0.00%	0.50%
Hungary	-	0	-	-	-	0	0	-	-	0	0	0.00%	0.50%
Luxembourg	20	449	-	-	-	468	26	-	-	26	324	0.76%	0.50%
Total countries with a buffer	18,488	69,090	-	-	4,310	91,888	3,148	1	100	3,249	40,615	95.55%	
Countries with a zero rate or no buffer													
Other ¹	140	2,106	-	-	1	2,246	151	0	0	151	1,890	4.45%	0.00%
Total	140	2,106	-	-	1	2,246	151	0	0	151	1,890	4.45%	
020 Overall total	18,627	71,196	-	-	4,310	94,133	3,299	1	100	3,400	42,505	100.00%	

As per Article 440 point (b) the following template provides the additional countercyclical capital buffer requirement.

Table 2.6 (b) EU CCyB2 - Amount of institution-specific countercyclical capital buffer

	2025
1 Total risk exposure amount (€m)	a 52,153
2 Institution specific countercyclical capital buffer rate (%)	1.53%
3 Institution specific countercyclical capital buffer requirement (€m)	797

Table 2.6a - EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer

	a	b	c	d	e	f	g	h	i	j	k	l	m
	General credit exposures		Trading Book exposures			Own funds requirements							
	Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short position of trading book	Value of trading book exposure for internal models	Securitisation exposures Exposure value for non-trading book	Total exposure value	Relevant credit risk exposures - Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book	Total	Risk-weighted exposure amounts	Own funds requirement weights	Countercyclical buffer rate
Dec-24 (€m)													
10 Countries with a buffer													
Denmark	0	15	-	-	-	15	1	-	-	1	18	0.04%	2.50%
Iceland	-	0	-	-	-	0	0	-	-	0	0	-	2.50%
Norway	0	0	-	-	-	1	0	-	-	0	0	0.00%	2.50%
Bulgaria	0	0	-	-	-	0	0	-	-	0	0	0.00%	2.00%
Netherlands	1	212	-	-	-	213	16	0	-	16	204	0.44%	2.00%
Sweden	1	22	-	-	-	23	1	-	-	1	18	0.04%	2.00%
United Kingdom	4,725	20,896	-	-	20	25,641	840	0	-	840	10,495	22.60%	2.00%
Armenia	-	-	-	-	-	-	-	-	-	-	-	-	1.50%
Croatia	-	0	-	-	-	0	0	-	-	0	0	-	1.50%
Estonia	0	0	-	-	-	0	0	-	-	0	0	-	1.50%
Ireland	13,648	43,392	-	-	5,626	62,667	2,317	0	145	2,463	30,791	66.31%	1.50%
Slovakia	-	0	-	-	-	0	0	-	-	0	0	0.00%	1.50%
Czech Republic	0	0	-	-	-	0	0	-	-	0	0	0.00%	1.25%
Australia	8	17	-	-	-	25	1	-	-	1	12	0.03%	1.00%
Belgium	1	42	-	-	-	42	4	-	-	4	47	0.10%	1.00%
Cyprus	-	4	-	-	-	4	0	-	-	0	4	0.01%	1.00%
France	42	687	-	-	-	729	67	-	-	67	839	1.81%	1.00%
Korea, Republic of	-	0	-	-	-	0	0	-	-	0	0	0.00%	1.00%
Lithuania	-	0	-	-	-	0	0	-	-	0	0	0.00%	1.00%
Romania	0	0	-	-	-	0	0	-	-	0	0	0.00%	1.00%
Germany	1	317	-	-	-	318	26	-	-	26	320	0.69%	0.75%
Chile	0	-	-	-	-	0	0	-	-	0	0	-	0.50%
Hong Kong	0	2	-	-	-	2	0	-	-	0	1	0.00%	0.50%
Hungary	-	0	-	-	-	0	0	-	-	0	0	0.00%	0.50%
Latvia	-	0	-	-	-	0	0	-	-	0	0	0.00%	0.50%
Luxembourg	62	419	-	-	-	481	40	-	-	40	497	1.07%	0.50%
Slovenia	-	0	-	-	-	0	0	-	-	0	0	0.00%	0.50%
Total countries with a buffer	18,489	66,025	-	-	5,646	90,161	3,314	1	145	3,460	43,246	93.13%	
Countries with a zero rate or no buffer													
Other ¹	202	2,404	-	-	38	2,643	250	0	5	255	3,190	6.87%	0.00%
Total	202	2,404	-	-	38	2,643	250	0	5	255	3,190	6.87%	
20 Overall total	18,691	68,429	-	-	5,684	92,804	3,564	1	150	3,715	46,436	100.00%	

Table 2.6 (b) EU CCyB2 - Amount of institution-specific countercyclical capital buffer

	2024
1 Total risk exposure amount (€m)	a 55,302
2 Institution specific countercyclical capital buffer rate (%)	1.49%
3 Institution specific countercyclical capital buffer requirement (€m)	822

1 The credit exposures amount of individual countries reported within Other countries are not material (individually less than 5% of total credit exposures).

Introduction

Under the standardised approach, risk weightings for rated counterparties are determined on the basis of the external credit rating assigned to the counterparty. For non-rated counterparties and certain other types of exposure, regulatory-determined standardised risk weightings are used.

Exposures rated under the standardised approach amount to €61,349 million (31 December 2024: €61,829 million). The exposure value is presented before credit risk mitigation (“CRM”) and credit conversion factors (“CCF”) and after credit impairment provisions but excluding counterparty credit risk exposures and securitisations.

Use of external credit ratings

Under CRD, institutions are permitted to determine the risk weight of an exposure with reference to the credit assessments of external credit assessment institutions (“ECAIs”).

Risk weights are set out according to each exposure class. In many classes, risk weights are also determined by the credit quality of the exposure, with reference to the credit assessment of External Credit Assessment Institutions (ECAIs).

ECAI are used for the following standardised exposure classes:

- Exposures to central governments or central banks;
- Exposures to regional governments or local authorities;
- Exposures to public sector entities;
- Exposures to multilateral development banks; and
- Exposures to international organisations.

The Group uses external ratings provided by the ECAIs: Fitch Ratings, Moody’s Investors Service and Standard & Poor’s.

ECAI ratings are mapped to risk buckets or ‘credit quality steps’ in accordance with EU Commission implementing regulations.

Risk weights are set out in CRR tables according to these credit quality steps.

The Group has adopted the Foundation IRB approach for its non-retail exposures (Probability of Default (PD) models) and the Advanced IRB approach (including EAD, LGD and PD) for the majority of its retail exposures. Exposures for which capital requirements continue to be determined under the Standardised approach include sovereign and multilateral development bank exposures, the Group’s land and development exposures, certain asset finance and leasing portfolios, non-credit obligation assets and other corporate exposures for which regulatory approval to use the IRB approach is not held.

As per Article 453, points (g), (h) and (i) and Article 444 point (e), Table 3.1 below shows credit risk exposures net of specific credit risk adjustments under the standardised approach both before and after credit risk mitigation (CRM) and credit conversion factors (CCF) and the associated RWAs and RWAs density, split by exposure class. The template excludes counterparty credit risk and securitisation exposures.

Table 3.1 - EU CR4 - Standardised approach - Credit risk exposure and CRM effects

	Exposures before CCF and CRM		Exposures post CCF and CRM		RWEAs and RWEAs density	
	On-balance-sheet	Off-balance-sheet	On-balance-sheet	Off-balance-sheet	RWEAs	RWEAs
	exposures	exposures	exposures	exposures	RWEAs	density (%)
	a	b	c	d	e	f
Jun-25						
Exposure classes	€m	€m	€m	€m	€m	%
1 Central governments or central banks	35,938	47	36,169	47	306	0.85%
2 Non-central government public sector entities	1,005	141	1,058	0	34	3.25%
EU 2a Regional governments or local authorities	317	124	317	0	8	2.43%
EU 2b Public sector entities	688	17	741	-	27	3.59%
3 Multilateral development banks	585	-	776	-	-	-
EU 3a International organisations	1,182	-	1,182	-	-	-
4 Institutions	76	10	192	-	60	31.13%
5 Covered bonds	-	-	-	-	-	-
6 Corporates	2,439	2,158	1,892	193	1,931	92.61%
6.1 Of which: Specialised Lending	3	-	3	-	3	94.61%
7 Subordinated debt exposures and equity	1,027	200	1,027	80	2,306	208.27%
EU 7a Subordinated debt exposures	-	-	-	-	-	-
EU 7b Equity	1,027	200	1,027	80	2,306	208.27%
8 Retail	4,047	779	3,944	73	2,878	71.62%
9 Secured by mortgages on immovable property and ADC exposures	6,886	484	6,885	121	2,843	40.58%
9.1 Secured by mortgages on residential immovable property - non IPRE	5,960	6	5,960	2	1,634	27.40%
9.2 Secured by mortgages on residential immovable property - IPRE	139	0	139	-	33	23.90%
9.3 Secured by mortgages on commercial immovable property - non IPRE	94	20	93	7	52	51.78%
9.4 Secured by mortgages on commercial immovable property - IPRE	10	4	10	2	8	70.78%
9.5 Acquisition, Development and Construction (ADC)	683	455	683	111	1,116	140.65%
10 Exposures in default	255	31	254	10	280	106.36%
EU 10a Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-	-
EU 10b Collective investment undertakings (CIU)	10	-	10	-	120	1250.00%
EU 10c Other items	4,049	-	4,049	-	2,751	67.94%
11 not applicable						
12 TOTAL	57,498	3,851	57,439	524	13,509	23.31%

As per Article 444 point (e), Table 3.2 below analyses exposures at default (EAD) under the standardised approach by risk weight, split by exposure class. All amounts presented are post CRM and CCF and net of specific credit risk adjustments but exclude counterparty credit risk and securitisation exposures.

Table 3.2 - EU CR5 - Standardised approach by exposure class

Jun-25		Risk weight																									Total	of which unrated
		0%	2%	4%	10%	20%	30%	35%	40%	45%	50%	60%	70%	75%	80%	90%	100%	105%	110%	130%	150%	250%	370%	400%	1250%	Others		
		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
Exposure classes																												
1	Central governments or central banks	36,083	-	-	-	12	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	122	-	-	-	-	36,217	36,217
2	Non-central government public sector entities	968	-	-	-	37	-	-	-	-	53	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	1,059	1,059
EU 2a	Regional governments or local authorities	279	-	-	-	37	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	317	317
EU 2b	Public sector entities	688	-	-	-	-	-	-	-	-	53	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	741	741
3	Multilateral development banks	776	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	776	776
EU 3a	International organisations	1,182	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,182	1,182
4	Institutions	-	-	-	-	83	101	-	-	-	-	-	-	-	-	-	1	-	-	-	8	-	-	-	-	-	192	192
5	Covered bonds	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Corporates	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2,085	-	-	-	-	-	-	-	-	-	2,085	2,085
6.1	Of which: Specialised Lending	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3	-	-	-	-	-	-	-	-	-	3	3
7	Subordinated debt exposures and equity	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	109	-	-	-	298	700	-	-	-	-	1,107	1,107
EU 7a	Subordinated debt exposures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
EU 7b	Equity	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	109	-	-	-	298	700	-	-	-	-	1,107	1,107
8	Retail exposures	-	-	-	-	-	-	-	-	71	-	-	-	3,849	-	-	0	-	-	-	-	-	-	-	-	98	4,018	4,018
9	Secured by mortgages on immovable property and ADC exposures	1	-	-	-	5,278	32	1	-	1	0	75	-	772	-	-	185	0	3	-	647	-	-	-	-	11	7,006	7,006
9.1	Secured by mortgages on residential immovable property - non IPRE	0	-	-	-	5,147	27	-	-	-	0	0	-	767	-	-	18	-	-	-	-	-	-	-	-	3	5,962	5,962
9.1.1	No loan splitting applied	-	-	-	-	-	-	-	-	-	-	-	-	14	-	-	18	-	-	-	-	-	-	-	-	0	31	31
9.1.2	loan splitting applied (secured)	-	-	-	-	5,147	27	-	-	-	-	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	5,174	5,174
9.1.3	loan splitting applied (unsecured)	0	-	-	-	-	-	-	-	-	0	-	-	753	-	-	1	-	-	-	-	-	-	-	-	3	756	756
9.2	Secured by mortgages on residential immovable property - IPRE	-	-	-	-	126	5	1	-	1	-	-	6	-	-	-	-	0	-	-	1	-	-	-	-	0	139	139
9.3	Secured by mortgages on commercial immovable property - non IPRE	1	-	-	-	5	-	-	-	-	0	75	-	-	-	-	19	-	-	-	-	-	-	-	-	-	100	100
9.3.1	No loan splitting applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	10	-	-	-	-	-	-	-	-	-	10	10
9.3.2	loan splitting applied (secured)	-	-	-	-	5	-	-	-	-	-	75	-	-	-	-	-	-	-	-	-	-	-	-	-	-	80	80
9.3.3	loan splitting applied (unsecured)	1	-	-	-	-	-	-	-	-	0	-	-	-	-	-	9	-	-	-	-	-	-	-	-	-	10	10
9.4	Secured by mortgages on commercial immovable property - IPRE	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3	-	0	-	-	-	-	8	12	12
9.5	Acquisition, Development and Construction (ADC)	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	148	-	-	-	645	-	-	-	-	-	793	793
10	Exposures in default	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	230	-	-	-	34	-	-	-	-	-	263	263
EU 10a	Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
EU 10b	Collective investment undertakings (CIU)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	10	-	10	10
EU 10c	Other items	163	-	-	-	548	-	-	-	-	328	-	-	-	-	-	2,263	-	-	-	-	-	-	-	-	747	4,049	4,049
11	not applicable																											
EU 11c	TOTAL	39,173	-	-	-	5,958	132	1	-	71	381	75	-	4,621	-	-	4,874	0	3	-	987	821	-	-	10	856	57,963	57,963

As per Article 452, point (g)(i)-(v), Table 3.3 below presents the key parameters used for the calculation of capital requirements for credit risk exposures, under the Foundation IRB approach, split by PD range. All exposures are presented both pre and post CRM and CCF (EAD). The template excludes counterparty credit risk and securitisations.

Table 3.3 EU CR6 - IRB approach - Credit risk exposures by exposure class and PD range (Foundation IRB)

Jun-25 PD Range	On-balance sheet exposures	Off- balance- sheet exposures pre-CCF	Exposure weighted average CCF	Exposure post CCF and post CRM	Exposure weighted average PD	Number of obligors	Exposure weighted average LGD	Exposure weighted average maturity (years)	Risk weighted exposure amount after supporting factors	Density of risk weighted exposure amount	Expected loss amount	Value adjustments and provisions
	€m	€m	%	€m	%		%		€m	%	€m	€m
	a	b	c	d	e	f	g	h	i	j	k	l
Total Foundation IRB												
0.00 to <0.15	5,269	1,757	27.74%	5,757		311		2.5	846	14.70%	1	(3)
0.00 to <0.10	4,959	820	49.21%	5,362		235		2.5	718	13.39%	1	(3)
0.10 to <0.15	311	937	8.95%	394		76		2.5	129	32.60%	0	(.3)
0.15 to <0.25	411	1,054	36.37%	794		118		2.5	305	38.44%	1	(1)
0.25 to <0.50	1,373	953	23.01%	1,593		243		2.5	714	44.82%	2	(5)
0.50 to <0.75	1,337	1,327	18.45%	1,582		400		2.5	888	56.15%	4	(7)
0.75 to <2.50	5,172	2,672	37.90%	6,184		1,788		2.5	4,483	72.49%	32	(53)
0.75 to <1.75	4,417	1,893	44.40%	5,258		1,265		2.5	3,655	69.53%	24	(37)
1.75 to <2.5	755	778	22.07%	927		523		2.5	827	89.29%	8	(16)
2.50 to <10.00	6,053	998	24.47%	6,297		2,800		2.5	5,266	83.63%	101	(122)
2.5 to <5	4,700	708	29.46%	4,909		2,269		2.5	3,919	79.83%	66	(75)
5 to <10	1,353	290	12.28%	1,388		531		2.5	1,347	97.06%	35	(46)
10.00 to <100.00	1,179	156	22.06%	1,213		591		2.5	1,579	130.16%	80	(102)
10 to <20	958	135	18.39%	983		378		2.5	1,218	123.89%	47	(64)
20 to <30	79	9	43.01%	83		54		2.5	134	160.48%	8	(9)
30 to <100.00	142	11	48.65%	147		159		2.5	228	154.91%	25	(30)
100.00 (Default)	678	46	37.09%	695		260		2.5	-	0.00%	266	(277)
Total Foundation IRB	21,472	8,963	29.49%	24,115		6,511		2.5	14,082	58.39%	486	(569)
Institutions												
0.00 to <0.15	5,037	258	84.08%	5,254	0.06%	141	22.78%	2.5	741	14.10%	1	(1)
0.00 to <0.10	4,829	258	84.08%	5,046	0.06%	128	22.15%	2.5	664	13.16%	1	(1)
0.10 to <0.15	208	-	0.00%	208	0.13%	13	38.02%	2.5	77	36.89%	0	(0)
0.15 to <0.25	0	-	0.00%	0	0.20%	2	45.00%	2.5	0	45.42%	0	(0)
0.25 to <0.50	1	27	100.00%	27	0.36%	4	45.00%	2.5	21	78.31%	0	(0)
0.50 to <0.75	0	10	100.00%	10	0.59%	2	45.00%	2.5	10	97.49%	0	(0)
0.75 to <2.50	0	0	100.00%	1	1.93%	5	45.00%	2.5	1	120.09%	0	(0)
0.75 to <1.75	0	-	0.00%	0	1.11%	3	45.00%	2.5	0	121.99%	0	(0)
1.75 to <2.5	0	0	100.00%	1	2.09%	2	45.00%	2.5	1	119.73%	0	(0)
2.50 to <10.00	-	-	0.00%	-	0.00%	-	0.00%	-	-	0.00%	-	-
2.5 to <5	-	-	0.00%	-	0.00%	-	0.00%	-	-	0.00%	-	-
5 to <10	-	-	0.00%	-	0.00%	-	0.00%	-	-	0.00%	0	-
10.00 to <100.00	0	-	0.00%	0	46.26%	1	45.00%	2.5	0	246.72%	0	(0)
10 to <20	-	-	0.00%	-	0.00%	-	0.00%	-	-	0.00%	-	-
20 to <30	-	-	0.00%	-	0.00%	-	0.00%	-	-	0.00%	-	-
30 to <100.00	0	-	0.00%	0	46.26%	1	45.00%	2.5	0	246.72%	0	(0)
100.00 (Default)	-	-	0.00%	-	0.00%	-	0.00%	-	-	0.00%	-	-
Total Institutions	5,038	296	86.09%	5,292	0.06%	155	22.94%	2.5	773	14.61%	1	(1)
Corporates of which General												
0.00 to <0.15	230	1,499	18.04%	501	0.08%	167	39.25%	2.5	106	21.08%	0	(2)
0.00 to <0.10	127	562	33.20%	314	0.06%	104	38.81%	2.5	54	17.06%	0	(2)
0.10 to <0.15	103	937	8.95%	187	0.11%	63	40.00%	2.5	52	27.84%	0	(0)
0.15 to <0.25	340	1,054	36.37%	723	0.22%	111	39.61%	2.5	288	39.84%	1	(1)
0.25 to <0.50	968	901	20.28%	1,151	0.36%	211	35.33%	2.5	506	43.98%	2	(4)
0.50 to <0.75	1,090	1,303	17.97%	1,324	0.58%	294	36.61%	2.5	767	57.93%	3	(6)
0.75 to <2.50	3,556	2,503	37.89%	4,504	1.38%	1,344	36.39%	2.5	3,381	75.06%	24	(42)
0.75 to <1.75	2,968	1,726	45.03%	3,746	1.23%	951	35.85%	2.5	2,660	71.02%	18	(28)
1.75 to <2.5	588	777	22.02%	759	2.07%	393	39.01%	2.5	721	95.04%	6	(14)
2.50 to <10.00	4,454	928	25.52%	4,690	4.23%	2,392	32.12%	2.5	3,816	81.35%	68	(90)
2.5 to <5	3,784	655	31.20%	3,989	3.72%	2,065	32.62%	2.5	3,175	79.59%	53	(68)
5 to <10	669	272	11.86%	702	7.13%	327	29.28%	2.5	641	91.41%	15	(22)
10.00 to <100.00	683	143	20.69%	712	17.80%	496	32.75%	2.5	896	125.80%	44	(67)
10 to <20	543	132	18.14%	567	12.87%	302	32.14%	2.5	668	117.76%	23	(42)
20 to <30	31	1	76.73%	32	20.16%	39	36.50%	2.5	49	155.27%	3	(2)
30 to <100.00	109	10	49.48%	114	41.80%	155	34.76%	2.5	179	157.73%	18	(22)
100.00 (Default)	379	45	37.10%	396	100.00%	215	35.69%	2.5	-	0.00%	146	(169)
Total Corporates of which General	11,699	8,377	27.49%	14,001	5.69%	5,230	34.96%	2.5	9,760	69.71%	288	(381)
Corporates of which Specialised lending												
0.00 to <0.15	3	0	39.98%	3	0.05%	3	40.00%	2.5	0	10.43%	0	(0)
0.00 to <0.10	3	0	39.98%	3	0.05%	3	40.00%	2.5	0	10.43%	0	(0)
0.10 to <0.15	0	-	0.00%	0	0.00%	-	0.00%	-	0	0.00%	-	-
0.15 to <0.25	71	-	0.00%	71	0.17%	5	40.00%	2.5	17	24.07%	0	(0)
0.25 to <0.50	405	25	39.08%	415	0.42%	28	39.90%	2.5	186	44.96%	1	(1)
0.50 to <0.75	247	13	2.17%	248	0.61%	104	40.00%	2.5	111	44.89%	1	(1)
0.75 to <2.50	1,616	168	37.86%	1,679	1.17%	439	39.59%	2.5	1,101	65.56%	8	(10)
0.75 to <1.75	1,449	167	37.90%	1,512	1.07%	311	39.55%	2.5	995	65.83%	6	(9)
1.75 to <2.5	167	1	31.85%	167	2.09%	128	40.00%	2.5	106	63.10%	1	(2)
2.50 to <10.00	1,599	71	10.70%	1,606	5.11%	408	39.95%	2.5	1,450	90.27%	33	(31)
2.5 to <5	916	53	8.00%	920	3.29%	204	39.91%	2.5	744	80.90%	12	(7)
5 to <10	683	18	18.75%	687	7.55%	204	40.00%	2.5	706	102.82%	21	(24)
10.00 to <100.00	496	12	37.91%	501	17.91%	94	40.00%	2.5	683	136.36%	36	(36)
10 to <20	415	3	30.66%	416	14.43%	76	40.00%	2.5	550	132.25%	24	(21)
20 to <30	48	9	40.00%	52	26.29%	15	40.00%	2.5	85	163.66%	5	(7)
30 to <100.00	33	1	40.00%	34	48.12%	3	40.00%	2.5	49	145.26%	6	(7)
100.00 (Default)	299	1	36.99%	299	100.00%	45	40.00%	2.5	-	0.00%	120	(108)
Total Corporates of which Specialised lending	4,735	291	29.72%	4,822	10.25%	1,126	39.83%	2.5	3,549	73.61%	198	(186)

As per Article 452, point (g)(i)-(v), Table 3.4 below presents the key parameters used for the calculation of capital requirements for credit risk exposures, under the Advanced IRB approach, split by PD range. Average maturity is not a component of the Advanced IRB RWA formula and is therefore not reported in the tables below. All exposures are presented both pre and post CRM and CCF (EAD). The template excludes counterparty credit risk and securitisations.

Table 3.4 EU CR6 - IRB approach - Credit risk exposures by exposure class and PD range (Advanced IRB)

	On-balance sheet exposures	Off-balance- sheet exposures pre- CCF	Exposure weighted average CCF	Exposure post CCF and post CRM	Exposure weighted average PD	Number of obligors	Exposure weighted average LGD	Exposure weighted average maturity (years)	Risk weighted exposure amount after supporting factors	Density of risk weighted exposure amount	Expected loss amount	Value adjustments and provisions
Jun-25 PD Range	€m a	€m b	% c	€m d	% e	f	% g	h	€m i	% j	€m k	€m l
Total Advanced IRB												
0.00 to <0.15	5,331	830	33.99%	5,641		232,902			429	7.61%	2	(4)
0.00 to <0.10	5,278	120	62.47%	5,381		61,923			417	7.75%	2	(4)
0.10 to <0.15	53	710	29.19%	260		170,979			12	4.75%	0	(0)
0.15 to <0.25	13,757	659	42.65%	14,093		211,223			1,554	11.03%	7	(11)
0.25 to <0.50	3,266	643	41.72%	3,551		128,795			496	13.96%	3	(6)
0.50 to <0.75	15,190	3,580	98.45%	18,766		104,675			5,644	30.08%	36	(12)
0.75 to <2.50	5,164	769	52.94%	5,587		262,014			2,418	43.28%	27	(22)
0.75 to <1.75	3,658	720	51.91%	4,045		212,260			1,590	39.32%	17	(14)
1.75 to <2.5	1,506	49	68.26%	1,543		49,754			828	53.66%	11	(7)
2.50 to <10.00	2,578	272	34.48%	2,676		179,493			2,143	80.07%	80	(40)
2.5 to <5	1,765	106	49.77%	1,816		90,851			1,343	73.98%	41	(21)
5 to <10	814	166	27.08%	860		88,642			799	92.93%	39	(20)
10.00 to <100.00	806	30	53.87%	827		112,432			1,102	133.30%	74	(39)
10 to <20	434	19	53.42%	448		91,876			618	138.13%	30	(17)
20 to <30	56	7	42.52%	59		12,541			86	146.67%	11	(7)
30 to <100.00	316	4	78.99%	320		8,015			397	124.08%	34	(15)
100.00 (Default)	730	11	44.15%	735		32,161			600	81.68%	282	(225)
Total Advanced IRB	46,823	6,795	71.80%	51,876		1,263,695			14,386	27.73%	512	(358)

Secured by residential property - Non SME

0.00 to <0.15	5,277	6	100.00%	5,310	0.08%	28,113	35.52%		415	7.82%	2	(4)
0.00 to <0.10	5,277	6	100.00%	5,310	0.08%	28,099	35.52%		415	7.82%	2	(4)
0.10 to <0.15	0	0	100.00%	0	0.14%	14	78.87%		0	22.05%	0	(0)
0.15 to <0.25	13,669	63	100.00%	13,787	0.19%	72,020	27.65%		1,531	11.10%	7	(10)
0.25 to <0.50	3,145	31	100.00%	3,191	0.34%	25,867	21.03%		425	13.32%	2	(3)
0.50 to <0.75	15,148	3,473	100.00%	18,672	0.60%	79,689	32.11%		5,610	30.04%	36	(10)
0.75 to <2.50	4,245	181	100.00%	4,442	1.32%	43,426	24.78%		1,727	38.88%	14	(9)
0.75 to <1.75	2,981	166	100.00%	3,160	1.05%	28,156	25.10%		1,088	34.43%	8	(5)
1.75 to <2.5	1,264	15	100.00%	1,282	1.97%	15,270	24.00%		639	49.86%	6	(4)
2.50 to <10.00	1,064	4	100.00%	1,072	4.55%	13,240	25.32%		881	82.15%	12	(11)
2.5 to <5	748	1	100.00%	752	3.70%	10,496	25.98%		575	76.45%	7	(6)
5 to <10	316	3	100.00%	320	6.53%	2,744	23.78%		306	95.55%	5	(5)
10.00 to <100.00	619	4	100.00%	627	27.63%	5,267	23.79%		858	136.82%	38	(20)
10 to <20	318	2	100.00%	323	16.19%	2,386	26.56%		486	150.58%	14	(9)
20 to <30	7	-	0.00%	7	24.20%	42	18.84%		8	116.33%	0	(0)
30 to <100.00	294	2	100.00%	297	40.14%	2,839	20.89%		364	122.35%	24	(10)
100.00 (Default)	585	3	100.00%	588	100.00%	4,667	26.48%		472	80.28%	148	(133)
Total Secured by residential property - Non SME	43,751	3,766	100.00%	47,689	2.14%	272,289	29.44%		11,918	24.99%	259	(201)

Qualifying revolving

0.00 to <0.15	52	824	33.53%	329	0.10%	204,681	69.40%		14	4.28%	0	(0)
0.00 to <0.10	0	114	60.57%	69	0.05%	33,771	78.72%		2	2.65%	0	(0)
0.10 to <0.15	52	710	29.19%	259	0.12%	170,910	66.91%		12	4.72%	0	(0)
0.15 to <0.25	76	483	39.54%	267	0.20%	129,707	60.83%		18	6.65%	0	(1)
0.25 to <0.50	72	248	47.52%	190	0.39%	73,648	59.95%		22	11.42%	0	(1)
0.50 to <0.75	7	31	66.97%	27	0.72%	19,139	77.99%		6	23.17%	0	(0)
0.75 to <2.50	170	459	36.11%	336	1.19%	147,536	62.01%		96	28.53%	3	(3)
0.75 to <1.75	160	441	35.50%	317	1.12%	134,030	61.30%		86	27.02%	2	(2)
1.75 to <2.5	10	18	50.97%	20	2.28%	13,506	73.57%		10	52.87%	0	(0)
2.50 to <10.00	118	231	30.35%	188	4.16%	96,367	61.35%		130	69.05%	5	(3)
2.5 to <5	70	76	43.23%	103	3.01%	37,673	57.40%		54	51.99%	2	(1)
5 to <10	47	155	24.06%	85	5.55%	58,694	66.15%		76	89.80%	3	(2)
10.00 to <100.00	46	20	43.30%	56	19.66%	91,829	56.20%		80	143.34%	6	(4)
10 to <20	25	14	44.49%	32	11.88%	83,124	57.00%		39	121.79%	2	(2)
20 to <30	21	6	40.79%	24	29.87%	8,651	55.15%		42	171.60%	4	(3)
30 to <100.00	0	0	52.14%	0	39.52%	54	77.21%		0	236.87%	0	(0)
100.00 (Default)	19	4	0.00%	19	100.00%	15,610	78.80%		41	218.17%	12	(12)
Total Qualifying revolving	560	2,300	36.96%	1,411	3.06%	778,517	63.44%		406	28.79%	26	(24)

Retail of which Other retail exposures

0.00 to <0.15	2	0	58.52%	2	0.09%	108	45.34%		0	11.60%	0	(0)
0.00 to <0.10	1	0	52.14%	1	0.08%	53	44.56%		0	9.67%	0	(0)
0.10 to <0.15	1	0	61.71%	1	0.12%	55	46.28%		0	13.95%	0	(0)
0.15 to <0.25	13	113	23.91%	40	0.18%	9,496	41.27%		6	14.19%	0	(0)
0.25 to <0.50	49	364	32.80%	170	0.34%	29,280	58.66%		49	28.85%	1	(2)
0.50 to <0.75	36	77	40.85%	67	0.64%	5,847	56.60%		28	42.36%	0	(1)
0.75 to <2.50	749	129	46.63%	808	1.46%	71,052	65.65%		595	73.58%	10	(10)
0.75 to <1.75	517	113	45.08%	568	1.26%	50,074	67.36%		417	73.40%	6	(7)
1.75 to <2.5	232	16	57.83%	241	1.92%	20,978	61.63%		178	74.01%	4	(3)
2.50 to <10.00	1,397	37	53.81%	1,416	4.60%	69,886	60.75%		1,132	79.96%	63	(26)
2.5 to <5	946	29	51.75%	961	3.52%	42,682	58.67%		715	74.40%	32	(13)
5 to <10	451	8	60.89%	455	6.88%	27,204	65.12%		418	91.67%	31	(12)
10.00 to <100.00	141	6	55.08%	144	19.78%	15,336	62.91%		164	114.02%	30	(15)
10 to <20	91	3	58.64%	93	12.98%	6,366	63.00%		93	100.46%	14	(6)
20 to <30	27	1	56.44%	28	23.21%	3,848	62.94%		37	132.51%	7	(4)
30 to <100.00	22	1	45.58%	23	43.08%	5,122	62.50%		34	146.35%	10	(5)
100.00 (Default)	126	4	49.94%	128	100.00%	11,884	61.54%		87	68.26%	122	(79)
Total Retail of which Other retail exposures	2,512	729	36.05%	2,775	8.44%	212,889	61.81%		2,062	74.29%	226	(134)

As per Article 453 point (j), Table 3.5 below illustrates the effect of credit derivatives on the IRB approach capital requirements calculations. The template excludes counterparty credit risk and securitisations.

Table 3.5 - EU CR7 – IRB approach – Effect on the RWEAs of credit derivatives used as CRM techniques

Jun-25	
Pre-credit derivatives risk weighted exposure amount €m a	Actual risk weighted exposure amount €m b
1 Central governments and central banks - F-IRB	-
EU 1a Regional governments and local authorities -F-IRB	-
EU 1b Public sector entities - F-IRB	-
2 Central governments and central banks - A-IRB	-
EU 2a Regional governments and local authorities A-IRB	-
EU 2b Public sector entities A-IRB	-
3 Institutions – F-IRB	773
4 not applicable	
5 Corporates – F-IRB	13,309
EU 5a Corporates - General	9,760
EU 5b Corporates - Specialised lending	3,549
EU 5c Corporates - Purchased receivables	-
6 Corporate – A-IRB	-
EU 6a Corporates - General	-
EU 6b Corporates - Specialised lending	-
EU 6c Corporates - Purchased receivables	-
7 not applicable	
8 not applicable	
EU 8a Retail - A-IRB	14,386
9 Retail – Qualifying revolving (QRRE)	406
10 Retail – Secured by residential immovable property	11,918
EU 10a Retail – Purchased receivables	-
EU 10b Retail- Other retail exposures	2,062
11 not applicable	
12 not applicable	
13 not applicable	
14 not applicable	
15 not applicable	
16 not applicable	
17 Exposures under F-IRB	14,082
18 Exposures under A-IRB	14,386
19 Total Exposures	28,469

As per Article 453 point (g), Table 3.6 below discloses more granular information on the type of CRM techniques by type and exposure class under the IRB approach.

Table 3.6 - EU CR7-A – IRB approach – Disclosure of the extent of the use of CRM techniques

	Total exposures	Credit risk Mitigation techniques										Credit risk Mitigation methods in the calculation of RWEAs		
		Funded credit Protection (FCP)								Unfunded credit Protection (UFCP)		RWEA without substitution effects (reduction effects only)	RWEA with substitution effects (both reduction and substitution effects)	
		Part of exposures covered by Financial Collaterals (%)	Part of exposures covered by Other eligible collaterals (%)	Part of exposures covered by Immovable property Collaterals (%)	Part of exposures covered by Receivables (%)	Part of exposures covered by Other physical collateral (%)	Part of exposures covered by Other funded credit protection (%)	Part of exposures covered by Cash on deposit (%)	Part of exposures covered by Life insurance policies (%)	Part of exposures covered by Instruments held by a third party (%)	Part of exposures covered by Guarantees (%)			Part of exposures covered by Guarantees (%)
Jun-25	€m	%	%	%	%	%	%	%	%	%	%	€m	€m	
Exposures under A-IRB	a	b	c	d	e	f	g	h	i	j	k	l	m	n
1 Central governments and central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2 Regional governments and local authorities	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3 Public sector entities	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5 Corporates	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5.1 Corporates - General	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5.2 Corporates - Specialised lending	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5.3 Corporates - Purchased receivables	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6 Retail	51,876	-	86.73%	86.73%	-	-	-	-	-	-	-	-	14,562	14,386
6.1 Retail – Qualifying revolving	1,411	-	-	-	-	-	-	-	-	-	-	-	406	406
6.2 Retail – secured by residential immovable property	47,689	-	94.35%	94.35%	-	-	-	-	-	-	-	-	11,918	11,918
6.3 Retail - Purchased Receivables	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6.4 Retail - Other retail exposures	2,775	-	-	-	-	-	-	-	-	-	-	-	2,238	2,062
7 Total	51,876	-	86.73%	86.73%	-	-	-	-	-	-	-	-	14,562	14,386
Exposures under F-IRB														
1 Central governments and central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2 Regional governments and local authorities	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3 Public sector entities	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4 Institutions	5,292	-	-	-	-	-	-	-	-	-	-	-	773	773
5 Corporates	18,823	0.33%	18.31%	18.31%	-	-	-	-	-	-	-	-	13,628	13,309
5.1 Corporates - General	14,001	0.30%	24.62%	24.62%	-	-	-	-	-	-	-	-	10,075	9,760
5.2 Corporates - Specialised lending	4,822	0.42%	-	-	-	-	-	-	-	-	-	-	3,554	3,549
5.3 Corporates - Purchased receivables	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6 Total	24,115	0.26%	14.29%	14.29%	-	-	-	-	-	-	-	-	14,401	14,082

As per Article 438 point (h), Table 3.7 below analyses the movements in risk weighted exposure amounts under the IRB approach within the period.

Table 3.7 - EU CR8 – RWEA flow statements of credit risk exposures under the IRB approach

	Risk weighted exposure amount €m
	a
1 Risk weighted exposure amount as at the end of the previous reporting period - March '25	28,144
2 Asset size (+/-) ¹	786
3 Asset quality (+/-) ²	(274)
4 Model updates (+/-) ³	94
5 Methodology and policy (+/-) ⁴	-
6 Acquisitions and disposals (+/-) ⁵	-
7 Foreign exchange movements (+/-)	(281)
8 Other (+/-) ⁶	-
9 Risk weighted exposure amount as at the end of the reporting period - June '25	28,469

	Risk weighted exposure amount €m
	a
1 Risk weighted exposure amount as at the end of the previous reporting period - December '24	31,358
2 Asset size (+/-) ¹	297
3 Asset quality (+/-) ²	333
4 Model updates (+/-) ³	335
5 Methodology and policy (+/-) ⁴	(4,026)
6 Acquisitions and disposals (+/-) ⁵	-
7 Foreign exchange movements (+/-)	(153)
8 Other (+/-) ⁶	-
9 Risk weighted exposure amount as at the end of the reporting period - March '25	28,144

1 Asset size: This represents movements in RWA driven by changes in the composition of the Group's existing portfolios. This includes, but is not limited to: constant currency growth in existing portfolios including new business and repayment of loans, changes in the product mix.

2 Asset quality: This can represent movements in RWA including but not limited to: PD Migration and LGD changes driven by economic conditions, changes in lending practices, demographics and model re-calibrations and re-anchoring.

3 Model updates: This can represent movements in RWA including, but is not limited to: new model approvals, refinements and enhancements to improve model performance.

4 Methodology and policy: Updates to the RWA calculation methodology, communicated by the Regulator in particular the impact of CRR III.

5 Acquisitions and disposals: This can represent movements in RWA due to changes in book sizes as a result of acquisitions and/or disposals.

6 Other comprises movements in non-credit RWA items and unconsolidated intragroup investments.

As per Article 438 point (e), Table 3.8 below shows equity exposures under the simple risk-weighted approach.

Table 3.8 - EU CR10.5 – Equity exposures under Articles 133 (3) to (6) and 495a(3) CRR¹

Categories	Equity exposures under Articles 133 (3) to (6) and 495a(3) CRR						Expected loss amount
	On-balance sheet exposure	Off-balance sheet exposure		Risk weight	Exposure value	Risk weighted exposure amount	
	a	b	c	d	e	f	
	€m	€m		€m	€m	€m	
Articles 133 (3)	245	200	250%	325	474	-	
Articles 133 (5)	82	-	100%	82	82	-	
Total	327	200		407	556	-	

1. The above table therefore does not include equity exposures in insurance subsidiaries which are risk weighted under Article 48(4).

As per Article 442, points (c) and (e), Table 3.9 below presents gross carrying amount (including accrued interest) of performing and non-performing exposures and the related accumulated impairment, provisions, accumulated change in fair value due to credit risk, accumulated partial write-off, and collateral and financial guarantees received, according to the scope of regulatory consolidation. The Group's non performing loans (NPL) are 2.58% at June 2025 (2.2% December 2024).

Table 3.9 - EU CR1 - Performing and non-performing exposures and related provisions

As per Article 442 point (g), Table 3.10 below provides a breakdown of gross carrying amount by residual contractual maturities net of related accumulated impairment, provisions, accumulated change in fair value due to credit risk.

Table 3.10 - EU CR1-A - Maturity of exposures

	a	b	c		d	e	f
	On demand	<= 1 year	Net exposure value			No stated maturity	Total
	€m	€m	> 1 year <= 5 years	> 5 years	€m	€m	€m
Jun-25							
1 Loans and advances	1,902	12,466	29,995	39,727	160		84,250
2 Debt securities	0	2,137	6,355	7,414	10		15,916
3 Total	1,902	14,603	36,350	47,141	170		100,166

	a	b	c		d	e	f
	On demand	<=1 year	Net exposure value			No stated maturity	Total
	€m	€m	>1 year <= 5 years	>5 years	€m	€m	€m
Dec-24							
1 Loans and advances	1,724	13,036	30,744	39,044	131		84,679
2 Debt securities	-	767	6,169	2,937	22		9,895
3 Total	1,724	13,803	36,913	41,982	152		94,574

As per Article 442, point (f), Table 3.11 below presents movements of gross carrying amounts (including accrued interest) of non performing loans and advances during the period. The non-performing values in this template are in accordance with Article 178 default of an obligor.

Table 3.11 - EU CR2 - Changes in the stock of non-performing loans and advances

	Jun-25	Dec-24
	a	a
	Gross carrying	Gross carrying
	amount	amount
	€m	€m
010 Initial stock of non-performing loans and advances	1,885	2,537
020 Inflows to non-performing portfolios	821	1,034
030 Outflows from non-performing portfolios	(500)	(1,687)
040 Outflows due to write-offs	(57)	(358)
050 Outflow due to other situations	(443)	(1,328)
060 Final stock of non-performing loans and advances	2,206	1,885

[Previous](#)
[Index](#)
[Next](#)

As per Article 442 point (c), Table 3.12 below presents the gross carrying amount (including accrued interest) of forborne exposures and the related accumulated impairment, provisions, accumulated change in fair value due to credit risk, and collateral and financial guarantees received, according to the scope of regulatory consolidation.

Table 3.12 - EU CQ1 - Credit quality of forborne exposures

		a	b	c	d	e	f	g	h
		Gross carrying amount/nominal amount of exposures with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collateral received and financial guarantees received on forborne exposures	
		Performing forborne	Non-performing forborne		On performing forborne exposures On non-performing forborne exposures				
				Of which defaulted			Of which impaired		
Jun-25		€m	€m	€m	€m	€m	€m	€m	€m
005	Cash balances at central banks and other demand deposits	-	-	-	-	-	-	-	-
010	Loans and advances	1,837	1,226	1,199	1,189	(99)	(425)	1,331	449
020	Central banks	-	-	-	-	-	-	-	-
030	General governments	-	0	0	0	-	(0)	-	-
040	Credit institutions	-	-	-	-	-	-	-	-
050	Other financial corporations	6	0	0	0	(1)	(0)	5	-
060	Non-financial corporations	1,599	917	893	882	(94)	(368)	854	201
070	Households	231	309	306	307	(4)	(56)	472	248
080	Debt Securities	-	-	-	-	-	-	-	-
090	Loan commitments given	170	12	11	11	1	0	-	-
100	Total	2,006	1,238	1,210	1,200	(101)	(425)	1,331	449

		a	b	c	d	e	f	g	h
		Gross carrying amount/nominal amount of exposures with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collateral received and financial guarantees received on forborne exposures	
		Performing forborne	Non-performing forborne		On performing forborne exposures On non-performing forborne exposures				
				Of which defaulted			Of which impaired		
Dec-24		€m	€m	€m	€m	€m	€m	€m	€m
005	Cash balances at central banks and other demand deposits	-	-	-	-	-	-	-	-
010	Loans and advances	2,390	941	938	920	(105)	(299)	1,571	395
020	Central banks	-	-	-	-	-	-	-	-
030	General governments	-	0	0	0	-	()	-	-
040	Credit institutions	-	-	-	-	-	-	-	-
050	Other financial corporations	0	0	0	0	()	()	-	-
060	Non-financial corporations	2,170	645	643	625	(102)	(251)	1,116	154
070	Households	219	296	295	295	(4)	(49)	454	241
080	Debt Securities	-	-	-	-	-	-	-	-
090	Loan commitments given	258	44	44	43	2	2	-	-
100	Total	2,647	986	981	963	(108)	(301)	1,571	395

Previous

Index

Next

As per Article 442, points (c) and (e), Table 3.13 below presents gross carrying amount (includes accrued interest) of performing and non-performing exposures and the related accumulated impairment, provisions and accumulated change in fair value due to credit risk, according to the scope of regulatory consolidation.

Table 3.13 - EU CQ4 - Quality of non-performing exposures by geography

		a	b ²	c	d ²	e	f	g
		Gross carrying/nominal amount			Of which subject to impairment	Accumulated impairment	Provisions on off-balance-sheet commitments and financial guarantees given	Accumulated negative changes in fair value due to credit risk on non-performing exposures
		Of which non-performing						
			Of which defaulted					
Jun-25		€m	€m	€m	€m	€m	€m	€m
010	On-balance-sheet exposures	128,727		2,173		(1,189)		-
020	Ireland	82,546		943		(528)		-
030	United Kingdom	28,464		554		(222)		-
070	Other countries ¹	17,717		676		(439)		-
080	Off-balance-sheet exposures	18,988		109			83	
090	Ireland	13,862		40			47	
100	United Kingdom	3,277		60			20	
140	Other countries ¹	1,848		10			16	
150	Total	147,715		2,282		(1,189)	83	-

		a	b ²	c	d ²	e	f	g
		Gross carrying/nominal amount			Of which subject to impairment	Accumulated impairment	Provisions on off-balance-sheet commitments and financial guarantees	Accumulated negative changes in fair value due to credit risk on non-performing exposures
		Of which non-performing						
				Of which defaulted				
Dec-24 ³		€m	€m	€m	€m	€m	€m	€m
010	On-balance-sheet exposures	127,839		1,874		(1,035)		-
020	Ireland	85,842		956		(568)		-
030	United Kingdom	29,572		569		(220)		-
070	Other countries ¹	12,425		349		(246)		-
080	Off-balance-sheet exposures	18,744		140			80	
090	Ireland	13,178		68			46	
100	United Kingdom	3,541		69			25	
140	Other countries ¹	2,024		3			9	
150	Total	146,583		2,014		(1,035)	80	-

1 The gross carrying / nominal amount of individual countries reported within Other countries are not material (individually less than 5% of total gross carrying / nominal amount). Exposures to supranational organisations are assigned to 'Other countries'.

2 In line with the requirements for large institutions with an NPL ratio (in accordance with Regulation (EU) 2021/637) lower than 5%, columns "Of which non-performing" and "of which subject to impairment" are not required to be disclosed.

3 Updated values to reflect the inclusion of Cash balances at central banks and other demand deposits.

As per Article 442, points (c) and (e), Table 3.14 below presents gross carrying amount (including accrued interest) of loans and advances to non-financial corporations by industry and the related accumulated impairment and accumulated change in fair value due to credit risk, according to the scope of regulatory consolidation.

Table 3.14 - EU CQ5 - Credit quality of loans and advances to non-financial corporations by industry

	a	b ¹	c	d ¹	e	f
	Gross carrying amount				Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
	Of which non-performing		Of which loans and advances subject to impairment			
		Of which defaulted				
Jun-25	€m	€m	€m		€m	€m
010 Agriculture, forestry and fishing	1,720		55		(43)	-
020 Mining and quarrying	113		16		(6)	-
030 Manufacturing	4,118		190		(161)	-
040 Electricity, gas, steam and air conditioning supply	535		21		(18)	-
050 Water supply	96		-		(1)	-
060 Construction	370		14		(10)	-
070 Wholesale and retail trade	2,308		42		(47)	-
080 Transport and storage	817		90		(59)	-
090 Accommodation and food service activities	1,477		58		(26)	-
100 Information and communication	355		26		(26)	-
110 Financial and insurance activities	49				()	-
120 Real estate activities	7,716		434		(244)	-
130 Professional, scientific and technical activities	720		38		(34)	-
140 Administrative and support service activities	2,945		179		(123)	-
150 Public administration and defense, compulsory social security	-		-		-	-
160 Education	428		1		(3)	-
170 Human health services and social work activities	1,070		39		(31)	-
180 Arts, entertainment and recreation	279		7		(4)	-
190 Other services	862		36		(37)	-
200 Total	25,978		1,246		(874)	-

	a	b ¹	c	d ¹	e	f
		Gross carrying amount			Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
		Of which non-performing	Of which loans and advances subject to impairment			
	€m	€m	€m	€m	€m	€m
Dec-24						
010 Agriculture, forestry and fishing	1,788		53		(40)	-
020 Mining and quarrying	119		1		(2)	-
030 Manufacturing	4,242		218		(135)	-
040 Electricity, gas, steam and air conditioning supply	521		1		(15)	-
050 Water supply	97		-		(2)	-
060 Construction	349		13		(9)	-
070 Wholesale and retail trade	2,323		43		(43)	-
080 Transport and storage	844		71		(40)	-
090 Accommodation and food service activities	1,581		23		(22)	-
100 Information and communication	352		28		(20)	-
110 Financial and insurance activities	52				()	-
120 Real estate activities	7,883		311		(239)	-
130 Professional, scientific and technical activities	747		39		(30)	-
140 Administrative and support service activities	3,068		56		(66)	-
150 Public administration and defense, compulsory social security	-		-		-	-
160 Education	402				(8)	-
170 Human health services and social work activities	1,358		24		(27)	-
180 Arts, entertainment and recreation	336		13		(9)	-
190 Other services	876		13		(11)	-
200 Total	26,938		907		(719)	-

1 In line with the requirements for large institutions with an NPL ratio (in accordance with Regulation (EU) 2021/637) lower than 5%, columns "Of which non-performing" and "of which subject to impairment" are not required to be disclosed.

As per Article 453 point (f), Table 3.15 below includes all collateral, financial guarantees and credit derivatives used as credit risk mitigants for all secured exposures, irrespective of whether the standardised approach or the IRB approach is used for RWEA calculation. Any secured exposures by collateral or financial guarantees (eligible or not eligible as CRM techniques under Part Three, Title II, Chapter 4 of the CRD) have been disclosed.

Secured exposures are limited to those exposures against which eligible collateral which meets CRD definitions is held and has been used in the calculation of the Group's capital requirements. Haircuts are applied consistent with CRD requirements.

This table is not reflective of the total volume of exposures against which collateral and guarantees are actually held across the Group, nor does it reflect the full range of credit risk mitigation taken. A significant portion of the exposures included in Table 3.15 (exposures unsecured carrying amount) benefit from security taken to mitigate credit risk, but this security is not eligible for use in the regulatory capital calculations. For example, exposures in the Group's leasing business are included as unsecured exposures in the table, although the underlying assets financed are held to mitigate credit risk in this business.

The table excludes exposures where the Group nets derivative mark-to-market positions with certain interbank counterparties against cash collateral placed and received with those counterparties under credit support annex (CSA) agreements. For cash collateral held against derivative exposures refer to the counterparty credit risk section.

Debt securities are included in the relevant exposure classes in the table. Credit risk mitigation realised through the netting of on-balance sheet assets and liabilities is not reflected in the table. Certain customer loans and overdrafts are netted against deposits as permitted by the CRD subject to certain criteria including a legal right of offset. Effectiveness of netting techniques is achieved through the execution of industry standard legal agreements.

Collateral used to mitigate risk, both for mortgage and other lending is diversified. The main types of guarantors are corporates, individuals, financial institutions, sovereigns and multilateral development banks (MDBs). Their creditworthiness is assessed on a case- by-case basis.

Table 3.15 - EU CR3 – CRM techniques overview: Disclosure of the use of credit risk mitigation techniques

	Unsecured carrying amount	Secured - carrying amount			
			of which: secured by collateral	of which: secured by financial guarantees	of which: secured by credit derivatives
	a	b	c	d	e
	€m	€m	€m	€m	€m
Jun-25					
1 Loans and advances	48,954	62,668	61,738	930	437
2 Debt securities	15,916	-	-	-	-
3 Total	64,870	62,668	61,738	930	437
4 of which non-performing exposures	506	1,000	970	30	-
EU-5 of which defaulted	473	1,000			

	Unsecured carrying amount	Secured - carrying amount			
			of which: secured by collateral	of which: secured by financial guarantees	of which: secured by credit derivatives
	a	b	c	d	e
	€m	€m	€m	€m	€m
Dec-24					
1 Loans and advances	53,463	63,447	62,196	1,251	629
2 Debt securities	9,895	-	-	-	-
3 Total exposures	63,357	63,447	62,196	1,251	629
4 of which non-performing exposures	379	991	956	35	-
EU-5 of which defaulted	368	991			

The Group determines exposure values for counterparty credit risk on derivatives primarily using the Standardised Approach (SA-CCR). The Original Exposure Method is used for derivatives transacted by entities in the Davy Group. The Group determines exposure values for repurchase transactions using the Financial Collateral Comprehensive Method (FCCM) .

In determining the EAD for derivative credit exposure, the Group recognises the credit risk mitigating impact of cash collateral received under CSAs. EAD for particular netting sets is reduced by the amount of cash collateral held in accordance with the relevant specific regulatory rules. Separately, where the Group posts collateral under a CSA, the net negative mark-to-market on the related netting set is used to reduce the EAD on the collateral exposure, once again in accordance with the relevant specific regulatory rules.

As per Article 439, points (f), (g), (k) and (m), Table 4.1 below sets out the methods used to calculate CCR regulatory requirements excluding CCPs and the resultant RWEAs. Article 439(m) is an annual requirement on disclosure of the size of on and off balance sheet derivatives.

Table 4.1 - EU CCR1 - Analysis of CCR exposure by approach

	a	b	c	d	e	f	g	h
	Replacement cost (RC) €m	Potential future exposure (PFE) €m	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM €m	Exposure value post-CRM €m	Exposure value €m	RWEA
Jun-25								
EU-1 EU - Original Exposure Method (for derivatives)	-	-		1.4	-	-	-	-
EU-2 EU - Simplified SA-CCR (for derivatives)	-	-		1.4	-	-	-	-
1 SA-CCR (for derivatives)	284	487		1.4	1,936	1,079	1,076	589
2 IMM (for derivatives and SFTs)			-	-	-	-	-	-
2a of which securities financing transactions netting sets			-		-	-	-	-
2b of which derivatives and long settlement transactions netting sets			-		-	-	-	-
2c of which from contractual cross-product netting sets			-		-	-	-	-
3 Financial collateral simple method (for SFTs)					-	-	-	-
4 Financial collateral comprehensive method (for SFTs)					132	103	103	22
5 VaR for SFTs					-	-	-	-
6 Total					2,068	1,182	1,179	611

	a	b	c	d	e	f	g	h
	Replacement cost (RC) €m	Potential future exposure (PFE) €m	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM €m	Exposure value post-CRM €m	Exposure value €m	RWEA
Dec-24								
EU-1 EU - Original Exposure Method (for derivatives)	-	0		1.4	1	1	1	0
EU-2 EU - Simplified SA-CCR (for derivatives)	-	-		1.4	-	-	-	-
1 SA-CCR (for derivatives)	211	499		1.4	1,918	994	988	616
2 IMM (for derivatives and SFTs)			-	-	-	-	-	-
2a of which securities financing transactions netting sets			-		-	-	-	-
2b of which derivatives and long settlement transactions netting sets			-		-	-	-	-
2c of which from contractual cross-product netting sets			-		-	-	-	-
3 Financial collateral simple method (for SFTs)					-	-	-	-
4 Financial collateral comprehensive method (for SFTs)					130	123	123	46
5 VaR for SFTs					-	-	-	-
6 Total					2,048	1,117	1,111	662

As per Article 439 point (l), which refers to point (e) of Article 444, Table 4.2 below presents a breakdown of CCR by exposure class and risk weight.

Table 4.2 - EU CCR3 - Standardised approach – CCR exposures by regulatory exposure class and risk weights

Jun-25	a	b	c	d	e	f	g	h	i	j	k	l
Exposure classes	Risk Weight											
	0%	2%	4%	10%	20%	50%	70%	75%	100%	150%	Others	Total
1 Central governments or central banks	-	-	-	-	-	-	-	-	-	-	-	-
2 Regional government or local authorities	-	-	-	-	-	-	-	-	-	-	-	-
3 Public sector entities	-	-	-	-	-	-	-	-	-	-	-	-
4 Multilateral development banks	-	-	-	-	-	-	-	-	-	-	-	-
5 International organisations	-	-	-	-	-	-	-	-	-	-	-	-
6 Institutions	-	1	-	-	93	-	-	-	-	-	-	94
7 Corporates	-	-	-	-	-	-	-	-	90	-	-	90
8 Retail	-	-	-	-	-	-	-	-	0	-	-	0
9 Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-
10 Other items	-	-	-	-	-	-	-	-	-	-	-	-
11 Total exposure value	-	1	-	-	93	-	-	-	90	-	-	184

Dec-24	a	b	c	d	e	f	g	h	i	j	k	l
Exposure classes	Risk Weight											
	0%	2%	4%	10%	20%	50%	70%	75%	100%	150%	Others	Total
1 Central governments or central banks	-	-	-	-	-	-	-	-	-	-	-	-
2 Regional governments or local authorities	-	-	-	-	-	-	-	-	-	-	-	-
3 Public sector entities	-	-	-	-	-	-	-	-	-	-	-	-
4 Multilateral development banks	-	-	-	-	-	-	-	-	-	-	-	-
5 International organisations	-	-	-	-	-	-	-	-	-	-	-	-
6 Institutions	-	1	-	-	48	64	-	-	-	-	-	113
7 Corporates	-	-	-	-	-	-	-	-	80	-	-	80
8 Retail	-	-	-	-	-	-	-	-	-	-	-	-
9 Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-
10 Other items	-	-	-	-	-	-	-	-	-	-	-	-
11 Total exposure value	-	1	-	-	48	64	-	-	80	-	-	193

As per Article 439 point (I), which refers to point (g) of Article 452, Table 4.3 below presents a detailed view of counterparty credit risk positions subject to the IRB approach by exposure class and PD scale. The Group have no Advanced IRB CCR exposures.

Tale 4.3 - EU CCR4 - IRB approach - Credit risk exposures by exposure class and PD scale

	a	b	c	d	e	f	g
	Exposure Value €m	Exposure weighted average PD %	Number of obligors	Exposure weighted average LGD %	Exposure weighted average maturity (years)	RWEA €m	Density of risk weighted exposure amounts %
Jun-25							
PD Scale							
Total FIRB							
1 0.00 to <0.15	526	0.06%	54	44.26%	2.5	144	27.45%
2 0.15 to <0.25	78	0.21%	20	42.11%	2.5	38	48.48%
3 0.25 to <0.50	128	0.39%	53	41.49%	2.5	74	58.16%
4 0.50 to <0.75	45	0.57%	25	40.00%	2.5	29	65.24%
5 0.75 to <2.50	136	1.26%	74	40.00%	2.5	118	86.79%
6 2.50 to <10.00	45	3.93%	40	40.00%	2.5	53	118.03%
7 10.00 to <100.00	35	10.48%	9	40.00%	2.5	60	173.10%
8 100.00 (Default)	3	100.00%	6	40.00%	2.5	-	0.00%
Total foundation IRB	996	1.16%	281	42.62%	2.5	517	51.90%
Institutions							
1 0.00 to <0.15	447	0.06%	32	45.00%	2.5	122	27.33%
2 0.15 to <0.25	33	0.20%	2	45.00%	2.5	19	58.96%
3 0.25 to <0.50	19	0.36%	2	45.00%	2.5	11	56.45%
4 0.50 to <0.75	-	-	-	-	-	-	-
5 0.75 to <2.50	-	-	-	-	-	-	-
6 2.50 to <10.00	-	-	-	-	-	-	-
7 10.00 to <100.00	-	-	-	-	-	-	-
8 100.00 (Default)	-	-	-	-	-	-	-
Total institutions	499	0.08%	36	45.00%	2.5	152	30.54%
Corporates of which other							
1 0.00 to <0.15	79	0.11%	22	40.00%	2.5	22	28.10%
2 0.15 to <0.25	45	0.22%	18	40.00%	2.5	18	40.80%
3 0.25 to <0.50	109	0.39%	51	40.86%	2.5	63	58.46%
4 0.50 to <0.75	45	0.57%	25	40.00%	2.5	29	65.24%
5 0.75 to <2.50	136	1.26%	74	40.00%	2.5	118	86.79%
6 2.50 to <10.00	45	3.93%	40	40.00%	2.5	53	118.03%
7 10.00 to <100.00	35	10.48%	9	40.00%	2.5	60	173.10%
8 100.00 (Default)	3	100.00%	6	40.00%	2.5	-	0.00%
Total corporates of which other	497	2.28%	245	40.19%	2.5	364	73.38%

As per Article 439 point (e), Table 4.4 below provides a breakdown of all types of collateral posted or received to support or reduce CCR exposures related to derivative transactions and to SFTs, including transactions cleared through CCP.

Table 4.4 - EU CCR5 - Composition of collateral for CCR exposures

	a		b		c		d		e		f		g		h	
	Collateral used in derivative transactions								Collateral used in SFTS							
	Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral									
	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated
	€m	€m	€m	€m	€m	€m	€m	€m	€m	€m	€m	€m	€m	€m	€m	€m
Jun-25																
Collateral type																
1 Cash – domestic currency	401	81	0	91	-	-	-	-	-	-	-	-	-	-	-	-
2 Cash – other currencies	17	1	241	129	-	-	-	-	-	-	-	-	-	-	-	-
3 Domestic sovereign debt	-	-	-	-	-	19	-	-	-	-	-	-	-	-	10	-
4 Other sovereign debt	-	-	-	599	-	-	-	-	-	-	-	-	-	-	-	-
5 Government agency debt	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6 Corporate bonds	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 Equity securities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8 Other collateral	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Total	418	82	241	819	-	19	-	-	-	-	-	-	-	-	-	10

	a		b		c		d		e		f		g		h	
	Collateral used in derivative transactions								Collateral used in SFTS							
	Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral									
	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated
	€m	€m	€m	€m	€m	€m	€m	€m	€m	€m	€m	€m	€m	€m	€m	€m
Dec-24																
Collateral type																
1 Cash – domestic currency	88	61	12	168	-	-	-	-	-	-	-	-	-	-	-	-
2 Cash – other currencies	6	5	145	216	-	-	-	-	-	-	-	-	-	-	-	-
3 Domestic sovereign debt	-	-	-	-	-	6	-	-	-	-	-	-	-	-	-	-
4 Other sovereign debt	-	-	-	690	-	-	-	-	-	-	-	-	-	-	-	-
5 Government agency debt	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6 Corporate bonds	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 Equity securities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8 Other collateral	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Total	94	66	157	1,074	-	6	-	-	-	-	-	-	-	-	-	-

Previous

Index

Next

As per Article 439 point (j), Table 4.5 below sets out the Group's exposure to credit derivative transactions analysed between derivatives bought or sold.

Table 4.5 - EU CCR6 - Credit derivative exposures

	Jun-25		Dec-24	
	a	b	a	b
	Protection bought €m	Protection sold €m	Protection bought €m	Protection sold €m
Notionals	-	-	-	-
1 Single-name credit default swaps	-	-	-	-
2 Index credit default swaps	-	-	-	-
3 Total return swaps	-	-	-	-
4 Credit options	-	-	-	-
5 Other credit derivatives	-	-	-	-
6 Total notionals	-	-	-	-
Fair values				
7 <i>Positive fair value (asset)</i>	-	-	-	-
8 <i>Negative fair value (liability)</i>	-	-	-	-

As per Article 439 point (i), Table 4.6 below sets out the Group's exposure to Qualifying Central Counterparty (QCCP).

Table 4.6 - EU CCR8 - Exposures to CCPs

	Jun-25		Dec-24	
	a	b	a	b
	Exposure value €m	RWEA €m	Exposure value €m	RWEA €m
1 Exposure to QCCPs (total)		20		28
2 Exposures for trades at QCCPs (excluding initial margin and default fund contributions)	182	4	448	9
of which;				
3 (i) OTC derivatives	181	4	447	9
4 (ii) Exchange-traded derivatives	1	0	1	0
5 (iii) SFTs	-	-	-	-
6 (iv) Netting sets where cross-product netting has been approved	-	-	-	-
7 Segregated initial margin	-	-	-	-
8 Non-segregated initial margin	839	17	966	19
9 Prefunded default fund contributions	-	-	-	-
10 Unfunded default fund contributions	-	-	-	-
11 Exposure to non-QCCPs (total)		-		-
12 Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions);	-	-	-	-
of which;				
13 (i) OTC derivatives	-	-	-	-
14 (ii) Exchange-traded derivatives	-	-	-	-
15 (iii) SFTs	-	-	-	-
16 (iv) Netting sets where cross-product netting has been approved	-	-	-	-
17 Segregated initial margin	-	-	-	-
18 Non-segregated initial margin	-	-	-	-
19 Prefunded default fund contributions	-	-	-	-
20 Unfunded default fund contributions	-	-	-	-

Securitisation roles and strategy

The Group has acted as originator under a number of securitisation structures, both traditional and synthetic. The purpose of these securitisations is typically to diversify the sources of funding for the Group or to transfer credit risk. Information on the exposures securitised under these transactions, and which qualify for Pillar 1 derecognition, are provided in the tables in this Annex.

The Group has also purchased positions in securitisation transactions. These positions have been purchased in transactions where the individual notes were originally highly rated and benefited from strong credit enhancement provided by lower ranking notes. The purchased positions cover a broad range of asset classes including Commercial Mortgage-Backed Securities (CMBS), Residential Mortgage-Backed Securities (RMBS), Consumer loans and loans to Corporates/ SMEs.

The Group has not acted as a sponsor in any securitisation transactions.

Calculation of risk weighted exposure amounts

At 30 June 2025 the Group's securitisation positions were risk weighted in accordance with the hierarchy of approaches set out in Article 254 of the CRR.

For the Group's synthetic securitisations, the SEC-IRBA method was used to risk weight the securitisation positions with retained junior positions deducted fully from CET1. The Group has recognised significant credit risk transfer for these transactions pursuant to Article 245 (2) of the CRR.

The risk weighted exposure amounts for the Group's purchased positions are calculated using the SEC-ERBA approach. The Group's purchased positions are all held in the Banking Book. A supervisory deduction is taken from CET1 for purchased positions which otherwise would have attracted a 1250% risk.

As per Article 449 point (j), Table 5.1 below shows the Group as an originator and investor, non-trading book carrying amount of securitisation exposures broken down by type as at 30 June 2025.

Table 5.1 - EU-SEC1 - Securitisation exposures in the non-trading book

		a	b	c	d	e	f	g	h		i	j	k	l		m	n	o
		Institution acts as originator						Sub-total	Institution acts as sponsor				Sub-total	Institution acts as investor				Sub-total
		Traditional			Synthetic				Traditional		Synthetic	Traditional			Synthetic			
		STS	Non-STS						STS	Non-STS								
			of which SRT		of which SRT													
Jun-25																		
1	Total exposures	-	-	17	17	3,667	3,667	3,684	-	-	-	-	-	421	205	-	-	626
2	Retail (total)	-	-	17	17	643	643	660	-	-	-	-	-	421	186	-	-	607
of which:																		
3	residential mortgage	-	-	17	17	643	643	660	-	-	-	-	-	421	186	-	-	607
4	credit card	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	other retail exposures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Wholesale (total)	-	-	-	-	3,024	3,024	3,024	-	-	-	-	-	-	19	-	-	19
of which:																		
8	loans to corporates	-	-	-	-	3,024	3,024	3,024	-	-	-	-	-	-	-	-	-	-
9	commercial mortgage	-	-	-	-	-	-	-	-	-	-	-	-	-	19	-	-	19
10	lease and receivables	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	other wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

		a	b	c	d	e	f	g	h		i	j	k	l		m	n	o
		Institution acts as originator						Sub-total	Institution acts as sponsor				Sub-total	Institution acts as investor				Sub-total
		Traditional			Synthetic				Traditional		Synthetic	Traditional			Synthetic			
		STS	Non-STS						STS	Non-STS								
			of which SRT		of which SRT													
Dec-24																		
1	Total exposures	-	-	20	20	4,626	4,626	4,646	-	-	-	-	-	900	138	-	-	1,038
2	Retail (total)	-	-	20	20	688	688	708	-	-	-	-	-	900	115	-	-	1,015
of which:																		
3	residential mortgage	-	-	20	20	688	688	708	-	-	-	-	-	900	115	-	-	1,015
4	credit card	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	other retail exposures	-	-	-	-	-	-	-	-	-	-	-	-	-	0	-	-	0
6	re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Wholesale (total)	-	-	-	-	3,938	3,938	3,938	-	-	-	-	-	-	22	-	-	22
of which:																		
8	loans to corporates	-	-	-	-	3,938	3,938	3,938	-	-	-	-	-	-	-	-	-	-
9	commercial mortgage	-	-	-	-	-	-	-	-	-	-	-	-	-	22	-	-	22
10	lease and receivables	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	other wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

As per Article 449 point (k)(i) Table 5.2 below shows the aggregate amount of securitisation positions where institutions act as originator or sponsor and the associated risk-weighted assets and capital requirements by regulatory approaches, including exposures deducted from own funds or risk weighted at 1250%, broken down between traditional and synthetic securitisations and between securitisation and re securitisation exposures, separately for STS and non-STS positions, and further broken down into a meaningful number of risk-weight or capital requirement bands and by approach used to calculate the capital requirements.

Table 5.2 - EU-SEC3 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as originator or as sponsor

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	EU-p	EU-q
		Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)				RWEA (by regulatory approach)				Capital charge after cap			
		≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions
Jun-25	1	Total exposures	2,614	-	1,052	-	17	3,667	-	-	17	1,124	-	-	90	-	-	-
	2	Traditional transactions	-	-	-	-	17	-	-	-	17	-	-	-	-	-	-	-
	3	Securitisation	-	-	-	-	17	-	-	-	17	-	-	-	-	-	-	-
	4	Retail	-	-	-	-	17	-	-	-	17	-	-	-	-	-	-	-
	5	Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	6	Wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	7	Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	8	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	9	Synthetic transactions	2,614	-	1,052	-	-	3,667	-	-	-	1,124	-	-	90	-	-	-
	10	Securitisation	2,614	-	1,052	-	-	3,667	-	-	-	1,124	-	-	90	-	-	-
	11	Retail underlying	643	-	-	-	-	643	-	-	-	110	-	-	9	-	-	-
	12	Wholesale	1,971	-	1,052	-	-	3,024	-	-	-	1,014	-	-	81	-	-	-
	13	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	EU-p	EU-q
		Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)				RWEA (by regulatory approach)				Capital charge after cap			
		≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions
Dec-24	1	Total exposures	2,129	1,140	1,357	-	21	4,625	-	-	21	1,707	-	-	137	-	-	-
	2	Traditional transactions	-	-	-	-	20	-	-	-	20	-	-	-	-	-	-	-
	3	Securitisation	-	-	-	-	20	-	-	-	20	-	-	-	-	-	-	-
	4	Retail	-	-	-	-	20	-	-	-	20	-	-	-	-	-	-	-
	5	Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	6	Wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	7	Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	8	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	9	Synthetic transactions	2,129	1,140	1,357	-	1	4,625	-	-	1	1,707	-	-	137	-	-	-
	10	Securitisation	2,129	1,140	1,357	-	1	4,625	-	-	1	1,707	-	-	137	-	-	-
	11	Retail underlying	688	-	-	-	-	687	-	-	-	127	-	-	10	-	-	-
	12	Wholesale	1,440	1,140	1,357	-	1	3,938	-	-	1	1,580	-	-	126	-	-	-
	13	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

As per Article 449 point (k)(ii) Table 5.3 below shows the non-trading book aggregate amount of securitisation positions, where the Group act as investor and the associated risk weighted assets and capital requirements by regulatory approaches as at 30 June 2025.

Table 5.3 - EU-SEC4 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as investor

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	EU-p	EU-q
		Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)				RWEA (by regulatory approach)				Capital charge after cap			
		≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions
Jun-25																		
1	Total exposures	596	11	-	19	-	-	626	-	-	-	129	-	-	-	10	-	-
	Traditional																	
2	securitisation	596	11	-	19	-	-	626	-	-	-	129	-	-	-	10	-	-
3	Securitisation	596	11	-	19	-	-	626	-	-	-	129	-	-	-	10	-	-
4	Retail underlying	596	11	-	0	-	-	607	-	-	-	83	-	-	-	7	-	-
5	Of which STS	421	-	-	-	-	-	421	-	-	-	42	-	-	-	3	-	-
6	Wholesale	-	-	-	19	-	-	19	-	-	-	46	-	-	-	4	-	-
7	Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Synthetic securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Retail underlying	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	EU-p	EU-q
		Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)				RWEA (by regulatory approach)				Capital charge after cap			
		≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions
Dec-24																		
1	Total exposures	900	115	0	23	-	-	1,038	-	-	-	172	-	-	-	14	-	-
	Traditional																	
2	securitisation	900	115	0	23	-	-	1,038	-	-	-	172	-	-	-	14	-	-
3	Securitisation	900	115	0	23	-	-	1,038	-	-	-	172	-	-	-	14	-	-
4	Retail underlying	900	115	0	0	-	-	1,015	-	-	-	118	-	-	-	9	-	-
5	Of which STS	900	-	-	-	-	-	900	-	-	-	90	-	-	-	7	-	-
6	Wholesale	-	-	-	22	-	-	22	-	-	-	54	-	-	-	4	-	-
7	Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Synthetic securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Retail underlying	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

As per Article 449 point (I), Table 5.4 below shows for exposures securitised by the Group, the amount of exposures in default and the amount of the specific credit risk adjustments made by the Group during the current period, both broken down by exposure type. The amounts below include €14.9bn relating to securitisations where significant risk transfer was not recognised. These securitisations are used for liquidity purposes.

Table 5.4 – EU-SEC5 - Exposures securitised by the institution - Exposures in default and specific credit risk adjustments

	a		b		c	
	Exposures securitised by the institution - Institution acts as originator or as sponsor		Total outstanding nominal amount		Total amount of specific credit risk adjustments made during the period	
			Of which exposures in default			
Jun-25		€m		€m		€m
1	Total exposures	19,583		660		(6)
2	Retail (total)	16,045		390		1
3	residential mortgage	16,045		390		1
4	credit card	-		-		-
5	other retail exposures	-		-		-
6	re-securitisation	-		-		-
7	Wholesale (total)	3,538		271		(7)
8	loans to corporates	3,538		271		(7)
9	commercial mortgage	-		-		-
10	lease and receivables	-		-		-
11	other wholesale	-		-		-
12	re-securitisation	-		-		-

	a		b		c	
	Exposures securitised by the institution - Institution acts as originator or as sponsor		Total outstanding nominal amount		Total amount of specific credit risk adjustments made during the period	
			of which: exposures in default			
Dec-24		€m		€m		€m
1	Total exposures	20,129		622		67
2	Retail (total)	15,022		441		25
3	residential mortgages	15,022		441		25
4	credit card	-		-		-
5	other retail exposures	-		-		-
6	re-securitisation	-		-		-
7	Wholesale (total)	5,108		181		42
8	loans to corporates	5,108		181		42
9	commercial mortgages	-		-		-
10	lease and receivables	-		-		-
11	other wholesale	-		-		-
12	re-securitisation	-		-		-

As per Article 445 Disclosure of exposure to market risk, Table 6.1 shows the own funds requirements for market risk. The Group uses the simplified standardised approach for its assessment of Pillar 1 capital requirements for trading book market risk, using the prescribed regulatory calculation method. Own fund requirements for market risk arise predominantly from interest rate risk on the trading book and foreign exchange risk.

Table 6.1 -EU MR1 - Market risk under the standardised approach

	Jun-25	Dec-24
	^a	
	RWEAs	RWEAs
	€m	€m
Outright products		
1 Interest rate risk (general and specific)	117	194
2 Equity risk (general and specific)	11	10
3 Foreign exchange risk	155	142
4 Commodity risk	-	-
Options		
5 Simplified approach	-	-
6 Delta-plus method	-	-
7 Scenario approach	-	-
8 Securitisation (specific risk)	-	-
9 Total	283	346

The Economic Value of Equity (EVE) measures the changes in the net present value of interest rate sensitive instruments over their remaining life.

The Net Interest Income measures the impact of interest earnings due to shifts in the interest rate environment. The following table shows the estimated sensitivity of the Group’s net interest income (before tax) to an instantaneous and sustained 2-2.5% parallel movement in interest rates. The sensitivity assumes (i) an instantaneous and parallel movement in all interest rates, with a starting point of an ECB deposit rate of 2%; (ii) a static balance sheet; (iii) assets and liabilities whose pricing is mechanically linked to market or central bank policy rates reprice immediately; (iv) certain other assumptions including pass throughs to assets and liabilities. The sensitivities should not be considered a forecast of future performance in rate scenarios as they do not capture potential management action in response to unexpected changes in the interest rate environment. Net interest income sensitivities will change depending on interest rate starting point.

In the EVE metrics the equity is excluded from the cash flows as it is treated as an overnight maturing item. EVE and NII sensitivity is calculated under the regulatory EBA prescribed scenarios and uses standard key modelling and parametric assumptions set by regulatory guidelines. Table 7.1 below outlines the changes in the economic value of equity and net interest income in the period.

Table 7.1 - EU IRRBB1 - Interest rate risks of non-trading book activities

Supervisory shock scenarios	a	b	c	d
	Changes of the Economic Value of Equity		Changes of the Net Interest Income	
	Jun-25	Dec-24	Jun-25	Dec-24
	€m	€m	€m	€m
1 Parallel up	(700)	(495)	525	510
2 Parallel down	395	270	(555)	(575)
3 Steepener	(20)	5		
4 Flatteners	(100)	(110)		
5 Short rates up	(315)	(260)		
6 Short rates down	165	126		

As per Article 451a(2), Table 8.1 below provides qualitative information on the LCR ratio.

Table 8.1 - EU LIQB - Qualitative information on LCR Disclosures.

The Group is principally funded via granular retail customer deposits which are the primary driver of movements in the LCR over the period. Customer Deposits are originated in the Group's core franchises in ROI and UK with the top 20 deposits representing c.3% of the Group's deposit base.

The Group expects to remain a substantially deposit funded institution with loan portfolios principally funded by granular retail customer deposits and modest term wholesale funding issuance primarily to meet the Group's MREL requirements.

The Group maintains a strong LCR ratio derived from deposit funding.

The Group's liquidity buffer is comprised primarily of unencumbered High Quality Level 1 Liquid Assets.

The Group has modest net derivative exposures which primarily relate to the hedging of its own interest rate & currency risk. The outflows related to derivative and other collateral requirements are primary potential outflows under the adverse market scenario included in LCR per Article 423(3) of Regulation (EU) No 575/2013.

The Group manages its liquidity by jurisdiction with separate liquidity centres for each:

- GovCo is the Group's principal operating entity and one of the Group's two liquidity centres incorporating BOIMB and all subsidiaries except BOI UK.
- BOI UK is the Group's UK regulated subsidiary and the second liquidity centre. As such, it is separately managed from a liquidity perspective though there are intragroup flows between the two entities with GovCo providing unsecured wholesale funding to BOI UK.

From an LCR perspective, the Group holds GBP denominated liquid assets sufficient to meet GBP denominated outflows.

Table 8.2 - EU LIQ1 - LCR disclosures

The Group calculates additional liquidity outflows corresponding to collateral needs resulting from the impact of an adverse market scenario on the Group's derivative transactions using the Historical Look Back Approach (HLBA) as guided by the EBA. In preparing the LCR, the Group recognises restrictions on the transferability of liquidity between jurisdictions with surplus liquid assets in one jurisdiction not transferable to another jurisdiction.

1 The Liquidity Coverage Ratio (LCR) and cash outflows for 31 December 2024 have been restated following a refinement of the calculation of certain outflows. As a result, the Average LCR ratio decreased by 0.57% from 200.64% to 200.07%.

As per Article 451a(3), Table 8.3 below sets out the NSFR ratio detail of the Group.

Table 8.3 - EU LIQ2 - Net Stable Funding Ratio

Jun-25

Available stable funding (ASF) Items

- 1 Capital items and instruments
- 2 Own funds
- 3 Other capital instruments
- 4 *Retail deposits*
- 5 Stable deposits
- 6 *Less stable deposits*
- 7 *Wholesale funding:*
- 8 *Operational deposits*
- 9 Other wholesale funding
- 10 Interdependent liabilities
- 11 Other liabilities:
- 12 *NSFR derivative liabilities*
- 13

All other liabilities and capital instruments not included in the above categories

14 Total available stable funding (ASF)

Required stable funding (RSF) Items

15 Total high-quality liquid assets (HQLA)

EU-15a Assets encumbered for a residual maturity of one year or more in a cover pool

16 Deposits held at other financial institutions for operational purposes

17 Performing loans and securities:

Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut

Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions

Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:

With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk

Performing residential mortgages, of which:
With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk

Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products

25 Interdependent assets

26 Other assets:

Physical traded commodities
Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs

29 NSFR derivative assets

30 NSFR derivative liabilities before deduction of variation margin posted

31 All other assets not included in the above categories

32 Off-balance sheet items

33 Total RSF

34 Net Stable Funding Ratio (%)

a	b	c	d	e
Unweighted value by residual maturity				Weighted value
No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
€m	€m	€m	€m	€m
12,770	300	490	1,367	14,382
12,770	300	490	1,367	14,382
	-	-	-	-
	72,434	1,491	1,968	70,690
	42,868	931	1,136	42,745
	29,566	560	832	27,945
	31,269	1,120	7,007	20,185
	5,297	-	-	2,648
	25,972	1,120	7,007	17,537
	-	-	-	-
-	3,171	-	327	327
-				
	3,171	-	327	327
				105,585

				857
	7	8	401	354
	-	-	-	-
	3,670	4,952	73,006	57,515
	110	-	-	-
	177	37	302	339
	2,457	3,715	24,338	23,773
	-	-	-	-
	864	996	47,488	32,510
	847	976	46,534	31,674
	62	204	878	893
	-	-	-	-
-	2,156	-	6,452	7,972
				-
	-	-	-	503
	145			145
	295			15
	1,716	-	6,452	7,310
	19,335	-	-	1,772
				68,470
				154.21%

Dec-24

Available stable funding (ASF) Items

- 1 Capital items and instruments
- 2 Own funds
- 3 *Other capital instruments*
- 4 *Retail deposits*
- 5 Stable deposits
- 6 *Less stable deposits*
- 7 *Wholesale funding:*
- 8 *Operational deposits*
- 9 Other wholesale funding
- 10 Interdependent liabilities
- 11 Other liabilities:
- 12 *NSFR derivative liabilities*
- 13 *All other liabilities and capital instruments not included in the above categories*
- 14 Total available stable funding (ASF)

Required stable funding (RSF) Items

15 Total high-quality liquid assets (HQLA)

EU-15a Assets encumbered for a residual maturity of one year or more in a cover pool

16 Deposits held at other financial institutions for operational purposes

17 Performing loans and securities:

Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut

Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions

Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:

With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk

Performing residential mortgages, of which:
With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk

Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products

25 Interdependent assets

26 Other assets:

Physical traded commodities
Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs

29 NSFR derivative assets

30 NSFR derivative liabilities before deduction of variation margin posted

31 All other assets not included in the above categories

32 Off-balance sheet items

33 Total RSF

34 Net Stable Funding Ratio (%)

a	b	c	d	e
Unweighted value by residual maturity				Weighted value
No maturity	< 6 months	6 months to < 1yr	>= 1 yr	
€m	€m	€m	€m	€m
12,546	169	300	1,853	14,549
12,546	169	300	1,853	14,549
	-	-	-	-
	70,558	1,728	2,031	69,254
	42,347	971	1,069	42,222
	28,211	757	962	27,033
	31,637	1,436	7,342	20,603
	5,637	-	-	2,818
	26,001	1,436	7,342	17,784
	-	-	-	-
0	2,862	-	349	349
0				
	2,862	-	349	349
				104,755
				499
	15	17	795	703
	-	-	-	-
	3,783	5,086	72,634	57,299
	6	-	-	-
	304	123	473	565
	2,522	3,925	24,512	24,059
	-	-	-	-
	875	976	46,695	31,774
	854	953	45,572	30,792
	76	61	954	901
	-	-	-	-
-	1,653	-	6,678	7,828
				-
	-	-	-	578
	-			-
	565			28
	1,088	-	6,678	7,222
	18,538	-	17	1,263
				67,592
				154.98%

Table EU LRA - Disclosure of LR qualitative information

The leverage ratio measures the level of Tier 1 capital against both on and off balance sheet exposures. As at 30 June 2025, the leverage ratio was 6.72% on a regulatory basis (31 December 2024: 6.66%).

The purpose of monitoring and managing this metric is to enable Regulators to constrain the build-up of excessive leverage, which was considered to be one of the drivers of the banking crisis.

Tables 9.1, 9.2 and 9.3 illustrate the leverage ratio calculated in accordance with Articles 429 and 499 of the CRR and a breakdown of the Group’s leverage ratio exposure as at 30 June 2024 on a regulatory basis.

The European Commission has introduced a binding leverage requirement of 3%. The Group expects to remain well in excess of this requirement.

As per Article 451(1) point (b), Table 9.1 below provides a reconciliation of the total assets in the Group's published financial statements under IFRS and the total leverage exposure on a regulatory basis.

Table 9.1 - EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio exposures

	Jun-25	Dec-24
	a	a
	Applicable amount	Applicable amount
	€m	€m
1 Total assets as per published financial statements	162,376	161,813
2 Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	(25,110)	(25,515)
3 (Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	-	-
4 (Adjustment for temporary exemption of exposures to central banks (if applicable))	-	-
5 (Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the total exposure measure in accordance with point (i) of Article 429a(1) CRR)	-	-
6 Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	-	-
7 Adjustment for eligible cash pooling transactions	-	-
8 Adjustment for derivative financial instruments	(2,017)	(1,969)
9 Adjustment for securities financing transactions (SFTs)	1	1
10 Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	7,998	5,358
11 (Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	-	-
EU-11a (Adjustment for exposures excluded from the total exposure measure in accordance with point (c) and point (ca) of Article 429a(1) CRR)	-	-
EU-11b (Adjustment for exposures excluded from the total exposure measure in accordance with point (j) of Article 429a(1) CRR)	-	-
12 Other adjustments	(2,291)	(2,675)
13 Total exposure measure	140,957	137,013

[Previous](#)
[Index](#)
[Next](#)

Leverage ratio exposures**Bank of Ireland Group plc**

As per Article 451(1), points (a) and (b) and Article 451(3) (taking into account, where applicable, point (c) of Article 451(1) and Article 451(2) CRR), Table 9.2 below provides a detailed breakdown of the components of the LR denominator, as well as information on the actual LR, minimum requirements and buffers. This information is on a regulatory basis.

Table 9.2 - EU LR2 - LRCom: Leverage ratio common disclosure

	CRR leverage ratio exposures	CRR leverage ratio exposures
	a	b
	Jun-25	Dec-24
	€m	€m
On-balance sheet exposures (excluding derivatives and SFTs)		
1 On-balance sheet items (excluding derivatives, SFTs but including collateral)	134,238	133,070
2 Gross-up for derivatives collateral provided, where deducted from the balance sheet assets pursuant to the applicable accounting framework	-	-
3 (Deductions of receivables assets for cash variation margin provided in derivatives transactions)	(239)	(442)
4 (Adjustment for securities received under securities financing transactions that are recognised as an asset)	-	-
5 (General credit risk adjustments to on-balance sheet items)	-	-
6 (Asset amounts deducted in determining Tier 1 capital)	(2,469)	(2,605)
7 Total on-balance sheet exposures (excluding derivatives and SFTs)	131,530	130,024
Derivative exposures		
8 Replacement cost associated with SA-CCR derivatives transactions (ie net of eligible cash variation margin)	398	561
EU-8a Derogation for derivatives: replacement costs contribution under the simplified standardised approach	-	-
9 Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	902	950
EU-9a Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach	-	-
EU-9b Exposure determined under Original Exposure Method	1	1
10 (Exempted CCP leg of client-cleared trade exposures) (SA-CCR)	-	-
EU-10a (Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)	-	-
EU-10b (Exempted CCP leg of client-cleared trade exposures) (Original Exposure Method)	-	-
11 Adjusted effective notional amount of written credit derivatives	-	-
12 (Adjusted effective notional offsets and add-on deductions for written credit derivatives)	-	-
13 Total derivatives exposures	1,301	1,512
Securities financing transaction exposures		
14 Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions	127	119
15 (Netted amounts of cash payables and cash receivables of gross SFT assets)	-	-
16 Counterparty credit risk exposure for SFT assets	1	1
EU-16a Derogation for SFTs: Counterparty credit risk exposure in accordance with Articles 429e(5) and 222 CRR	-	-
17 Agent transaction exposures	-	-
EU-17a (Exempted CCP leg of client-cleared SFT exposure)	-	-
18 Total securities financing transaction exposures	128	119
Other off-balance sheet exposures		
19 Off-balance sheet exposures at gross notional amount	19,531	18,639
20 (Adjustments for conversion to credit equivalent amounts)	(11,533)	(13,281)
21 (General provisions deducted in determining Tier 1 capital and specific provisions associated associated with off-balance sheet exposures)	-	-
22 Off-balance sheet exposures	7,998	5,358
Excluded exposures		
EU-22a (Exposures excluded from the leverage ratio total exposure measure in accordance with point (c) and point (ca) of Article 429a(1) CRR)	-	-
EU-22b (Exposures exempted in accordance with point (j) of Article 429a(1) CRR (on and off balance sheet))	-	-
EU-22c (Excluded exposures of public development banks (or units) - Public sector investments)	-	-
EU-22d (Excluded exposures of public development banks (or units) - Promotional loans)	-	-
EU-22e (Excluded passing-through promotional loan exposures by non-public development banks (or units))	-	-
EU-22f (Excluded guaranteed parts of exposures arising from export credits)	-	-
EU-22g (Excluded excess collateral deposited at triparty agents)	-	-
EU-22h (Excluded CSD related services of CSD/institutions in accordance with point (o) of Article 429a(1) CRR)	-	-
EU-22i (Excluded CSD related services of designated institutions in accordance with point (p) of Article 429a(1) CRR)	-	-
EU-22j (Reduction of the exposure value of pre-financing or intermediate loans)	-	-
EU-22k (Excluded exposures to shareholders according to Article 429a (1), point (da) CRR)	-	-
EU-22l (Exposures deducted in accordance with point (q) of Article 429a(1) CRR)	-	-
EU-22m (Total exempted exposures)	-	-
Capital and total exposures		
23 Tier 1 capital	9,469	9,124
24 Total exposure measure	140,957	137,013
Leverage ratio		
25 Leverage ratio	6.72%	6.66%
EU-25 Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	6.72%	6.66%
25a Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) (%)	6.72%	6.66%
26 Regulatory minimum leverage ratio requirement (%)	3.00%	3.00%
EU-26a Additional own funds requirements to address the risk of excessive leverage (%)	-	-
EU-26b of which: to be made up of CET1 capital	-	-
27 Leverage ratio buffer requirement (%)	-	-
EU-27a Overall leverage ratio requirement (%)	3.00%	3.00%
Choice on transitional arrangements and relevant exposures		
EU-27b Choice on transitional arrangements for the definition of the capital measure	Transitional	Transitional

As per Article 451(1) point (b), Table 9.3 below analyses the calculation of the leverage ratio exposures on a regulatory basis.

Table 9.3 - EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)

		Jun-25	Dec-24
		a	a
		CRR leverage ratio exposures	CRR leverage ratio exposures
		€m	€m
EU-1	Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	133,999	132,628
EU-2	Trading book exposures	139	176
EU-3	Banking book exposures, of which:	133,861	132,452
EU-4	Covered bonds	3,939	2,792
EU-5	Exposures treated as sovereigns	39,435	39,387
EU-6	Exposures to regional governments, MDB, international organisations and PSE, not treated as sovereigns	-	-
EU-7	Institutions	876	937
EU-8	Secured by mortgages of immovable properties	49,983	48,468
EU-9	Retail exposures	7,324	7,038
EU-10	Corporates	18,413	19,650
EU-11	Exposures in default	1,187	1,098
EU-12	Other exposures (eg equity, securitisations, and other non-credit obligation assets)	12,704	13,081

As per Article 449a CRR, the following tabs cover the qualitative and quantitative information associated with Environmental, Social and Governance risks (ESG risks).

Previous

Index

Next

Table 1 - Qualitative information on Environmental risk in accordance with Article 449a CRR

Row number	Business strategy and processes
	<p>Institution’s business strategy to integrate environmental factors and risks, taking into account the impact of environmental factors and risks on institution’s business environment, business model, strategy and financial planning</p> <p>Sustainability a core strategic pillar</p> <p>Sustainability is embedded as one of Bank of Ireland Group's three core strategic pillars under 'Sustainable Company'. Sitting below the Group's Sustainable Company pillar is its 'Investing in Tomorrow' Sustainability Strategy. This is focused on the Group's material Environmental, Social and Governance (ESG) impacts and opportunities aligning to science and best practice including the UN Sustainable Development Goals (SDGs), the blueprint for a more sustainable future for all. The Group continues to turn sustainability ambitions into action, delivering practical sustainability solutions that make a difference for customers. The Group's Sustainability Strategy has three core pillars: Supporting the Green Transition, Enhancing Financial Wellbeing and Enabling Our Colleagues to Thrive, supported by a number of foundational topics.</p> <p>Strategy</p> <p>The Group continues to make progress in achieving its objectives under its Sustainability Strategy through the application of its Climate Transition Plan for the 'Supporting the Green Transition' strategic pillar. Since launching this strategy, the Group has made significant progress on supporting the move towards a net zero economy. In 2022, the Group became the first Irish bank to have its Science Based Targets (SBTs) on GHG emission reduction validated by the Science-Based Targets Initiative (SBTi), covering all the Group's operations and 71% of its FY20 baseline loan book.</p> <p>As of FY2024 the Group is on track to meet its 2030 SBTs across Republic of Ireland (RoI) mortgages, commercial real estate, electricity generation project finance and its own operations. In addition, the Group reached its 2025 target for 25% of its Corporate lending customer base having their own SBTs.</p> <p>The Group has already achieved its related Sustainable Finance loan target for customers of c.€15 billion by 2025 and is well placed to achieve its target of c.€30 billion by 2030</p> <p>For further details on the Group’s Climate Transition Plan, please refer to pages 41-47 of the Group's 2024 Annual Report</p> <p>Materiality Assessments</p> <p>The Group conducts ongoing assessments of climate and other environmental impacts on at least an annual basis in the form of:</p> <p>(a) a climate and other environmental (C&E) risk materiality assessment as part the Internal Capital Adequacy Assessment Process (ICAAP); and</p> <p>(b) a Double Materiality Assessment exercise under the Corporate Sustainability Reporting Directive (CSRD), which is informed by the C&E risk materiality assessment.</p> <p>These assessments inform its business plans and strategic approach to sustainable finance, product development, customer engagement and risk management. The 2022 output of these assessments was factored into the Group Strategy refresh to 2025 announced in March 2023. In 2022, the Group set decarbonisation SBTs, validated by the SBTi, that cover 71% of its lending portfolio, and has reported its progress against these targets since FY2023. In line with its decarbonisation ambitions, in 2023 the Group set targets for sustainable financing: c.€15 billion by 2025 and c.€30 billion by 2030. For further details on progress towards these targets, please see the Group's answer to (b) below.</p> <p>The Group recognises the global economic dependency on nature and ecosystem services and its role in mitigating environmental impacts and supporting a transition to a net zero and regenerative economy. One of the main causes of environmental impacts is climate change, which is being addressed through the Group's Climate Transition plan and its targets. Through the Sustainability Strategy the Group aims to address the other drivers of environmental impacts (which are categorised as pollution, water stress, resource scarcity, biodiversity loss) and the transitional impacts towards more environmentally sustainable economic activities.</p> <p>For ICAAP 2025 an enhanced risk materiality assessment and quantification of environmental risk impacts was completed. This enhancement saw other environmental (non-climate) risk drivers assessed at the sub-risk level (such as pollution, water stress and biodiversity loss) across each principal risk with a potential risk impact quantified across a short, medium and long-term time horizon.</p> <p>While it is not assessed as a material issue for the Group at this point in time, mitigation of other environmental risk is integrated into customer engagement strategies, sectoral strategies and lending procedures as part of the overall Sustainability Strategy, in line with the UNPRB and ECB Guide on Climate-related Environmental Risks.</p> <p>These materiality assessment refreshes will continue to inform the Group’s strategic direction and ensure that its Sustainability Strategy continues to align with the views and needs of its stakeholders.</p> <p>The management of Climate and Other Environmental Risks in Bank of Ireland</p> <p>The Group defines ESG risk as the risk to the Group that ESG factors (environmental, social or governance matters) could cause a material negative impact on:</p> <ul style="list-style-type: none">• the Group’s earnings, capital, franchise value, or reputation;• the Group's regulatory standing;• the long-term sustainability of its customer's operations and financial wellbeing; and• the communities and environment in which the Group and its customers operate. <p>Climate and Other Environmental risk is defined in the Group as the risk to the Group of any material negative impact from current or prospective impacts of environmental factors arising from:</p> <p>i) the transition to a low-carbon and more environmentally sustainable economy; and</p> <p>ii) climate-related physical events which could lead to:</p> <p>a) higher business costs, lower revenues, stranded assets and potential financial implications from physical phenomena; and</p> <p>The Group defines two key sub-categories of environmental risks that impact its business (in line with the ECB Guide on Climate-related and Environmental risks November 2020). These are the risks associated with the transition to a low carbon economy and from climate-related physical events. In defining these sub-categories, the Group has drawn on the recommendations of the Taskforce on Climate-related Financial Disclosures (TCFD) and the Taskforce on Nature-related Financial Disclosures (TNFD).</p> <p>The Group’s risk management framework sets out the risk management, measurement, and reporting requirements for the Group's risks. The Group ESG risk management framework sets out the Group's approach to ESG risk management.</p> <p>ESG factors represent a common driver across the Group’s principal and sub risk types. The Group applies a risk lens to ensure that the impact of ESG across the Group's risk types is considered on an ongoing basis and that the aggregate impact arising from ESG risk drivers is given appropriate consideration. While ESG risk management is managed through the Group's principal and sub risk types, the Group also has dedicated resources to lead the co-ordination of the Group's approach to ESG risk management, both in first line of defence (1LOD) (Sustainability Team, Group Strategy) and in second line of defence (2LOD) (Business, Strategic and ESG Risk Team, Group Risk).</p> <p>Identification and assessment of Climate and Other Environmental Risks</p> <p>Guided by the Group’s ESG risk management framework, the Group has embedded climate and other environmental risk management into its key risk processes. The Group continues to improve how it assesses climate and other environmental risk drivers taking into account potential impacts, its mitigating actions, and next steps for each risk type.</p> <p>In the Group's key ICAAP planning process, the potential impact of climate risk drivers is assessed for each key risk type over the short (< 3 years), medium (3-5 years) and long-term (> 5 years). An annual quantitative assessment for these risks was established in 2022 and is embedded into the Group's ICAAP. For climate-related risk impacts this assessment is disclosed in pages 50-51 of the Group's 2024 Annual Report and can be summarised as follows:</p> <ul style="list-style-type: none">• Credit risk: Increased costs associated with physical and transition risks may impact financial soundness of households and businesses reducing their ability to service debt and impairing asset values, resulting in financial loss to the Group through higher probability of default and higher losses given default.• Business and Strategic risk: Long-term franchise impacts if strategic commitments are not achieved by the Group, and the Group's product offering does not adapt to changing market dynamics.• Operational risk: Physical risks could impact continuity of the Group's operations or operations of its material suppliers, resulting in sustained disruption of the supply chain and ultimately its ability to service customers.• Conduct risk: Potential impact if failures in product design, market practice or customer engagement lead to greenwashing claims or poor customer outcomes. <p>In 2024 the risk materiality assessment, which feeds into the Group's ICAAP, was enhanced such that other environmental (non-climate) risk drivers were quantitatively assessed across each principal risk across a short, medium and long-term time horizon. While it is not assessed as a material risk driver for the Group, at this point in time, mitigation of other environmental risk is integrated into customer engagement strategies, sectoral strategies and lending procedures as part of the overall Sustainability Strategy.</p> <p>Financial Planning and the Internal Capital Adequacy Assessment Process (ICAAP)</p> <p>Climate and other environmental risk considerations are being embedded in key processes where investment decisions and associated climate risks are material. The setting of decarbonisation SBTs and Sustainable Finance targets across key lending portfolios is ensuring that the Group's lending portfolios are aligned with the Paris agreement and through this alignment, mitigating and reducing transition risk over the period to 2030.</p> <p>The ICAAP is a key planning process for the Group and facilitates the Board and senior management in identifying, measuring and monitoring the Group's risks and ensures that the Group holds adequate capital to support its risk profile. Given the long time horizon associated with climate change, scenario analysis is considered a key tool to inform strategic direction and risk management.</p> <p>The Group has integrated climate into the ICAAP and its broader scenario analysis framework to assess the impacts of climate across all the principal risk types (e.g. credit, business, operational, conduct and regulatory). This scenario analysis informs climate risk materiality assessments to quantify the potential impacts that is integrated into the Group's ICAAP. This materiality assessment also informs the focus and priority of management action to mitigate climate risk across the Group's risk types as set out in in pages 48-67 of the Group's 2024 Annual Report.</p> <p>The short-term financial impacts of climate change can be mitigated by holding adequate capital buffers and providing for expected credit losses (ECL) through impairment loss allowances. As the Group's range of models across risk types cannot fully address all emerging climate risk drivers at this time, the Group includes the outcome of the climate risk materiality assessment in its economic capital framework within the ICAAP. It is included as an additional economic capital requirement on top of the capital set aside for the key risk types.</p> <p>During 2024 the Group has also incorporated climate change into the measurement of credit impairment loss allowances through:</p> <ul style="list-style-type: none">• a climate shock embedded into one of the Downside Scenarios used in the Forward Looking Information (FLI) used to drive credit impairment loss allowances; and• a Post Model Adjustment (PMA) informed by analysis of the potential impact of physical and transitional climate related risks on asset valuations within its residential mortgage portfolios. This was extended in H1 2025 to include RoI SME non-property portfolios.
(b)	<p>Objectives, targets and limits to assess and address environmental risk in short-, medium-, and long-term, and performance assessment against these objectives, targets and limits, including forward-looking information in the design of business strategy and processes</p> <p>As a signatory of the UNPRB, the Group has committed to aligning its strategy and processes with the Paris Agreement and is actively contributing to three specific Sustainable Development Goals (SDGs) in the Environmental area: (i) SDG 7: Affordable and clean energy; (ii) SDG 11: Sustainable cities and communities; and (iii) SDG 13: Climate action.</p> <p>The Group Sustainability Committee's responsibilities include the following:</p> <ul style="list-style-type: none">- Monitoring the execution of the Sustainability Strategy 'Investing in Tomorrow', via periodic updates.- Overseeing and making recommendations to the Board on the proposed short and long-term objectives, and ESG metrics and targets. <p>2024 updates on key targets and limits set as part of the Group's Climate Transition Plan are as follows:</p>

Science Based Targets (SBTs)

In December 2022, the Group's 2030 greenhouse gas emission reduction targets were formally validated by the SBTi and are aligned with decarbonisation goals of the Paris Climate Agreement. Targets validated by SBTi cover the Group's own operations and 71% of its FY20 baseline loan book, with 2020 as base year for the targets. The Group has set a target of a 49% reduction in greenhouse gas emissions from its own operations (Scope 1 and 2) by 2030. Reduction targets have also been set for emissions arising from the Group's lending activities (Scope 3) of a 48% reduction in mortgage portfolio emissions (Ireland & UK), a 56% reduction in commercial real estate portfolio emissions by 2030, and a 76% reduction in electricity generation project finance portfolio emissions. In addition, 25% of the Group's corporate loan portfolio will have SBTi-validated targets by 2025.

As of FY2024 the Group is on track to meet its 2030 SBTs across RoI mortgages, commercial real estate, electricity generation project finance and its own operations. In addition, the Group reached its 2025 target for 25% of its Corporate lending customer base having their own SBTs.

Science Based Targets Progress Report FY2024

Own operations:

- Absolute Scope 1 & 2 emissions (Green - down 47% versus 2030 target reduction of 49%)
- Sourcing renewable electricity (Green – c.100% versus 2025 target of 100%)

Lending decarbonisation: Emissions intensity reduced across:

- Residential Mortgages (Amber - down 14% versus 2030 target reduction of 48%)
(ROI Mortgages Green – down 21%, UK Mortgages Amber – down 3%)
- Commercial Real Estate (Amber - down 28% versus 2030 target reduction of 56%)
- Electricity Generation Project Finance (Green - down 32% versus 2030 target reduction of 76%)

SBT lending coverage:

- % Corporate customer base to have set SBTs when weighted by emissions
(Green – 28% versus 2025 target of 25%)
- % Corporate bonds to have set SBTs when weighted by investment value
(Amber – 6% versus 2025 target of 25%)

The Group's progress is benchmarked against convergence pathways that in general reflect a linear progression to the targets. Where its progress to date is ahead or in line with the convergence pathway, the Group have assigned a green RAG rating. Where its progress is lagging the convergence pathway, the Group has assigned an amber RAG rating as the Group deems the lag to be recoverable by the target date. Progress accelerated in 2024 and the Group expects to report further progress towards its SBTs as the Group executes its strategy, with the full impact of decarbonisation of the energy grid expected in the back end of the decade.

For further details on progress against each target please refer to pages 68-71 of the Group's 2024 Annual Report.

The achievement of these targets is informing the Group's strategic interventions in terms of portfolio management, credit policy products and customer engagement and credit policy. By using these targets to align its lending portfolios to the Paris Agreement, the SBTs can help mitigate the climate-related credit risks associated with the green transition and ensure that the Group can address the opportunities to support the transition with measurable impact.

Sustainable Finance Targets

The Group is at the heart of the movement towards sustainability in Ireland, particularly in supporting the green transition in line with Ireland's Climate Action Plan. The Group's goal is to help its customers adapt to this change. A key part of its commitment is to develop financial products that support the transition. This aligns with the Group's dedication to the UNPRB.

The Group's range of sustainable finance products is carefully designed to help its customers make real, impactful changes. This includes green mortgages, loans for eco-friendly cars, and business loans for small and medium-sized enterprises (SMEs) and farmers, focusing on renewable energy, capital expenditure, and sustainability-linked lending. In 2024, the Group introduced the innovative Enviroflex loan, a new funding option for farmers to encourage sustainable farming practices. In H1 2024 the Group published its Sustainable Finance Framework to provide transparency to its stakeholders on its approach to Sustainable Financing. Within this framework, the Group is disclosing the criteria the Group uses to classify financial commitments and products as sustainable. For the latest information on Bank of Ireland's product offerings and supports please refer to page 24 of the Group's 2024 Annual Report.

As part of its commitment to the Green Transition, Bank of Ireland is constantly reviewing and expanding its range of Sustainable Finance solutions and in H1 2025 the Group launched a free online tool called the Sustainable Business Coach to help SMEs develop their environmental, social, and governance (ESG) plans. The Sustainable Business Coach helps businesses identify their sustainability goals and create a strategic plan, which can then be supported by the Group's Green Business Loan which can help fund the implementation of those initiatives through discounted finance.

The Group's approach to sustainable finance supports meeting its SBTs by reducing the greenhouse gas emissions that the business finances. With this science and policy-based approach, the Group can focus its resources where it matters to support credible action. The Group offers a growing portfolio of sustainable financing products and services, supported by its Green Bond programme. Through these offerings, the Group seeks to not only align with the national climate action plans in both Ireland and the UK, as well as the Paris Agreement, but also to provide tangible benefits to its customer base in a more sustainable way.

In line with its ambitions, in 2023 the Group set targets for sustainable financing: c.€15 billion by 2025 and c.€30 billion by 2030. The Group achieved its c.€15 billion target in H1 2025 and has made significant strides towards meeting its c.€30 billion target.

There are a number of lending controls that are de-risking the portfolio with respect to climate and other environmental risk:

- The Group has a Sustainability Exclusion list that sets out its ESG risk appetite for lending to potentially sensitive sectors which the Group believes cause environmental and/or social harm to society and the community.
- The Group has set limits on property energy ratings across its Commercial Real Estate and Buy to Let Residential Real Estate portfolios, with these credit policy amendments supportive of both the national agenda to retrofit existing property stock and the Group's decarbonisation SBTs.
- In 2024, climate risk metrics were included into the Group's risk appetite framework to de-risk the lending book, including limits on fossil fuel related activities.

Integration of Other Environmental Risk into Business Strategy

In conjunction with the enhanced materiality assessment for environmental risk conducted this year, the Group Sustainability Committee and Board Risk Committee endorsed the strategic course of action to address non-climate other environmental risks within the Group's business strategy through integration into its customer engagement strategies, sectoral strategies and lending procedures. See key points of integration below as part of the Group's overall Sustainability Strategy, in line with the UNPRB and ECB Guidelines on Climate-related and Environmental Risks.

1. Sustainable Finance and Customer Engagement

The Group seeks to steer its loan book in alignment with global goals on climate and the environment, starting with the Corporate and Commercial Banking sectors with the biggest impact. The Group does this through the choices the Group makes in its financing and the engagement the Group has with its customers. The Group offers Sustainable Finance products that incentivise customers to make business decisions that benefit the environment. This includes the EnviroFlex farm loan and the Green CapEx loan products. It also includes Sustainability-linked loans that reward customers for their sustainability performance, which can also relate to positive change for nature and ecosystems.

2. Promoting Environmental Awareness through Thought Leadership and Collaboration

Managing for positive environmental impact is about making sure that environmental factors are adequately understood, addressed and factored into relevant policies and practices, both internally and externally. The Group is building these capabilities in its own organisation through training and development initiatives, external collaboration and by providing thought leadership on key issues. To ensure that its customers benefit from its learnings, customer guidance and advisory supports are available through the Group's Green Hubs.

3. Managing Environmental Risks

Guided by the Group ESG risk management framework the Group works with its customers and suppliers to understand risks and impacts related to environmental matters and ensure these are mitigated. The Group does this for instance by applying strict environmental exclusion criteria in its lending decisions. The Group does not finance projects with direct impacts on certain high-value ecosystems and has also excluded certain economic activities that are incompatible with its concern for the environment. The Group also analyses the environment-related impacts across the industry sectors in its loan book. This information is guiding the Group's strategy on how best to address both the risks and opportunities this collective challenge presents to both the Group and its customer base (see Bank of Ireland's Food & Farming strategy below).

4. Supporting Ireland's Sustainable Food & Farming Transition (White Paper June 2024)

As the leading lender to Irish agriculture, with over 82,000 farm customers on its books, the Group has prioritised addressing environmental challenges in this key sector of the Irish economy. This paper sets out the Group's strategic approach to supporting the sector in addressing the environmental challenges and opportunities farmers and agri-business face. The Group has a dedicated sustainability and agri team supporting customers through advisory, lending procedures and ongoing collaboration on policy/leadership initiatives, and is providing innovative sustainable finance products like Enviroflex offered in collaboration with co-ops and food processors.

5 Own Operations

The Group also seeks to minimise the environmental impacts that arise from business activities related to its own operations. The mitigation of environmental risks is integrated into the Group's own operations and supply chain in line with the Group's Environmental policy and Code of Supplier Responsibility. The Environmental policy is reviewed annually as part of the ISO 14001 Environmental Management System certification process, which the Group is currently certified against.

The Group Code of Supplier Responsibility outlines its expectations of their suppliers across human rights, health and safety, supply chain, inclusion and diversity, business integrity, doing business responsibly and environmental and energy management. The Group ensures suppliers' compliance with its Code through the Financial Supplier Qualification System (FSQS) process.

Current investment activities and (future) investment targets towards environmental objectives and EU Taxonomy-aligned activities

In line with its ambitions, in 2023 the Group set targets for sustainable financing: c.€15 billion by 2025 and c.€30 billion by 2030.

A highlight in H125 was the achievement of its target to provide €15 billion in sustainable finance by the end of 2025 ahead of time, with the stock of lending standing at €15.5 billion at end-June 2025, +24% YoY. The Group are well placed to deliver on its ambition of growing this to €30 billion by the end of 2030.

Sustainable finance

Loans and advances to customers at 30 June 2025 included sustainable finance of €15.5 billion (31 December 2024: €14.7 billion), as detailed in the following table.

	30 June 2025 €bn	31 December 2024 €bn
RoI green mortgages	9.6	8.6
Green commercial real estate lending	1.9	2.2
Sustainability-linked loans	1.6	1.5
UK green mortgages	1.6	1.7
Renewables project finance	0.4	0.4
RoI electric vehicles funding	0.2	0.2
UK electric vehicles funding	0.2	0.1
Total sustainable finance	15.5	14.7

The Group has disclosed its EU Taxonomy Green Asset Ratio (GAR) KPIs for the second time in its 2024 Annual Report on pages 82-85. It should be noted that for this second round of disclosures the Group has continued to take a conservative application of the qualifying criteria underpinning the GAR based on the guidance provided to date and currently available data.

(d)	<p>Policies and procedures relating to direct and indirect engagement with new or existing counterparties on their strategies to mitigate and reduce environmental risks</p> <p>Subject to annual approval by the Group Board, the objective of the Group Credit Risk policy is to meet the legitimate credit needs of its customers, and the markets and communities in which the Group operates. The Group does this by serving its customers through delivering appropriate credit decisions that underpin the development of profitable customer relationships. Within the Group's credit procedures ESG factors are included as part of risk mitigation measures such as credit approvals and assessments, loan origination standards, external valuation standards and country risk limit management. For its commercial lending portfolios credit procedures have been informed by ECB publications on climate and environmental risk management good practices and set out the following steps to mitigate the potential for ESG Risks that may arise in the process of lending and granting credit.</p> <p>Step 1: Due Diligence – ESG Risk Screening For corporate and commercial customers, the Group examines climate and environmental considerations as part of its customer onboarding due-diligence process. This process is also conducted on an annual basis for existing customers. The business activity of the company or project will be checked against the list of excluded activities across particularly sensitive sectors which are considered by the Group to cause environmental and/or social harm to society and its communities. If the company or project is involved in the excluded activities it cannot be originated or renewed. Furthermore, any cases considered a heightened ESG risk will be subject to enhanced review and consideration by an ESG Risk Forum.</p> <p>Step 2: ESG Data Collection Key ESG risk factors for each asset class are captured during the lending process both at loan origination and throughout the credit lifecycle through reviews that take place at least on an annual basis. This can include information on the economic activity of a business and the energy ratings of properties.</p> <p>Step 3: Loan Acceptance Criteria Checks Each asset class has loan acceptance criteria that must be met and these include ESG criteria such as minimum EPC ratings, flood and subsidence insurance in the case of property lending. The Group set limits on property energy ratings across its Commercial Real Estate and Buy to Let Residential Real Estate portfolios, with these credit policy amendments supportive of both the national agenda to retrofit existing property stock and the Group's decarbonisation Science Based Targets.</p> <p>Step 4: Collateral Valuation The Group Property Collateral Valuations policy (and related Guidelines) require that market valuations should take into account ESG factors including property energy efficiency, environmental risks such as flooding, subsidence and pollution and social factors (infrastructure and amenities).</p> <p>Step 5: PD (Probability of Default) and Credit Rating Credit submissions and review papers are required to critically assess environmental risk factors and their impact on the financial condition of the borrowers and are addressed in the same context as any business risk or financial input. Non-retail PD models use a combination of quantitative factors (reflecting the financial characteristics of the counterparty) and qualitative factors. ESG considerations should be considered as part of a Lender's qualitative assessment of PD model inputs. The Group requires credit submissions to explicitly comment on a borrower's ESG policies, how it is incorporated into its strategic objectives and whether these are measured and evidenced. The Group acknowledges that each industry has its own specific ESG risk factors with varying impacts on borrowers, and relationship managers apply their analysis commensurate with the challenges identified. This adds relevance where a sector appears more vulnerable and potentially faces material costs associated with transitioning to achieve wider ESG objectives. The procedures set out the factors to consider across climate, environmental, social and governance dimensions.</p> <p>Step 6: ESG Risk Loan Conditions In cases where ESG Risk is heightened and have been through enhanced review at the ESG Risk Forum, consideration of mitigating actions through additional ESG risk loan conditions should be considered by lenders.</p> <p>Step 7: Sustainable Financing For commercial customers the Group offers a range of products that should be considered by lenders when engaging customers on how to support their transition plans to take sustainability action and de-risk their ESG Risk profile.</p> <p>Credit approval for residential mortgages is subject to the provision of an EPC (Energy Performance Certificate) and insurance for flood and other environmental risks including subsidence.</p> <p>As the Group continues to further review and update its credit risk policies and procedures, it has rolled out specific sustainability training programmes based on a multi-level curriculum to deliver core, foundational sustainability training to all colleagues as well as more targeted and technical skills development for select groups. Training solutions are tailored across three colleague cohorts at (1) All-Colleague, (2) Divisional; and (3) Board and Leadership levels to meet the different training outcomes being targeted. This includes all colleague training on climate concepts and processes, as well as role specific training on sustainable finance and ESG risk management tailored to the various customer facing divisions. This customer facing training covers key activities such as ESG risk management and sustainable finance, as well as sectoral deep dives on key transitional sectors such as Food & Agri, Energy and Real Estate.</p>
	<p>Governance</p>
(e)	<p>Responsibilities of the management body for setting the risk framework, supervising, and managing the implementation of the objectives, strategy, and policies in the context of environmental risk management covering relevant transmission channels</p> <p>ESG Governance</p> <p>Board Oversight of Sustainability</p> <p>The Board The Board is collectively responsible for the long-term sustainable success of the Group and for ensuring there is a strong corporate structure in place, which is aligned with the Group's strategy and purpose. It provides leadership of the Group, setting strategic aims, within the boundaries of the Group's risk appetite and a framework of prudent and effective controls. This responsibility involves regular communication and collaboration with various committees, including the Group Sustainability Committee (GSC) and Board Risk Committee (BRC), to monitor climate and other environmental-related risks and progress against ESG commitments such as SBTs and the UNPRB.</p> <p>Group Sustainability Committee On behalf of the Board, the GSC is responsible for guiding the development and direction of the Group's Sustainability Strategy, ensuring it aligns with key stakeholder interests and recommending it to the Board for approval. The GSC also manages the execution of the Sustainability Strategy, reviews key sustainability policies, and ensures alignment with the Group's purpose and long-term success and, together with the BRC), oversees related risks, including monitoring the Climate Risk Implementation Plan. Additionally, it supports the Group Audit Committee (GAC) in maintaining the integrity of the CSRD disclosures.</p> <p>Board Risk Committee On behalf of the Board, the BRC is responsible, jointly with the GSC, for ensuring that ESG risks are integrated into the risk management framework.</p> <p>Group Audit Committee On behalf of the Board, the GAC is responsible for monitoring the quality and integrity of the Group's financial statements, including sustainability disclosures. The level of GAC involvement on sustainability related matters has increased over the course of 2024. This is largely driven by the enhanced disclosure requirements under CSRD.</p> <p>Terms of reference for the GSC, BRC and GAC are available on the Group website. (https://www.bankofireland.com/about-bank-of-ireland/corporate-governance/court-committees/court-committees-terms-of-reference/)</p> <p>Executive Oversight of Sustainability</p> <p>Group Executive Committee (GEC) The most senior executive committee in the Group, the GEC, acts in an advisory capacity to the Group CEO and assists the CEO in the management and leadership of the Group on a day-to-day basis. The GEC has overarching responsibility for delivery and operationalisation of the Group's Sustainability Strategy, with specific executive responsibility for sustainability delegated to the Chief Sustainability and Investor Relations Officer (CSIRO) who reports to the Group Chief Strategy Officer (CSO) on sustainability-related matters. Members of the GEC include the CEO, CFO, CSO, Divisional CEOs and the Chief Risk Officer (CRO). The GEC receives regular updates on the progress against key initiatives from the Sustainability Decision Group (SDG). See below for details on the SDG.</p> <p>Executive Risk Committee (ERC) The ERC supports both the GEC and the BRC, in overseeing the material risks of the Group, taking a holistic approach to overseeing the effective management of risk, including ESG risks.</p> <p>Sustainability Decision Group The SDG brings together senior business and functional management across the Group to enable a coordinated approach to sustainability objectives across the three strategic pillars and to provide a discussion and decision-making forum to deliver on the Group's Sustainability Strategy. The SDG is chaired by the CSIRO and regularly updates the GEC on progress against key initiatives.</p> <p>Divisional and Subsidiary ESG Working Groups All materially impacted business divisions and businesses have in place dedicated ESG leads and ESG working groups to ensure ESG strategy and operational aspects are integrated into the Group's business model.</p> <p>ESG Risk Working Group The Group ESG risk management framework sets out the Group's approach to ESG risk management. Coordinated by Group Risk, the ESG Risk Working Group brings together 2LOD risk management from across the principal risk and sub risk types (with representation from 1LOD Group Sustainability) to ensure there is a coordinated, cohesive and challenging approach to the management of ESG risks within the Group.</p> <p>At the report date, the Board comprises 11 Directors: two Executive Directors, the Chairman, who was independent on appointment, and eight independent Non-Executive Directors (NEDs). The biographical details of each of the Directors, along with each of their individual dates of appointment, are set out on the Group website. Page 192 of the 2024 Annual Report provides further details on the diversity of the Board and its Committees and on the Board members' skills and experience. The Group Nomination & Governance Committee undertakes a rigorous and transparent procedure when considering candidates for appointment to the Board and maintains oversight of the Board's composition to ensure it remains appropriate.</p>
(f)	<p>Management body's integration of short-, medium- and long-term effects of environmental factors and risks, organisational structure both within business lines and internal control functions</p> <p>The Board monitors the Group's identification and management of climate and other environmental risks. Methods used include the Group's risk identification and assessment processes, integration into the Internal Capital Adequacy Assessment Process (ICAAP) and ESG risk reporting (including climate and other environmental risks). The Group's oversight and management responsibilities in relation to its sustainability commitments and ESG risk in 2024 are outlined on page 19 of the 2024 Annual Report. Page 221 references the BRC submission for approval to the Board of a risk appetite statement for ESG risk, including measures related to climate risk. The BRC recognises that climate risk concerns will grow in importance, and risk mitigation capabilities will evolve as this risk lens is further developed.</p> <p>The Group has continued to increase its understanding of the risks and opportunities that climate and other environmental change presents to its business strategy. The Group assesses the impact of ESG factors on an ongoing basis. These practices are evolving and continue to be enhanced and embedded in business activities. In parallel with ESG risk identification and assessment activities across the risk types, the Group also carries out material risks assessments annually, across the Group's principal risks. On an annual basis the Group undertakes a Climate and Other Environmental Materiality Risks Assessment which feeds into the Group's ICAAP. The outputs from this assessment also informs the Group's Double Materiality Assessment which is also undertaken on an annual basis.</p> <p>The potential impact of climate transition and physical risk drivers is assessed annually for each key risk type over the short (< 3 years), medium (3-5 years) and long-term (> 5 years) in the ICAAP process. The Group recognises ESG factors represent a common risk driver across the Group's principal and sub risk types. The Group ESG risk management framework sets out the approach to the management of ESG risk factors in the Group. Co-ordinated by Group Risk, the ESG Risk Working Group brings together 2LOD risk management from across the principal and sub risk types (with representation from 1LOD Group Sustainability) to ensure that there is a coordinated, cohesive and challenging approach to the management of ESG risks within the Group.</p> <p>ESG risk factors such as climate and other environmental risks are managed within the framework the Group has in place for its established risk types. Therefore, the Group has integrated the management of climate and other environmental risk into its existing policies, controls, reporting and operating procedures, in accordance with the ECB guidelines on the management of climate-related and environmental risk.</p> <p>•First Line of Defence (1LOD): The business divisions or functions taking on risk have the primary responsibility for managing the risk generated by their actions and this includes managing ESG risk factors. •Second Line of Defence (2LOD): 2LOD has the responsibility for ensuring that ESG risk factors are considered when executing second line responsibilities as set out in the Group risk management framework. This includes consideration as part of policy setting and taking reasonable steps to ensure the Group does not suffer outcomes outside of risk appetite. •Third Line of Defence (3LOD): 3LOD is responsible for ensuring the first and second lines of defence assess whether all significant risks are identified and appropriately reported by management to the executive and board of management, as well as assessing whether risks are adequately controlled.</p> <p>While ESG risk management is managed through the Group's principal and sub-risk types, the Group also has dedicated resources to lead the coordination of the Group's approach to ESG risk management, both in 1LOD (Sustainability Team, Group Strategy) and in 2LOD (Business, Strategic and ESG Risk Team, Group Risk).</p>

(g)	<p>Integration of measures to manage environmental factors and risks in internal governance arrangements, including the role of committees, the allocation of tasks and responsibilities, and the feedback loop from risk management to the management body covering relevant transmission channels</p> <p>Refer to the Group's answers to: (a) above for details on the Group's Board tasks and responsibilities in managing environmental factors and risks within internal governance arrangements. (e) above for details on the Group's organisation of Board committees (BRC and GSC) related to environmental risk and allocation of tasks and responsibilities within those committees to monitor and manage environmental risk.</p> <p>The Group has a reporting line between the BRC, GSC and the Board covering environmental factors and risks. The GSC and BRC receive quarterly updates related to climate and other environmental risks and the Board receives monthly updates via the Board Risk Report. The BRC/GSC holds a joint meeting on at least an annual basis and the Board is updated accordingly on ESG Risk.</p>
(h)	<p>Lines of reporting and frequency of reporting relating to environmental risk</p> <p>There is Board-level oversight of climate-related risks within the Group, provided by the Board and its GSC and BRC. The Board, GSC and BRC are supported by: - Sustainability and climate advisory forums comprising the SDG and the ESG Risk Working Group - Sustainability and climate executive oversight is provided by the GEC and the ERC</p> <p>For further details on the Group's governance arrangements, please refer to answer (e) above and page 19-20 in the Group's 2024 Annual Report.</p> <p>For further details on internal reporting frequency, refer to the Group's answers to (a) and (g) above.</p> <p>Board and Executive monitoring of climate and other environment related risks The Group has developed methodologies to allow climate and other environmental risk to be actively measured and monitored by the Group and to track the effectiveness of policies, in a similar manner to other key risk types:</p> <p>•The Board Risk Report (BRR) is used by the Board to review and monitor the Group's risk profile across all principal risks, compliance with risk appetite and risk policies. ESG risk in the Group is reported through the BRR on a minimum quarterly basis and is the primary source of reporting for the impact of ESG-related risks on the Group's risk profile; and •Key risk metrics on the lending portfolio are monitored by the GEC and GSC on a quarterly basis and are aligned to Pillar 3 ESG reporting to ensure transparency and comparability. These include: -Exposure to Transition Climate Risks; -Credit concentrations to sectors most sensitive to climate change; -The energy efficiency profile of property lending portfolios; -Weighted Average Carbon Intensity (WACI); -Emission reduction progress against SBT pathways; -Sustainable Finance Lending Volumes progress against Strategic Targets; -Exposure to Physical Climate Risks; -Geographical credit concentrations exposure to physical climate risks; and -Other Environmental Risks.</p> <p>During 2024 environmental reporting was enhanced to monitor sectoral concentration metrics with respect to Pollution, Water Stress and Biodiversity impacts using the WWF (World Wildlife Fund) Biodiversity Risk Filter tool. Further external metrics are monitored to inform risk management including the relative global rankings of Ireland and the UK in terms of environmental policy as well as local EPA (Environmental Protection Agency) assessments.</p>
(i)	<p>Alignment of the remuneration policy with institution's environmental risk-related objectives</p> <p>In November 2022, the Irish Government announced that a number of crisis-era restrictions related to remuneration were being lifted in respect of the Group, including the blanket prohibition on variable pay. Reintroducing an element of variable pay will allow us to better link remuneration to delivery for customers and the achievement of its long term strategic and commercial goals.</p> <p>As announced in the Group's strategy refresh in March 2023, 'Sustainable Company' is now one of the core strategic pillars of the Group, of which supporting wider society is a key focus area. With 'Sustainable Company' now a core strategic pillar, ESG is mainstreamed into the Group's performance management system.</p> <p>In 2023, the Group introduced a performance-related Profit Share Scheme which will see colleagues rewarded based on both the financial and operating performance of the company and individual performance. The appropriateness of the annual profit share is assessed against a mix of financial and non-financial criteria, including profit and related metrics, affordability, customer, and ESG, with the pool as a whole subject to risk adjustment. Environmental criteria include progress on the Group's Green Transition strategic targets.</p> <p>In making the assessment for 2024 the Group Remuneration Committee took into consideration the strong progress against the Group's climate initiatives of increasing green / sustainable financing as well as other ESG factors (customer engagement and employee engagement).</p>
Risk management	
(j)	<p>Integration of short-, medium- and long-term effects of environmental factors and risks in the risk framework</p> <p>On an ongoing basis, through its risk management frameworks and processes, the Group identifies and assesses risks to which the Group is exposed to, including climate and other environmental risks. Due to the longer timeframes associated with climate and environmental impacts, a short, medium, and long-term horizon, as referenced in (a) and (e) above, is being applied to the consideration of impacts.</p> <p>The Group continues to embed climate and other environmental risk considerations into key risk reporting, as referenced in (g) above.</p>
(k)	<p>Definitions, methodologies and international standards on which the environmental risk management framework is based</p> <p>The Group ESG Risk Management Framework This framework sets out the approach to the management of ESG risk factors in the Group. ESG risk management is relatively immature across the industry and continues to evolve. Implementation to date, in the Group and industry, has largely focused on climate-related risk and other environmental (non-climate risk) drivers with regulatory expectations set out in the ECB Guide on Climate-related and Environmental Risks (November 2020). In 2024, the management of ESG risk in the Group continued to develop and expand. The Group has leveraged the requirements of the EU CSRD to expand disclosures in relation to the identification and management of ESG risks.</p> <p>The Group defines two key sub-categories of environmental risks that impact its business (in line with the ECB Guide on Climate-related and Environmental Risks). These are the risks associated with the transition to a low carbon economy and from climate-related physical events. In defining these sub-categories, the Group has drawn on the recommendations of the Taskforce on Climate-related Financial Disclosures (TCFD) and the Taskforce on Nature-related Financial Disclosures (TNFD).</p> <p>The Group's strategic commitment to supporting its customers' green transition is underpinned by its management of the risks associated with climate and other environmental change. The Group does this by embedding climate and other environmental related impacts in key decision making processes.</p> <p>Aligning to the ECB Guide on Climate-related and Environmental Risks (November 2020), the Group has progressively embedded climate and other environmental risk considerations in business and risk management processes.</p>
(l)	<p>Processes to identify, measure and monitor activities and exposures (and collateral where applicable) sensitive to environmental risks, covering relevant transmission channels</p> <p>Supporting the green transition also requires the Group to assess its own resilience to climate change. To address this requirement, the Group is taking steps to develop scenario analysis and stress testing capabilities in-line with emerging industry methodologies. Forward-looking climate scenarios are being used to manage climate-related risks and explore the resilience of the Group to physical and transition risks. The Group has further built on initial methodology developments and in 2023 developed scenarios internally to assess these impacts. As these methodologies continue to develop, the Group will be progressively drawing on its scenario analysis to inform its corporate strategy, business model and financial plans. The ICAAP is a key planning process for the Group and facilitates the Board and senior management in identifying, measuring and monitoring the Group's risks and ensures that the Group holds adequate capital to support its risk profile.</p> <p>The Group has integrated climate into the ICAAP and its broader scenario analysis framework to assess the impacts of climate and other environmental risk factors on different risk types (e.g. credit, business, operational, conduct and regulatory). The potential impact of transition and physical risk drivers is assessed for each key risk type over the short (< 3 years), medium (3-5 years) and long-term (> 5 years).</p> <p>The Group assesses the impact of ESG factors on an ongoing basis. These practices are evolving and continue to be enhanced and embedded in business activities. In parallel with ESG risk identification and assessment activities across the risk types, the Group also carries out material risks assessments annually, across the Group's principal risks. On an annual basis the Group undertakes a Climate and Other Environmental Materiality Risks Assessment which feeds into the Group's ICAAP. The outputs from this assessment also informs the Group's Double Materiality Assessment which is also undertaken on an annual basis.</p> <p>In addition, Climate and Other Environmental Risk Management Reporting is also provided to the GEC and GSC on a quarterly basis. The Group also has set lending related risk appetite metrics in relation to Climate and Other Environmental Risk which are reported on quarterly to the BRC and Board as part of Board Risk Reporting. The following key metrics on the credit lending portfolio including credit concentrations are monitored in internal reporting aligned to Pillar 3 ESG reporting:</p> <p>Exposure to Transition Climate Risks; • Credit concentrations to sectors most sensitive to climate change; • The energy efficiency profile of property lending portfolios; • Weighted Average Carbon Intensity (WACI); • Emission reduction progress against SBT pathways; and • Sustainable Finance Lending Volumes progress against Strategic Targets. Exposure to Physical Climate Risks; • Geographical credit concentrations exposure to physical climate risks; and • Other Environmental Risks – see answer (h) for further details.</p> <p>In terms of portfolio mix, the Group has no direct exposure to fossil fuels in energy and extraction, and as a predominantly retail lending bank, c.74% of its customer lending is in residential and commercial property and car finance.</p> <p>The breakdown table on page 57 of the Group's 2024 Annual Report shows the current composition of its commercial lending portfolio and the percentage of lending to sectors the Group considers most sensitive to climate change. This assessment also highlights that the Group's direct exposure to fossil fuels and to commercial lending segments with high emissions is relatively low (with the exception of the agricultural sector, which due to its specific challenges will require broader support in which the Group will play an active role. This year, the Group continue to roll out across the sector the innovative Enviroflex loan, a new funding option launched in 2023 for farmers to encourage sustainable farming practices.</p> <p>In terms of the Group's property lending portfolios the energy efficiency of the property stock is monitored quarterly – see table on page 57-58 of the Group's 2024 Annual Report. Quarterly monitoring of physical risks is also conducted with a property level assessment of property collateral exposure to heightened flood risk - see pages 58-60 of the Group's 2024 Annual Report.</p>
	<p>Activities, commitments and exposures contributing to mitigate environmental risks</p> <p>The Group's key risk mitigation strategy is as follows: (i) The Group has committed to SBTs aligning its lending portfolios on a pathway to the Paris Agreement and reducing the carbon emissions that the Group finances. This portfolio alignment will additionally build resilience against climate-related risks as the Group progressively embeds climate-related considerations into its lending strategies; and (ii) The Group has committed to supporting its customers' transition to the green economy with sustainable financing to improve the energy efficiency of their properties, vehicles and business operations and adapting to climate change.</p> <p>In 2022, the Group's 2030 greenhouse gas emission reduction targets were formally validated by the SBTi. For more information, refer to (b) above.</p> <p>In line with its ambitions, in 2023 the Group set targets for sustainable financing: c.€15 billion by 2025 and c.€30 billion by 2030. The Group achieved its c.€15 billion target in H1 2025 and has made significant strides towards meeting its c.€30 billion target – see Section (c) above.</p> <p>While it is not assessed as a material focus area for the Group at this point in time, environmental risk mitigation is integrated into its customer engagement strategies, sectoral strategies and lending procedures as part of its overall Sustainability Strategy, in line with the UNPRB and ECB Guide on Climate-related and Environmental Risks. See section (b) above for details.</p> <p>The Group finances the development of renewable energy assets, green mortgages, sustainable transport, and the national decarbonisation agenda that aligns with the SDGs identified in (b) above.</p>

(m)	<p>The Group has aligned its lending strategy, which includes the Sustainability Exclusion List, to minimise its exposures to climate and other environmental high-risk sectors. In addition, during 2023, the Group set limits on property energy ratings across its Commercial Real Estate and Buy to Let Residential Real Estate portfolios, with these credit policy amendments supportive of both the national agenda to retrofit existing property stock and the Group's decarbonisation SBTs. In 2024, the Board approved a risk appetite statement for ESG risk, including measures related to climate risk.</p> <p>The Group continues to develop methodologies to enable climate and other environmental risk to be actively measured and monitored in a similar manner to other key risk types. These methodologies are being developed collaboratively with peer institutions through engagement in industry initiatives (such as the UNEP FI TCFD Working Group and climate-focused European Banking Federation Working Groups).</p> <p>The Group assesses the impact of ESG factors on an ongoing basis. These practices are evolving and continue to be enhanced and embedded in business activities. In parallel with ESG risk identification and assessment activities across the risk types, the Group also carries out material risks assessments annually, across the Group's principal risks. On an annual basis the Group undertakes a Climate and Other Environmental Materiality Risks Assessment which feeds into the Group's ICAAP. The outputs from this assessment also inform the Group's Double Materiality Assessment which is also undertaken on an annual basis.</p> <p>To progress further action on nature, the Group participates in several key initiatives to help improve its understanding of its impacts, dependencies, risks and opportunities. This included participation in the TNFD Forum, the Partnership for Biodiversity Accounting Financials (PBAF), and the UNPRB Nature Target setting working group. The Group was also one of six inaugural partner organisations that supported the development of the first Irish Business and Biodiversity Platform. In 2024, the Group continued to uphold its voluntary commitments around nature and built on its previous work with the UNEP FI PRB by joining the Pollution Working Group during 2024/25. The Group will continue to monitor the evolving regulatory and wider stakeholder approach to Nature as the Group prepare for the upcoming refreshed Sustainability Strategy in 2026.</p> <p>The Group has integrated climate KPIs in its strategic planning framework to ensure its progress against objectives laid out under the Sustainability Strategy is measurable. These activities form the foundation of the Group's future risk analysis and target setting activities, leading to mitigation activities to help reduce future environmental risks to the Group, as well as to improve the Group's impact on the external environment.</p>
(n)	<p>Implementation of tools for identification, measurement and management of environmental risks</p> <p>In identifying, measuring and managing environmental risk, the Group uses the following tools:</p> <ul style="list-style-type: none">•Scenario Analysis - Given the long time horizon associated with climate change, scenario analysis is considered a key tool to inform strategic direction and risk management. The Group is continually developing its climate and other environmental scenario analysis capabilities on an iterative basis, leveraging improvements in data and methodologies as they become available. Climate and other environmental scenario analysis is integrated within the ICAAP process in order to increase its understanding and insights into the potential impacts of climate and other environmental risk factors.•Transition Pathways – Its decarbonisation SBTs are independently validated based on their alignment to internationally recognised transition pathways. the Group RAG rate its progress towards its targets based on these transition pathways as a key assessment tool of its level of progress.•Third Party Data Models – the Group integrates third party data sources and models to ensure coverage and insight on key climate risk factors including physical risks, primarily flood risk and transition risk – company emissions and property energy ratings.•Credit Procedures - Corporate and commercial lenders are required to implement the requirements of the ESG screening process and incorporate ESG and climate change as a key credit risk which should be formally noted / documented where applicable in the credit rating and application process in the same way as other credit risks relevant to a transaction are highlighted and mitigants detailed.•Supplier Management: Through its membership of the FSQS (Financial Supplier Qualification System), its on-line portal enables suppliers to submit environmental information and compliance data about their organisation.
(o)	<p>Results and outcome of the risk tools implemented and the estimated impact of environmental risk on capital and liquidity risk profile</p> <p>See response to (l) above which addresses how the Group has integrated climate into the ICAAP and its broader scenario analysis framework to assess the impacts of climate on different risk types.</p> <p>For each principal risk type the potential impact of transition and physical risk drivers is assessed for each key risk type over the short (< 3 years), medium (3-5 years) and long-term (> 5 years), with materiality categorised across four buckets (Negligible; Low; Moderate; and Significant).</p> <p>The impact on capital adequacy is from the risk of increased capital depletion from the aggregated impact of climate risks across the Group's other principal risks. It is categorised as significant and is incorporated into the quantitative assessment of the Group's capital adequacy under the ICAAP Economic Perspective.</p> <p>As the Group's range of models across risk types cannot fully address all emerging climate risk drivers at this time, the Group includes the outcome of the climate and other environmental risk materiality assessment in its economic capital framework within the ICAAP. It is included as an additional economic capital requirement on top of the capital set aside for the key risk types.</p> <p>During 2024 the Group has also incorporated climate change into the measurement of credit impairment loss allowances through:</p> <ul style="list-style-type: none">• a climate shock embedded into one of the Downside Scenarios used in the Forward Looking Information used to drive credit impairment loss allowances; and• a Post Model Adjustment (PMA) informed by analysis of the potential impact of physical and transitional climate related risks on asset valuations within its residential mortgage portfolios. This was extended in H1 2025 to include RoI SME non-property portfolios. <p>Climate risk scenario analysis for funding & liquidity risk integrated into the Group's internal liquidity adequacy assessment process (ILAAP) as well as the ICAAP. The Group's liquidity risk profile does not include instruments where climate concerns may significantly impact funding and liquidity pools. Based on ongoing scenario analysis, impact materiality is classified as negligible.</p>
(p)	<p>Data availability, quality and accuracy, and efforts to improve these aspects</p> <p>Given the criticality of data to the climate risk management agenda, a multi-year data and technology roadmap was developed as part of the 2022 planning cycle to support delivery of the data needed to meet the evolving requirements on an agile and iterative basis. The roadmap saw an initial focus in 2022 on aggregating a golden source of data to support upcoming external and regulatory reporting requirements and to support progressive enhancements to risk management methodologies and reporting. Third party data has been onboarded from Moody's and JBA Risk Management to provide data insights on physical risks, including flood risk assessments across residential and commercial property in RoI and the UK. Modelled estimates by ICE Data Services on emissions and transition risk impacts were integrated during 2023 to supplement internal data collection and analysis on the Group's portfolios. This developing capability was strengthened further in 2023 with the development focus moving to integrate ESG/climate data in front-end systems to aid credit and pricing decisions and support customers' transition plans.</p> <p>Climate KPI and Risk Management Reporting is centrally produced on a quarterly basis by the Group Sustainability function, with internal reporting definitions and data structures aligned to external Pillar 3 ESG Reporting to ensure transparency and comparability. This centralised reporting dataset also forms the basis for forward looking scenario analysis to assess climate and other environmental risk drivers.</p> <p>Data quality is continually tracked and disclosed in annual reporting with the use of PCAF (Partnership for Carbon Accounting Financials) data quality scores used to rate the quality of data used in the Group's SBT and financed emissions reporting. Additionally, the level of actual EPC data used in monitoring transition risk in the property portfolios is disclosed.</p> <p>Improving data quality is a high priority and the Group has made significant interventions to improve the quality and coverage of climate and other environmental data in 2024:</p> <p>(1) The Group continues to include the full range of Pillar 3 ESG risk metrics used in its internal reporting within the limited assurance scope for its Annual Report under CSRD. This provides internal and external users of the data assurance across the full spectrum of climate metrics.</p> <p>(2) 2024 saw system implementation of BER data capture (Building Energy Ratings – the Irish equivalent of EPC) and the launch of EcoSaver which incentivises RoI Mortgage customers to provide EPC ratings for properties. These actions have seen substantial progress on increasing EPC data coverage on the portfolio during 2024 by c.€5bn, ending FY24 at 14% from 0% end FY23. See page 57 - 58 of the 2024 Annual Report. For this reporting period coverage further increased to 23% at end of H1 2025.</p> <p>(3) The Group reported Financed Emissions across its customer lending portfolio for the first time in the 2024 Annual Report including customer emissions across Scopes 1, 2 and 3. The reporting provides a breakout of customer lending by NACE sectors for non-financial corporates and by location (RoI and UK) for residential mortgages and car finance. The Group is leveraging these financed emissions estimates and has introduced a WACI (W eighted Average Capital Intensity) metric to its internal board level reporting to inform portfolio strategies to decarbonise the lending portfolio and mitigate climate-driven credit risk.</p> <p>(4) During 2024 internal environmental reporting was enhanced to monitor sectoral concentration metrics with respect to Pollution, Water Stress and Biodiversity impacts using the WWF Biodiversity Risk Filter tool developed as an industry standard for banks – see answer (h) for further details.</p>
(q)	<p>Description of limits to environmental risks (as drivers of prudential risks) that are set, and triggering escalation and exclusion in the case of breaching these limits</p> <p>The Group has published a Sustainability Exclusion List that sets out the Group's risk appetite for lending to potential environmentally sensitive sectors. This list applies to all new lending and existing customers ensuring that the Group does not provide new financing to customers who are deemed to engage in a defined list of excluded business activities. Any breaches to these exclusions represent a breach of the Group's risk appetite and are escalated to the Board in line with the requirements of the Group's risk management framework. Any cases considered a heightened ESG risk during initial review will be subject to 'Enhanced Review' and will be considered by an ESG Risk Forum prior to credit review.</p> <p>The Group has aligned its Screening Criteria to its Sustainability Exclusion List. For further details on this process and its governance arrangements, please refer to the Group's disclosure in Governance Risk Template. In addition, during 2023, the Group set limits on property energy ratings across its Commercial Real Estate and Buy to Let Residential Real Estate portfolios, with these credit policy amendments supportive of both the national agenda to retrofit existing property stock and the Group's decarbonisation SBTs. In 2024, climate risk metrics were included into the Group's risk appetite framework to de-risk the lending book.</p> <p>Any breaches to these restrictions are escalated in the same manner as any credit exception as set out in the Group's risk management framework.</p> <p>The Group also has set lending related risk appetite metrics in relation to ESG Risk which are reported on quarterly to the BRC and Board as part of Board Risk Reporting with any breaches escalated to the Board in line with the requirements of the Group's risk management framework.</p>
	<p>Description of the link (transmission channels) between environmental risks with credit risk, liquidity and funding risk, market risk, operational risk and reputational risk in the risk management framework</p> <p>Climate and other environmental risk drivers can intensify risks to the Group, impacting across existing key risk categories including, but not limited to:</p> <ul style="list-style-type: none">•Credit risk: Increased costs associated with physical and transition risks may impact financial soundness of households and businesses reducing their ability to service debt and impairing asset values, resulting in financial loss to the Group through higher probability of default and higher losses given default.•Business and Strategic risk: Long term franchise impacts if strategic commitments are not achieved by the Group and the Group's product offering does not adapt to changing market dynamics.•Operational risk: Physical risks could impact continuity of the Group's operations or operations of its material suppliers, resulting in sustained disruption of the supply chain and ultimately its ability to service customers.•Conduct risk: Potential impact if failures in product design, market practice or customer engagement lead to greenwashing claims or poor customer outcomes. <p>Climate and other environmental risk can also have reputational impacts if the Group fails to meet investor, customer, community and regulatory expectations.</p> <p>On an ongoing basis, through its risk management frameworks and processes, the Group identifies and assesses risks to which the Group is exposed. The Group ensures appropriate identification of risk through both top-down and bottom-up risk identification processes. A standard risk library is used to define all of the Group's risks in a consistent manner. Principal risks are the highest-level categorisation used to assist with identifying, assessing, monitoring and mitigating risks to which the Group is exposed. ESG factors represent a common risk driver across the Group's principal risk types. The Group ESG risk management framework sets out the approach to the management of ESG risk factors in the Group.</p> <p>The subsequent table details the current position on the mitigation of climate and other environmental risk drivers across the Group's principal risk types.</p>

(f)	Principal Risk Types	What are we doing to mitigate climate and environmental risk drivers	Mitigates climate Risk drivers	Mitigates other environmental Risk drivers
	1. Credit risk	<ul style="list-style-type: none">• Credit Risk Policy and Procedures: ESG risks form part of lifecycle credit assessment (both at origination and ongoing review points).• Collateral Valuation Procedures: Consideration of transition and physical risk included in collateral valuation guidance and minimum loan agreement requirements (covering EPC Ratings, Physical risks such as Floods, Subsidence)• Limits and Controls: Credit policy limits on property energy ratings (Commercial Real Estate Buy to Let); requirements for flood and subsidence insurance.• Scenario Analysis: Climate and Environmental risk scenario analysis for Credit Risk integrated into the Group ICAAP• Sustainable Finance and Customer Engagement: Ongoing engagement with customers on sustainability action and ongoing product development of a range of supportive Sustainable Finance (SF) products.• Monitoring and Reporting: Monitoring by Executive and Board Committees on status versus a range of Sustainability KPIs including climate and environmental risk metrics.	<ul style="list-style-type: none">✓ Exclusion and enhanced review criteria cover climate risk drivers (eg fossil fuels)✓ Covers climate risk drivers (eg flood, property energy efficiency)✓ Covers climate risk drivers (e.g. excluded activities, EPC ratings, flood cover)✓ Quantified from ICAAP 2023✓ Sustainable Finance Targets encompass lending products to improve climate impacts (EcoSaver)✓ Sustainability reporting monitors climate risk KRIs	<ul style="list-style-type: none">✓ Exclusion and enhanced review criteria cover environmental risk drivers (eg mining activities impacting water and soil quality)• Guidance covers (i) natural environmental potential risks such as flooding, subsidence etc. and (ii) non-natural potential risks such as land contamination✓ Covers environmental risk drivers (e.g. excluded activities, flood and subsidence insurance cover)✓ Introduced in ICAAP 2024✓ Sustainable Finance Targets encompass lending to improve environmental impacts (Enviroflex)✓ Sustainability reporting monitors environmental risk KRIs
	2. Market risk	<ul style="list-style-type: none">• Scenario Analysis: Climate and environmental risk scenario analysis for Market risk integrated into the Group ICAAP	<ul style="list-style-type: none">✓ Non-material impacts	<ul style="list-style-type: none">✓ Non-material impacts
	3. Funding & Liquidity risk	<ul style="list-style-type: none">• Scenario Analysis: Climate and environmental risk scenario analysis for Funding & Liquidity risk integrated into the Group's internal liquidity adequacy assessment process (ICAAP)	<ul style="list-style-type: none">✓ Non-material impacts	<ul style="list-style-type: none">✓ Non-material impacts
	4. Life Insurance risk	<ul style="list-style-type: none">• Scenario Analysis: Climate risk scenario analysis for life insurance risk is part of the ORSA (Own Risk & Solvency Assessment) process for the New Ireland entity which calculates the business risk of risk and	<ul style="list-style-type: none">✓ Non-material impacts	<ul style="list-style-type: none">✓ Non-material impacts
	Principal Risk Types	What are we doing to mitigate climate and environmental risk drivers	Mitigates climate Risk drivers	Mitigates other environmental Risk drivers
	5. Business & Strategic risk	<ul style="list-style-type: none">• Business and Strategic Risk Policy: requires ESG risk factors to be reflected in strategic planning and internal and external business environment assessments.• Group Strategy Implementation: Sustainable company is a key strategic pillar underpinned by Group Objectives and Key Results (OKRs) (including risk OKRs)	<ul style="list-style-type: none">✓ Climate Risk Assessments have been embedded into Strategy and ICAAP planning since 2023✓ Sustainable Finance Targets encompass lending products to improve climate impacts (EcoSaver)	<ul style="list-style-type: none">✓ Environmental Risk Assessments have been embedded into Strategy and ICAAP planning since 2024✓ Sustainable Finance Targets encompass lending to improve environmental impacts (Enviroflex)
	6. Operational risk	<ul style="list-style-type: none">• Group Environmental Policy: This policy guides our identification control and reduction of significant environmental impacts associated with our own operations. This policy is reviewed annually as part of certification of the ISO 50001 Energy Management System and ISO 14001 Environmental Management System (EMS)• Scenario Analysis: Climate and environmental risk scenario analysis for Operational risk integrated into the Group ICAAP and Business Continuity Mission Critical Services Scenario Analysis• Third Parties and Outsourcing: ESG (including climate change) is part of supplier due diligence assessment in line with the Group's Code of Supplier Responsibility• Data Risk: Standard group control framework applies to climate data• Model Risk: Climate risk factors to be considered in models including assessing data collection requirements to enable inclusion in models.	<ul style="list-style-type: none">✓ Drives reduction in consumption of electricity, gas and oil and associated carbon emissions✓ Material impacts assessed given systemic changes in heat levels and weather patterns✓ Suppliers encouraged to have ISO 50001 Energy Management System certification✓ Climate and environmental data used in reporting in line with relevant Group standards and subject to external assurance where applicable✓ Climate Scenario Analysis Framework (Incorporating other environmental risk factors) subject to second line independent validation	<ul style="list-style-type: none">✓ Mitigates the environmental impacts associated with water and paper consumption, waste management and suppliers.✓ Non-material impacts based on assessment✓ For Environmental Impacts suppliers are:<ul style="list-style-type: none">• expected to have Environmental Sustainability Policy• encouraged to have ISO 14001 Environmental Management System (EMS) certification
	Principal Risk Types	What are we doing to mitigate climate and environmental risk drivers	Mitigates climate Risk drivers	Mitigates other environmental Risk drivers
	7. Conduct risk	<ul style="list-style-type: none">• Group Customer Protection Risk Policy requires mitigation of greenwashing risk. ESG considerations are incorporated in new product approvals and ongoing product lifecycle reviews for all product/service/channel initiatives that are classified or marketed as a Green/ ESG proposition to mitigate potential claims of 'Greenwashing'.• Sustainability Training: All colleague training on climate concepts and processes, as well as role specific training on sustainable finance and ESG risk management.	<ul style="list-style-type: none">✓ ESG Risks and objectives in new product approvals and ongoing product lifecycle reviews incorporates climate risk factors✓ Sustainability training programme covers climate risk drivers	<ul style="list-style-type: none">✓ ESG Risks and objectives in new product approvals and ongoing product lifecycle reviews incorporates environmental risk factors.✓ Sustainability training content to be iterated for increasing focus on environmental matters.
	8. Regulatory risk	<ul style="list-style-type: none">• Upstream Regulatory Change Monitoring: ongoing horizon scanning with quarterly ILDD/2LOD meeting to review any developments captured in climate regulation applicable to the Group	<ul style="list-style-type: none">✓ Ongoing horizon scanning conducted for climate related regulation	<ul style="list-style-type: none">✓ Ongoing horizon scanning conducted for environmental related regulation
	9. Capital Adequacy risk	<ul style="list-style-type: none">• ICAAP Integration: Aggregation into ICAAP quantitative Climate Risk Assessment across principal risk types.	<ul style="list-style-type: none">✓ Integrated into the ICAAP process since 2023	<ul style="list-style-type: none">✓ Integrated into the ICAAP process since 2024
<div><div>Previous</div><div>Index</div><div>Next</div></div>				

Table 2 - Qualitative information on Social risk in accordance with Article 449a CRR

Row number	Business strategy and processes
	<p>Adjustment of the institution's business strategy to integrate social factors and risks taking into account the impact of social risk on the institution's business environment, business model, strategy and financial planning</p> <p>Strategy and processes</p> <p>As noted above, social factors have been considered within the Group's Sustainability Strategy. The Group's Sustainability Strategy takes into account changes in technology, business, environmental and stakeholder preferences, reflecting key social factors, under the 'Enhancing financial wellbeing', 'Enabling colleagues to thrive' and 'Foundations' pillars.</p> <p>The activities below demonstrate the ongoing implementation of the Group's Sustainability Strategy to integrate social factors and risks.</p> <p>In FY24, a Double Materiality Assessment, aligned to the Corporate Sustainability Reporting Directive (CSRD), using the double materiality concept was conducted across ESG (including social) topics. The results help inform the Group's continuing actions on social factors and risks thereby ensuring its strategy implementation continues to support the requirements of its stakeholders and society.</p> <p>‘Enhancing financial wellbeing’:</p> <ul style="list-style-type: none">•Fostering financial inclusion – The Group's ambition is to ensure inclusive and effective access to products and services for priority groups, striving to leave no one behind on the journey to financial health.•Improving financial literacy and capability – The Group's ambition is to empower people (including colleagues) with the knowledge and skills to help improve their financial literacy and capability which are key building blocks on the journey to financial health.•Building a more financially resilient and confident Ireland - The Group's ambition is to increase the number of customers and colleagues who have the resilience to withstand the financial impact of an unexpected day-to-day expense or a major life event. <p>‘Enabling Colleagues to Thrive’:</p> <ul style="list-style-type: none">•Build a future ready workforce - An essential part of its people strategy is developing growth skills and capabilities.•Create a differentiated colleague experience - the Group continues its journey to be an employer of choice through leading edge colleague supports, flexibility and an enhanced reward proposition.•Simplify its ways of working - Its hybrid work model recognises that one size does not fit all enabling teams and leaders to interpret hybrid working for their unique needs and purposes. <p>'Foundations': To enable the Group to operate as a sustainable company, it is crucial to have solid foundations. Transparently managing, monitoring and disclosing against these foundational topics supports the Group's efforts to build and maintain the trust the Group has with its key stakeholders. The Group's Foundation topics consist of: Sourcing responsibly, Business ethics, Financial Crime, Health & Safety, Culture, Human Rights, Cyber Security, Data protection and Community Investment. Housing is also a material topic from a CSRD perspective and so reported here under 'Foundations'.</p> <p>Outcomes 2024: the Group made significant progress on its social commitments in 2024 with examples of key Group activities under each of its key strategic headings below.</p> <p>Financial Wellbeing: the Group continues to be the #1 bank recognised for financial wellbeing in the Irish market and have made the following progress during 2024:</p> <p>Fostering financial inclusion - Its ambition is to ensure inclusive and effective access to products and services for priority groups, striving to leave no one behind on the journey to financial health.</p> <ul style="list-style-type: none">•The Group's Vulnerable Customer Unit (VCU) provided enhanced support to colleagues dealing with over 7,000 customers in vulnerable circumstances in 2024. It is fundamental to promoting financial inclusion amongst prioritised groups and provides enhanced expert banking support to customers in vulnerable circumstances or situations;•The Group worked with the Irish Alzheimer's Society to build training and education programmes which were launched in November 2024, so customer facing colleagues can become 'Dementia Friendly' trained by Q1 2025;•The Group engaged with industry bodies such as the Banking and Payments Federation of Ireland and the Irish Banking Culture Board to ensure prioritised and marginalised groups have equal and effective access to financial products;•A dedicated programme was mobilised to deliver compliance with the European Accessibility Act in 2025, supported by external advisors who are guiding the Group on accessibility standards and how to ensure the Group can offer choice and assisted support across all the Group's customer channels; and•Also in 2024, Bank of Ireland UK onboarded SignVideo to provide sign language interpretation services to customers. <p>Improving Financial Literacy - Its ambition is to empower people with the knowledge and skills to help improve their financial literacy and capability which are key building blocks on the journey to financial health.</p> <p>The Group has partnered with two charities, facilitated by Community Foundation Ireland, whereby the Group will provide funding to develop a pilot financial resilience programme to demonstrate the feasibility of financial education to positively impact the financial lives of marginalised women. This commitment has been approved and funded and will be delivered in 2025, with ambition to scale based on demonstrable impact.</p> <ul style="list-style-type: none">• In 2024, the total number of adults (customers, colleagues and the wider community) supported through financial education initiatives was just over 28,000 attendees. The talks covered topics including saving, budgeting, borrowing, cost of living, mortgages, pensions and fraud awareness; and• In the 2023/24 school year more than 13,000 primary and almost 92,000 secondary school students participated in Bank of Ireland's financial literacy programmes. Engagement in both programmes continues to increase year on year. <p>Building a more financially resilient and confident Ireland – Its ambition is to increase the number of customers and colleagues who have the resilience to withstand the financial impact of an unexpected day-to-day expense or a major life event. The Group has targets in the area of financial resilience under the UNPRB (United Nations Principles for Responsible Banking) Commitment to Financial Health and Inclusion and are a key component of the Group's Financial Wellbeing Ambition. The Group has committed to the following targets, which apply to all personal customers in RoI:</p> <ul style="list-style-type: none">• increase from 62% (April 2023) to 70% the percentage of customers who are confident (strongly or somewhat) that they have funds available to cover an unexpected day-today expense by 2030. At the end of 2024 this figure was 60% (-2% vs April 2023 baseline) among people who identified Bank of Ireland as their main day-to-day bank; and• increase from 44% (April 2023) to 50% the percentage of customers who are confident (strongly or somewhat) that they have funds (savings or insurance) available to cover a major unexpected event by 2030. At the end of 2024 this figure was 47% (+3% vs April 2023 baseline) among people who identified Bank of Ireland as their main day-to-day bank. <p>During H1 2025 to enhance accessibility, the Group has introduced a range of service improvements including video sign language interpretation and a text relay service which allows real-time translation of text into voice and vice versa. The Group also introduced voluntary blocks on debit cards for customers who want to stop transacting with gambling operators. All of these initiatives are designed to help customers take positive steps to improve control over their finances.</p> <p>Fraud Prevention: In 2024, the Group announced an investment of €50 million on customer fraud prevention and protection. The investment includes €15 million for new fraud prevention technology, along with a range of high-profile consumer awareness campaigns and support for customers who are targeted by fraudsters. Attempted fraud by criminals against its customers decreased by c.30% in H1 2025 compared to H2 2024, reflecting a strong control environment.</p> <p>Colleague Wellbeing Inclusion and Diversity</p> <ul style="list-style-type: none">• As part of its commitment to transparency around Inclusion and Diversity (I&D) at Bank of Ireland, the Group has voluntarily published a Gender Pay Gap figure since 2020. Gender imbalance at senior levels is a significant contributor to the gender pay gap at Bank of Ireland. With the introduction of CSRD, the Group have reported a consolidated Group gender pay gap figure for 2024 of 26%. The gender pay gap shows the Group has proportionately more female colleagues in junior roles and proportionately fewer female colleagues in senior roles. For this reason, in 2018 Bank of Ireland announced a target to establish 50:50 gender balance in appointments to senior management and leadership. The Group saw 48% female leadership appointments in 2024 (46% in 2023) with an ongoing commitment to achieve a 50:50 ratio.• In 2024, the Group was included in the Top 100 Europe's Diversity Leaders List, published by the Financial Times. The report ranked organisations' approaches to diversity, equity and inclusion, with surveys from over 100,000 employees across the continent making up 70% of the data collected.• The Group has an 'Inclusion Passport' which helps remove barriers employees may face in the workplace due to their personal circumstances, including health conditions, disabilities and caring responsibilities, among others. The Inclusion Passport is a record of workplace accommodations agreed between employees and people managers. <p>Neuroinclusion strategy - In 2024, a key development for the Group was the roll out of its Neuroinclusion strategy advancing its understanding, enhancing its infrastructure and creating a culture that supports neurodivergent colleagues and candidates. This strategy includes a suite of policies and process improvements to support neurodivergent colleagues with the aim of becoming one of the most neuroinclusive companies on the island of Ireland.</p> <p>Family Matters - In 2024, the Group enhanced its existing maternity leave policy to include a new provision enabling women who are undergoing treatment for cancer or other serious illness to postpone commencement of their maternity leave. In the absence of surrogacy leave legislation, this provision also applies to employees on surrogacy leave, as the Group's surrogacy offering mirrors maternity leave entitlements. This is an extension to the launch in 2023 of Family Matters, a suite of employee benefits and existing policy enhancements intended to create a more supportive and inclusive environment for colleagues.</p> <p>Wellbeing - The colleague wellbeing proposition includes building wellbeing engagement and connection; mental health supports; helping to connect across hybrid and remote workers; and supporting colleagues in managing wider life-related stress e.g. cost of living, etc. The Group is committed to fostering inclusion and diversity, promoting and creating equal opportunities and creating a workforce representative of society. This ambition is supported through inclusive recruitment and hiring manager training, training supports and seven colleague led I&D networks.</p> <p>Culture Embedding and Engagement - The Group's Culture Embedding Index was strong in 2024, and at 80% continued to exceed the Global Financial Services Benchmark. The Colleague Engagement Index, at 75%, was up 2 points when compared with 2023 and was the highest level ever achieved.</p> <p>Future Ready Workforce</p> <ul style="list-style-type: none">• The Group's Emerging Careers programmes provides access to work for individuals from diverse backgrounds focusing on five key areas - Ethnicity, Accessibility, Gender, Socio Economic and Future Skills with activity under each one contributing to the skills profile of the Group. In 2024, the Group continued to partner with external bodies such as auction and the DCU Access to the Workplace programme, in addition to commencing a pilot internship with the African Professional Network of Ireland.• In 2024, the Group strengthened hybrid supports on the back of colleague feedback, delivering an updated colleague handbook, and a guide for people managers, as well as curated people manager training in managing hybrid teams. the Group continue to invest and strengthen the hybrid working hub network and to align its hybrid and property strategies as the Group go forward.

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<p>Foundational: In terms of its foundational activities, the Group has made the following progress during 2024:</p> <p>•Community investment: the Group recognises its role in supporting the local communities where its customers live and work, and it is an important part of its sustainable business activity. The Group focuses on providing financial support to local not-for-profit and community groups, and social enterprises who are working to address social issues and make a lasting change in their communities.</p> <p>•Begin Together: In 2024, the Group provided support to a range of local initiatives aiming to foster inclusion and build capability amongst underserved groups across the island of Ireland. Its Community Fund provided €500,000 in strategic grants to 24 organisations with grant levels ranging from €10,000 to €80,000, and for the first time included four two-year grants. The introduction of multi-year grants was in direct response to the needs of the sector and will enable organisations to undertake far more complex and challenging projects. The Group focuses on helping the most marginalised in society who are typically most impacted by the challenges in our society. Projects focus on groups such as families and individuals living in or at risk of poverty, older people, people with disabilities, migrants and refugees, the Travelling community and more.</p> <p>Housing: As in many other countries, housing is the most pressing economic and social issue in Ireland right now. During H125, the Group announced that it was increasing its target for homebuilding, with an updated ambition to support the construction of 30,000 homes across Ireland through debt and equity financing. In June 2025, Bank of Ireland was supporting the construction of 24,500 homes, across all housing types, on 235 sites in Ireland. Building on last year’s substantial and broad Irish Government Housing Commission Report, the Group also convened a panel of key housing market stakeholders – drawn from homebuilders, equity investors, representative bodies and professional services – to consider ways in which the private sector can further increase housing supply responsibly. Recommendations from this panel are expected to be published by the Group later this year.</p> <p>•Social Housing: In support of the social need in Ireland and its UN PRB objectives, in February 2024 the Group announced it is increasing available funding for housing development to €2.5 billion by 2026. This announcement represented a 40% increase in funding available for home building. As part of this package, available funding for social and affordable housing more than doubled from the previous value of the fund from €400 million to €1 billion.</p> <p>•First Home Scheme: Bank of Ireland joined the First Home Scheme in 2022, a joint venture between the Irish State and the Irish retail banking sector to bridge the affordability gap between the price of a new home versus a customer’s deposit and mortgage. The Group is a leading participant in the scheme, and as of December 2024 had accounted for c.45% of approvals and drawdowns since the scheme’s inception in July 2022. The total capacity of the scheme was extended in 2024 by €280 million to €680 million, which included a further capital investment by the Group. This additional capacity will allow the scheme to continue to support first time buyers.</p> <p>•Financial crime: Protecting the integrity of the financial system from financial crime risks including money laundering, terrorist financing, bribery and corruption is of paramount importance to us. The Group is committed to playing its part in safeguarding the financial systems and its customers from the impact of financial crime. The Group’s financial crime framework, including its policies and procedures support this objective. All colleagues complete mandatory training and assessments annually, so that the Group’s policies and procedures are embedded in operational activities.</p> <p>Through the work of its Financial Crime Compliance team, the Group also continued its significant involvement with the Infinitech Project which began in 2022 as a collaboration between various organisations, including the European Union, IBM, University of Galway, Stop the Traffik and Bank of Ireland. The scope of the project is to leverage AI technologies and ‘big data’ to help identify human trafficking typologies, which might be present in large data sets, for the purpose of providing more accurate and useful intelligence for financial crime investigation teams. During 2024, the model that had been developed over the previous two years was initiated within the Group’s IT architecture to allow for a ‘proof of concept’ phase to be completed. This was successfully achieved by Q4 2024, with multiple typologies used to identify various accounts that its subject matter experts in the financial crime function found suspicious, including accounts that had been previously reported to the statutory authorities on suspicion of being linked to modern slavery / human trafficking activity. The project is now progressing to a fully embedded process which will significantly enhance the Group’s capabilities in detecting and disrupting human trafficking activity.</p> <p>•Sourcing responsibly: It is important that its supply partners who deliver goods and services to the Group, share its values and ambition to create a sustainable future. For this reason, the Group continues to review and update its Code of Supplier Responsibility which sets out the responsible business practices the Group expects of all its suppliers. This Code is further supported by its Group Procurement, Group Third Party, Group Human Rights and Group Environmental policies.</p> <p>•Human rights: Several policies and initiatives, including its Code of Supplier Responsibility, Modern Slavery Statement and Vulnerable Customer Unit, guide its approach to ensure that modern slavery and human trafficking does not affect its business or its supply chain. In December 2024, the Group’s first Human Rights policy was approved by the Board. The purpose of this policy is to provide information about the Group’s commitments and efforts to respect human rights in all its business activities and relationships. The policy describes the governance structure and related policies supporting the commitments. The Group is committed to upholding and promoting human rights in all areas of its operations. Bank of Ireland continued its ongoing commitment in the area of combatting human trafficking in 2024 via the use of innovative technology and the provision of specialised training to its colleagues.</p> <p>•Cyber security: the Group continues to invest in its cyber capability across people, process and technology. The ‘Security Zone’ page on its website supports customer security awareness, including fraud alerts and information on how to report suspicious online activity, emails or phone calls. The Group Operational Risk Information Security and Cyber Risk policy establishes the Group-wide approach to Cyber Risk management and details the risk mitigating requirements for the Cyber Risk sub risk types, such as security design risk and confidentiality risk. These provide the foundations that the business should have in place to meet the objectives of operating within risk appetite. The policy is based on applicable legislation, regulation rules, and best practice guidance including, but not limited to: Central Bank of Ireland, European Banking Authority, Prudential Regulatory Authority and Financial Conduct Authority (FCA) Guidelines and Rulebooks.</p> <p>•Data Protection: Its customers, clients and colleagues trust us with their data, including giving them the control they need while being fully committed to keeping their information private. Its Data Privacy Notices explain how the Group hold and use personal information and outline people’s rights in relation to the collection of personal information. The Group Data Privacy policy outlines the Group’s commitment to ensuring that the privacy rights of all data subjects for whom it processes personal data are upheld. It provides the Group with the foundations and organisational structure for ensuring compliance with legislative data protection and privacy obligations. It sets out the Group’s approach to protecting personal data, taking account of the data protection and privacy principles and requirements that must be followed, and defines the standards for effective management of data protection and privacy related risks. The policy outlines the following mitigation requirements which serve to facilitate the Group’s efforts in pursuit of this opportunity:</p> <ul style="list-style-type: none">• Data protection and privacy is incorporated into the Group’s business activities, by design and by default;• Data subjects can exercise their privacy rights regarding personal data processing;• Data protection events including personal data breaches are appropriately managed and reported;• Legal and regulatory requirements are met before personal data is transferred to a third party and / or another jurisdiction; and• External engagement on matters of data protection and privacy are managed effectively and in an appropriate and timely manner. <p>The Group further empowers colleagues through dedicated training and awareness programmes such as mandatory annual training on data protection and privacy applicable Group-wide.</p> <p>Further detail on the initiatives delivered under these strategic pillars and foundations is available on pages 14 to 17,19, 20, 21, 112, 116, 117, 123, 124, 127 and 129 of the 2024 Group Annual Report.</p> <p>Business environment & model</p> <p>The Group has been progressively aligning its business model to address social factors and risks informed by the UNPRB across areas including Financial Wellbeing, digitalisation, customer service, credit and supplier agreements.</p> <p>The Group is a signatory to the following UN frameworks: the UNPRB, the UN Principles for Responsible Investment (UNPRI) and the UNPPRB ‘Commitment to Financial Health and Inclusion’. The Bank’s Financial Health and Inclusion targets were submitted to the UNEP FI in June 2023 and were published by the UNEP FI in July 2023. Details of these targets and progress in 2024 are included in the Group’s answer to (a) above. These initiatives support and complement the ambitions set out in its Group Sustainability Strategy.</p> <p>The Group offers a wide range of digital banking services through the mobile app, as well as local counter services through a network of 181 branches across the island of Ireland. This is complemented by access to local counter services in c.900 post office locations through a partnership with An Post, the Irish postal service.</p> <p>The Group’s digital banking offering is core to its purpose - Helping customers, colleagues, shareholders and society to thrive. The Enterprise Digital Strategy is the strategic framework for driving enterprise-wide digital transformation across the Group. The strategic objectives for Digital align with the Group Strategic Pillars of Stronger Relationships, Simpler Business and Sustainable Company. The Strategy is positioned as an ‘Enabler’ to the overall Group Strategy, recognising the importance of digital transformation to deliver the Group’s strategic priorities and support business units. Underpinned by the Enterprise Digital strategy, in 2024 the Group made and pledged several investments to improve a number of services and IT systems, such as:</p> <ul style="list-style-type: none">•transformation of contact centre technologies and improved digital customer relationship management;•simplification onto strategic platforms for Finance, Payments, Corporate and Markets and Fraud;•digitisation of commercial lending to create a seamless digital experience for commercial customers; and•deliver digital, analytics and customer insights to support tailored wealth management, retirement planning and insurance propositions to the Irish market. <p>Putting customers first is a core value and integral to its purpose of helping customers thrive. In H1 2025 the Group has continued progress enhancing customer service and brand loyalty, with increases in both the Customer Effort Score (+61, up 4 on H1 2024) and Personal Relationship Net Promoter Score (RNPS) (+31, up 10 on H1 2024). Customer complaints in Ireland continue to trend downwards (down 24% on H1 2024) with H1 2025 at record low levels.</p> <p>The Group has a Code of Supplier Responsibility which outlines its expectations of its suppliers across human rights, health and safety, supply chain, inclusion and diversity, business integrity, doing business responsibly and environmental and energy management. The Group ensures suppliers’ compliance with its Code through the Financial Supplier Qualification System (FSQS) process.</p> <p>The Group indicates its consideration for social factors and risks as it has the following policies in place such as the Modern Slavery and Human Trafficking statement; Code of Supplier Responsibility; Group Human Rights policy; the vulnerability requirements of the Group Customer Protection Risk policy; Group Procurement policy; Group Data Privacy policy; Board Diversity policy; Group Code of Conduct; Inclusion and Diversity policy; and Group Health and Safety policy.</p> <p>The Group’s Modern Slavery and Human Trafficking statement is approved by the Group Sustainability Committee, a sub-committee of the Group’s Board.</p> <p>The Group has published its Sustainability Exclusion List which sets out its risk appetite for lending to potentially sensitive sectors which the Group believes causes environmental and/or social harm to society and the community. The Group has integrated this List into its processes as part of its Corporate and Credit ESG Risk Lending Procedure as it has aligned its Screening Criteria to its Sustainability Exclusion List.</p>
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	<p>Financial planning</p> <p>The Group's strategic objectives to mitigate social risk as set out above are embedded in the Group's strategic and financial planning ICAAP process, through the following ongoing investments.</p> <ul style="list-style-type: none">•CapEx investment and OpEx funding in the initiatives set out in this section across Financial Wellbeing, Colleague Wellbeing and Foundational topics. This includes investment of €50 million on customer fraud prevention and protection.•Increasing the available funding for social and affordable housing from €400 million currently to €1 billion to meet the increasing social need•Supporting the extension of the total capacity of the First Home Scheme in 2024 by €280 million to €680 million, which included a further capital investment by the Group.
(b)	<p>Objectives, targets and limits to assess and address social risk in short-term, medium-term and long-term, and performance assessment against these objectives, targets and limits, including forward-looking information in the design of business strategy and processes</p> <p>The Group's Sustainability Strategy includes a number of target outcomes across social topics, in particular within the 'Enhancing Financial Wellbeing', 'Enabling Colleagues to Thrive' and Foundation pillars. These strategic pillars align to a number of Sustainable Development Goals: Quality Education, Gender Equality, Decent work & economic growth, Reduced inequalities and No Poverty.</p> <p>The Group disclosed a number of metrics in the Group's 2024 CSRD disclosures in the Group Annual Report 2024 (see ESRS S1, S3 and S4 disclosures, and entity specific topic, Housing disclosures), which demonstrate the progress made against its strategic objectives and targets across these areas.</p> <p>The Group has continued to target 50:50 gender balance across all senior management appointments, with a 45-55% ratio to be achieved by the end of 2025. The Group achieved a 48% female senior leadership appointments ratio in 2024.</p> <p>The Group, as a founding signatory of the UNPRB 'Commitment to Financial Health and Inclusion', is committed to promoting financial health and inclusion through its products, services and customer engagement. In July 2023, the UN published the commitments made by a small number of banks globally (including Bank of Ireland) to support universal financial inclusion and a banking sector that supports its customers' financial health. The Group's UNPRB commitment focuses on supporting its customers' day-to-day and life event financial resilience. The Group's goal is to contribute to the creation of a more financially resilient and confident Ireland by increasing the number of customers who have the resilience to withstand the financial impact of an unexpected day-to-day expense and/or a major life event by:</p> <ul style="list-style-type: none">• Increasing from 62% (April 2023) to 70% the percentage of customers who are confident (strongly or somewhat) that they have funds available to cover an unexpected day-to-day expense by 2030. At the end of 2024, this figure was 60% (-2% vs April 2023 baseline) among people who identified Bank of Ireland as their main day-to-day bank.• Increasing from 44% (April 2023) to 50% the percentage of customers who are confident (strongly or somewhat) that they have funds (Savings or Insurance) available to cover a major unexpected event by 2030. At the end of 2024 this figure was 47% (+3% vs April 2023 baseline) among people who identified Bank of Ireland as their main day-to-day bank. <p>Through partnerships, the Group targets to support the financial wellbeing of the communities in which it operates / prioritised groups. The base value for this target as of April 2023 is zero partnerships, with a target of two partnerships by December 2025. The target of two partnerships was set as a test and learn concept as the Group works towards its UNPRB Commitments. The outcome of these partnerships will be used to inform the Group's short to medium term plans to continue with the progression towards meeting the UNPRB targets. This target applies to RoI only. The Group has achieved the target of two partnerships, partnering with two charities, facilitated by the Community Foundation Ireland, see previous section for more detail. The progress against these targets is monitored and reported to the Group Sustainability Committee (GSC) on a quarterly basis.</p> <p>These impact targets address a priority in Ireland in line with:</p> <ul style="list-style-type: none">• Ireland's National Implementation Plan for the Sustainable Development Goals 2022–24• Adult Literacy for Life Strategy• Education for Sustainable Development—National Strategy• The Financial Wellbeing of adults in Ireland• The Financial Literacy of adults in Ireland• The Financial Resilience of adults in Ireland <p>To monitor progress towards achieving its targets, the Bank will periodically track the following:</p> <ul style="list-style-type: none">• Number of adults supported through financial education initiatives (just over 28,000 in 2024)• Based on survey data the percentage of customers who state that they have a long term (greater than 12 months) savings and or investment plan in place, starting from a baseline value of 35% in 2023• Based on survey data, the percentage of customers who state that they always have some money put aside to cover day-to-day unexpected expenses, starting from a baseline value of 60% in 2023• Number of active partnerships to achieve financial health targets, starting from a baseline value of zero in 2023 <p>Please see response to (a) above for further detail on the Group's objectives with respect to social housing and the First Home Scheme.</p>
(c)	<p>Policies and procedures relating to direct and indirect engagement with new or existing counterparties on their strategies to mitigate and reduce socially harmful activities</p> <p>The Group examines ESG considerations as part of its customer onboarding due-diligence process and for lending, ESG considerations are outlined in the Corporate and Commercial Banking ESG Lending Procedures. The Group requires credit submissions to explicitly comment on a borrower's ESG policies, how it is incorporated into its strategic objectives and whether these are measured and evidenced.</p> <p>The Group's Sustainability Exclusion List clearly sets out its risk appetite for lending to potentially sensitive sectors which the Group believes cause both environmental and/ or social harm to society and its communities. This list applies to all new lending and existing customers ensuring that the Group does not provide new financing to customers who are deemed to engage in a defined list of excluded business activities. This list includes companies who have operations in internationally protected conservation areas, those which have been subject to major or sustained environmental or socially related campaigns against them, companies which have been found to abuse human rights and those companies which have incurred a major environmental or social incident or fine. Any cases considered a heightened ESG risk during initial review will be subject to 'Enhanced Review' and will be considered by Corporate and Commercial Banking's ESG Risk Credit Forum prior to credit review. For further details on this process and its governance arrangements, please refer to the Group's disclosure in Governance Risk Template.</p> <p>Please see response to (a) above for further detail on the Group's engagement with respect to social housing and the First Home Scheme.</p>
Governance	
	<p>Responsibilities of the management body for setting the risk framework, supervising and managing the implementation of the objectives, strategy and policies in the context of social risk management covering counterparties' approaches to:</p> <p>(i) Activities towards the community and society (ii) Employee relationships and labour standards (iii) Customer protection and product responsibility (iv) Human rights</p> <p>Responsibilities of the management body</p> <p>The Group's Board provides oversight over the Group's alignment with key regulations, as well as the objectives under the Sustainability Strategy by engaging in communication with the Group Executive Committee (GEC), the BRC and the GSC on progress against key ESG commitments and delivery of the Sustainability Strategy, which includes social dimensions as indicated in the Group's answers to (a) and (b) above.</p> <p>At the report date, the Board comprises 11 Directors: two Executive Directors, the Chairman, who was independent on appointment, and eight independent Non-Executive Directors (NEDs). The biographical details of each of the Directors, along with each of their individual dates of appointment, are set out on the Group website. Page 192 of the Annual Report provides further details on the diversity of the Board and its Committees and on the Board members skills and experience. The Group Nomination & Governance Committee (N&G) undertakes a rigorous and transparent procedure when considering candidates for appointment to the Board and maintains oversight of the Board's composition to ensure it remains appropriate.</p> <p>On behalf of the Board, the GSC oversees the development and implementation of the Group's Sustainability Strategy and, together with the BRC, oversees related risk. In the context of social factors and risks this includes:</p> <ul style="list-style-type: none">- Oversee progress against ESG targets, the UNPRB Commitment to Financial Health & Inclusion, and other social related targets,- Monitor the execution of the Board approved Sustainability Strategy, via periodic updates across key dimensions of the strategy including financial wellbeing interventions social topics (diversity and inclusion activity and supply chain).- Review and challenge key sustainability policies of the Group, in the context of the Group's Sustainability Strategy, to ensure they are aligned to the Group's purpose and values and support the long term success of the Group. This includes approval, on an annual basis, of the Group Modern Slavery and Human Trafficking Statement and the Group Human Rights policy. <p>Please see its terms of reference for further details: https://www.bankofireland.com/app/uploads/assets/GSC-Terms-of-Reference-approved-16-Dec-2024.pdf</p>

	<p>The Board is fully committed to diversity in all forms and believes that diversity is an essential ingredient of sound decision-making. The Board's commitment to diversity is set out in the Board Diversity policy which, following review in 2024 led by N&G, has retained the following specific targets:</p> <ul style="list-style-type: none">• maintaining a minimum of 40% female representation on the Board. At the report date female representation on the Board is currently at 36% which falls below the target;• the inclusion of at least one Director that is from an ethnic minority. At the report date this target has been met; and• the appointment of a female to one of the four senior Board roles of CEO, CFO, Chairman and SID. At the report date this target has not yet been met. <p>The Group's Board level GSC receives ongoing updates on Financial Wellbeing and on UNPRB commitments. The GEC sponsor for Financial Wellbeing is the Chief Customer Officer.</p> <p>The Group's Begin Together Fund is delivered annually in partnership with third party experts in the Community Foundation for Ireland (CFI), which enables the Group to focus its community investment on a wide variety of causes within an overarching strategic framework, designed to enable inclusion and build capability among vulnerable groups.</p> <p>On an ongoing basis, through its risk management framework, policies and processes, the Group identifies and assesses risk to which the Group is exposed. The Group's risk management framework sets out the risk management, measurement, and reporting requirements for the Group's risks. The Group ESG risk management framework sets out the Group approach to ESG risk management. ESG factors represent a common risk driver across the Group's principal and sub risk types and are managed through each of the Group's principal and sub risk types. The Group applies a risk lens to ensure that the impact of ESG across the Group's risk types is considered on an ongoing basis and that the aggregate impact arising from ESG risk drivers is given appropriate consideration. While ESG risk management is managed through the Group's principal and sub risk types, the Group also has dedicated resources to lead the co-ordination of the Group's approach to ESG risk management, both in first line of defence (1LOD) (Sustainability Team, Group Strategy) and in second line of defence (2LOD) (Business, Strategic and ESG Risk Team, Group Risk).</p> <p>The Group defines ESG risk as the risk to the Group that ESG factors (environmental, social or governance matters) could cause a material negative impact on:</p> <ul style="list-style-type: none">• the Group's earnings, capital, franchise value, or reputation;• the Group's regulatory standing;• the long-term sustainability of its customers' operations and financial wellbeing; and• the communities and environment in which the Group and its customers operate. <p>Social and Governance risk is defined in the Group as the risk to the Group of any material negative impact from current or prospective impacts of social or governance risk factors including, actions by the Group or by the Group's supply chain, which could lead to a negative impact on the rights, well-being and interests of the Group and its customers, colleagues, and wider stakeholders. Social risks, including employee relationships and labour standards, customer protection and product responsibility and human rights are managed through the relevant Group's risk types (Credit Risk, Conduct Risk and Other Operational Risk).</p>
(d)	<p>Credit Risk:</p> <p>Regarding counterparty risk, the Group's Credit Risk policies and loan origination standards address social risk factors including customer and employee engagement and protections. For corporate and commercial customers, the Group examines social considerations as part of its customer onboarding due-diligence process. This process is also conducted on an annual basis for existing customers. The business activity of the company or project will be checked against the list of excluded activities across particularly sensitive sectors which are considered by the Group to cause social harm to society and its communities. If the company or project is involved in the excluded activities cannot be originated or renewed. Furthermore any cases considered a heightened ESG risk will be subject to enhanced review and consideration by Corporate and Commercial Banking's ESG Risk Credit Forum. Credit submissions and review papers are required to critically assess environmental risk factors and their impact on the financial condition of the borrowers and are addressed in the same context as any business risk or financial input. Please see Table 1 Section (d) for further details on the ESG Risk credit procedures.</p> <p>Conduct Risk</p> <ul style="list-style-type: none">•The Group has a Customer Protection Risk policy which highlights how customers are protected, covering topics of customer engagement, customer error and remediation, and customer complaints. The policy outlines the Product and Service Approval and Governance (PSAG) process which is a four stage control process incorporating different levels of independent review, challenge and approval for any in-scope product or service proposal.•The Group Code of Conduct covers those working in or for the Group and outlines its guiding values and principles. It applies to all employees directly employed by the Group and Independent NEDs. The Code includes an overview of what the Group stands for, the Group's values and purpose, what happens in instances where the Code is breached and how to keep the Group safe against unacceptable behaviour, including bribery and corruption. Employees must complete the Group Code of Conduct training each year as well as other assigned mandatory training.•The purpose of the Group's Speak Up policy is to detail how all workers can confidentially raise a concern about suspected or actual wrongdoing, without fear of penalisation. The Speak Up & Investigation unit (SUI) reports updates to the Audit Committee at least semi-annually on the number, categorisation and outcome of investigations, any thematic findings and trends which may impact the Group, and KPIs which allow for the monitoring and measurement of the Group's Speak Up arrangements. The Group Audit Committee is responsible for considering, reviewing and evaluating arrangements for dealing with Speak Up concerns arising from the implementation of the Group Speak Up policy.•The Group Data Privacy policy outlines the Group's commitment to ensuring that the privacy rights of all data subjects for whom it processes personal data are upheld. It provides the Group with the foundations and organisational structure for ensuring compliance with legislative data protection and privacy obligations. It sets out the Group's approach to protecting personal data, taking account of the data protection and privacy principles and requirements that must be followed, and defines the standards for effective management of data protection and privacy related risks. <p>Other Operational Risk</p> <ul style="list-style-type: none">•The Group Third Party Risk Management (TPRM) and Outsourcing policy details the minimum risk mitigating requirements relating to TPRM and Outsourcing risk to which the Group is exposed. The policy requires Group Procurement to establish and maintain a mandatory Onboarding Due Diligence Process for new outsourcing providers that is applied Group-wide. Criteria and/or factors to mitigate and measure ESG risk (including social risks) which may follow from the outsourcing to a supplier is considered as part of the due diligence.•Through its Human Rights policy the Group aims to ensure that its business operations do not infringe upon the human rights of its employees, customers, suppliers and communities. This policy applies to all employees, contractors, and workers in the value chain in the organisations that the Group use as suppliers. Stakeholders include suppliers' employees, sub-contractors and other third parties in their supply chain, business partners and stakeholders engaged in the Group's operations across all locations it operates in. It was also informed by relevant legal requirements, internationally agreed standards and external human rights experts.•The Code of Supplier Responsibility applies to all suppliers to the Group. It defines what the Group expects from them in terms of responsible business practice and behaviour, including prohibiting forced labour (slavery) and human trafficking in their supply chains, and to prohibit child labour with reference to the ILO definition. It applies together with the Group's Third-Party policy document and the Group's membership of the FSQS. The FSQS online portal is used by suppliers to submit information and compliance data about their organisation.
(e)	<p>Integration of measures to manage social factors and risks in internal governance arrangements, including the role of committees, the allocation of tasks and responsibilities, and the feedback loop from risk management to the management body</p> <p>The Group has a reporting line between the BRC, GSC and the Board covering ESG risks. The GSC and BRC receive quarterly updates related to ESG risks and the BRC/GSC holds a joint meeting on at least an annual basis and the Board is updated accordingly on ESG risks.</p> <p>The Board Risk Report (BRR) is used by the Board to review and monitor the Group's risk profile across all Principal Risks, compliance with risk appetite and risk policies. ESG risk in the Group and ESG risk appetite metrics are reported through the BRR which is the primary source of reporting for the impact of ESG-related risks on the Group's risk profile. The Board receives monthly updates via the BRR, including social risk related Management Reporting Metrics. In 2024, the Board approved a risk appetite statement and risk appetite metrics for ESG risk, including a measure related to environmental and social risks.</p> <p>The Group ESG risk management framework sets out the Group approach to ESG risk management and is reviewed and approved by the ERC on a minimum annual basis. 1LOD has the primary responsibility for managing the risk generated by their actions and this includes managing ESG factors. 2LOD has responsibility for ensuring the ESG risk factors are considered when executing second line responsibilities as set out in the Group risk management framework. While ESG risk management is managed through the Group's principal and sub risk types, the Group also has dedicated resources to lead the co-ordination of the Group's approach to ESG risk management, both in 1LOD (Sustainability Team, Group Strategy) and in 2LOD (Business, Strategic and ESG Risk Team, Group Risk).</p> <p>For information on the Group's risk committees and their tasks and responsibilities for monitoring and managing ESG risks, please refer to the Group's answer to (d) above.</p>
(f)	<p>Lines of reporting and frequency of reporting relating to social risk</p> <p>The BRR is used by the Board to review and monitor the Group's risk profile across all principal risks, compliance with risk appetite and risk policies. ESG risk in the Group is reported through the BRR and is the primary source of reporting for the impact of ESG-related risks on the Group's risk profile. The Board receives monthly updates via the BRR, including ESG related risk appetite metrics and social risk related Management Reporting Metrics. In 2024, the Board approved a risk appetite statement and risk appetite metrics for ESG risk, including a measure related to environmental and social risks.</p> <p>The Group's Sustainability Board Committee receives quarterly updates on ESG, which includes progress against the social aspects of the Sustainability Strategy under the pillars of 'Enabling colleagues to thrive', 'Enhancing financial wellbeing' and the 'Foundations'. See response to (a) above for further detail.</p>
(g)	<p>Alignment of the remuneration policy in line with institution's social risk-related objectives</p> <p>As announced in the Group's strategy refresh in March 2023, 'Sustainable Company' is now one of the core strategic pillars of the Group, of which supporting wider society is a key focus area. With 'Sustainable Company' now a core strategic pillar, ESG is mainstreamed into the Group's performance management system.</p> <p>In 2023, the Group introduced a performance-related Profit Share Scheme which sees colleagues rewarded based on both the financial and operating performance of the company and individual performance. The appropriateness of the annual profit share is assessed against a mix of financial and non-financial criteria, including profit and related metrics, affordability, customer, and ESG, with the pool as a whole subject to risk adjustment. Environmental criteria include progress on its Green Transition strategic targets.</p> <p>In making the assessment for 2024 the Group Remuneration Committee took into consideration social factors on customer and employee engagement.</p>

Risk management	
	<p>Definitions, methodologies and international standards on which the social risk management framework is based</p> <p>The management of Social Risks in Bank of Ireland</p> <p>The Group defines ESG risk as the risk to the Group that ESG factors (environmental, social or governance matters) could cause a material negative impact on:</p> <ul style="list-style-type: none">• the Group's earnings, capital, franchise value, or reputation;• the Group's regulatory standing;• the long-term sustainability of its customer's operations and financial wellbeing; and• the communities and environment in which the Group and its customers operate. <p>Social and Governance risk is defined in the Group as the risk to the Group of any material negative impact from current or prospective impacts of social or governance risk factors including, actions by the Group or by the Group's supply chain, which could lead to a negative impact on the rights, well-being and interests of the Group and its customers, colleagues, and wider stakeholders.</p> <p>The Group's risk management framework sets out the risk management, measurement, and reporting requirements for the Group's risks. The Group ESG risk management framework sets out the Group approach to ESG risk management.</p> <p>ESG factors represent a common driver across the Group's principal and sub risk types. The Group applies a risk lens to ensure that the impact of ESG across the Group's risk types is considered on an ongoing basis and that the aggregate impact arising from ESG risk drivers is given appropriate consideration. 1LOD has the primary responsibility for managing the risk generated by their actions and this includes managing ESG factors. 2LOD has responsibility for ensuring the ESG risk factors are considered when executing second line responsibilities as set out in the Group risk management framework. While ESG risk management is managed through the Group's principal and sub risk types, the Group also has dedicated resources to lead the co-ordination of the Group's approach to ESG risk management, both in 1LOD (Sustainability Team, Group Strategy) and in 2LOD (Business, Strategic and ESG Risk Team, Group Risk).</p> <p>As outlined in (a), the Group leverages the UNPRB, UNPRI and the UNPRB 'Commitment to Financial Health and Inclusion', to help determine relevant ESG factors.</p>
(h)	<p>Human Rights</p> <p>The Group does not operate within any countries or geographic areas that are at significant risk of incidents of forced labour, compulsory labour or child labour. Along with the Group's compliance with all applicable local labour laws and regulations for the areas in which it operates, the Group does not recognise any operations to be at significant risk of incidents of forced labour or child labour. The Group operates in an industry where regulation protects workers against such severe human rights violations. The Group is committed to upholding and promoting Human Rights in all areas of its operations. The Group's Human Rights policy was approved by the Board in December 2024. This policy draws on the Group's commitment to respecting and promoting Human Rights in accordance with the highest international standards, including the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, OECD guides for Multinational Enterprises, CSRD and International Labor Organisation's Declaration on Fundamental Principles and Rights at Work. This policy also aligns with its commitments under, UNPRB, UNPRI and UNPRB 'Commitment to Financial Health and Inclusion'. The policy is publicly available on the Group's website: Investor Resources - Bank of Ireland.</p> <p>The Group's Modern Slavery and Human Trafficking Statement communicates the Group's commitment to improving practices to combat modern slavery, human trafficking and forced or compulsory labour, as defined in the Modern Slavery Act 2015. While the Group recognises human rights risks associated with modern slavery, the Modern Slavery and Human Trafficking Statement 2024 outlines the Group's actions to prevent human rights abuses, and this is reflected in its commitments under the UNPRB and the UNPRI.</p> <p>Code of Conduct</p> <p>The Group Code of Conduct covers those working in or for the Group and applies to all employees directly employed by the Group and Independent NEDs. Reviewed annually and approved by the Board, the Code defines the Group's guiding values and principles in accordance with:</p> <ul style="list-style-type: none">• The Central Bank of Ireland (CBI) Common Conduct Standards;• UK Prudential Regulation Authority (PRA) and Financial Conduct Authority (FCA) Individual Conduct Rules; and• where applicable CBI Additional Conduct Standards, CBI Fitness and Probity (F&P), the Individual Accountability framework (IAF) or the Senior Managers and Certification Regime (SMCR). <p>Code of Supplier Responsibility</p> <p>The Code of Supplier Responsibility applies to all suppliers to the Group and defines what the Group expects from them in terms of responsible business practice and behaviour, including prohibiting forced labour (slavery) and human trafficking in their supply chains, and to prohibit child labour. It applies together with the Group's Third-Party policy document and the Group's membership of the Financial Supplier Qualification System (FSQS). The FSQS online portal is used by suppliers to submit information and compliance data about their organisation. The code references relevant social legislation, standards, guidance, and regulations including:</p> <ul style="list-style-type: none">• UK Modern Slavery Act,• The Disability Act 2005 (Ireland), Equality Act 2010 (UK) and the European Accessibility Act 2019 (effective 28th June 2025).• ISO 45001, the internationally recognised Occupational Health and Safety Management Standard. <p>The Code is publicly available on the Group's website: Investor Resources - Bank of Ireland.</p>
(i)	<p>Processes to identify, measure and monitor activities and exposures (and collateral where applicable) sensitive to social risk, covering relevant transmission channels</p> <p>The Group ESG risk management framework sets out the approach to the management of ESG risk factors in the Group. ESG risk management is relatively immature across industry and continues to evolve. Implementation to date, in the Group and industry, has largely focused on climate-related risk and other environmental (non-climate) risk drivers with regulatory expectations set out in the ECB Guide on Climate-related and Environmental Risks (November 2020). In 2024, the management of ESG risk in the Group continued to develop and expand. The Group has leveraged the requirements of the EU CSRD to expand disclosures in relation to the identification and management of ESG risks. In FY24, a Double Materiality Assessment, using the double materiality concept was conducted across ESG (including social) topics.</p> <p>ESG factors (including social factors) represent a common driver across the Group's principal and sub risk types. The Group addresses social risk factors through the risk policies attached to the relevant principal and sub risks including Conduct Risk, Operational Risk (including Third Party Risk Management & Outsourcing), Business and Strategic Risk, Regulatory Risk and Credit Risk. The Group also uses the definitions set out in the Principles for Responsible Investment (PRI) reporting framework as a guide when considering social risk factors. Through the Group's Sustainability Exclusion List, the Group has aligned its lending strategy to minimise its exposures to environmentally and socially high-risk sectors.</p>
(j)	<p>Activities, commitments and assets contributing to mitigate social risk</p> <p>Please refer to the Group's answer to (d) above with respect to the processes in place to mitigate social risks through the Group's ESG risk management framework.</p> <p>Please refer to the Group's answer to (a) - (b) above, for the Group's objectives regarding social factors such as the Financial Wellbeing Programme (FWP) including:</p> <ul style="list-style-type: none">- Special assistance for vulnerable customers;- Enhancing learning and development opportunities for customers and colleagues; and- The Group's commitment to achieving 50:50 gender ratio within its management and leadership. <p>As noted in the Group's answer to (d) above, the Group's Begin Together Fund is delivered annually in partnership with third party experts in the Community Foundation for Ireland (CFI), which enables the Group to focus its community investment on a wide variety of causes within an overarching strategic framework.</p>
(k)	<p>Implementation of tools for identification and management of social risk</p> <p>The Group has aligned its lending strategy to minimise its exposures to environmentally and socially high-risk sectors through the Group's Sustainability Exclusion List and through the requirement to address E, S and G risks as part of individual credit applications (Corporate & Commercial Banking).</p> <p>Furthermore the Group has leveraged behavioural science and digital tools to deliver its financial wellbeing behavioural campaigns. Behavioural science helps us understand why and how people make financial decisions and what works well. To support this work the Group continue to collaborate with behavioural science experts to bring best in class expertise to support customers' decision making and promote positive behaviours to support customers financial wellbeing. The Group is continuing its partnership with Harvard's Sustainability, Transparency, and Accountability Research (STAR) Lab.</p> <p>In 2022 the Group launched Money Insights 365 (Mi365), an in-app money management tool that delivers personalised insights and tailored nudges to enable customers to understand and manage day-to-day spending, stay in control of their finances, and enhance their financial wellbeing. It was launched to all mobile app users with 47 insights across a number of categories ranging from subscriptions to cash-flow tracking.</p> <p>In terms of managing Financial Crime the Infinitch Project to help identify human trafficking typologies for financial crime investigation teams is now progressing to a fully embedded process which will significantly enhance the Group's capabilities in detecting and disrupting human trafficking activity.</p> <p>The Group has a Code of Supplier Responsibility which outlines its expectations of its suppliers across human rights, health and safety, supply chain, inclusion and diversity, business integrity, doing business responsibly and environmental and energy management. The Group ensures suppliers' compliance with its Code through the Financial Supplier Qualification System (FSQS) process.</p>

<div>(l)</div>	<div>Description of setting limits to social risk and cases to trigger escalation and exclusion in the case of breaching these limits</div> <div><p>The Group has published a Sustainability Exclusion List that sets out the Group's risk appetite for lending to potential environmentally and socially sensitive sectors which it believes causes environmental and / or social harm to society and communities. This List applies to new lending and existing corporate and commercial customers ensuring that the Group does not provide new financing to customers who are deemed to engage in a defined list of excluded business activities (including specified activities within sectors such as Oil, Gas & Coal, Power & Energy, Mining, Defence and Adult Entertainment). Also, ESG risk factors are used to screen for heightened ESG risk. If there is recent evidence in the public domain of direct involvement in a defined list of issues the transaction is subject to an enhanced review. This list includes companies who have operations in internationally protected conservation areas, those which have been subject to major or sustained environmental or socially related campaigns against them, companies which have been found to abuse human rights and those companies which have incurred a major environmental or social incident or fine. Transactions may also be considered as having a heightened ESG risk during initial review which will result in additional formal review by relevant risk forums and committees. This may be due, for example, to material or repeat noncompliance of environmental and social laws or a lack of adequate policies and procedures for managing ESG risks. Any cases considered a heightened ESG risk during initial review will be subject to 'Enhanced Review' and will be considered by Corporate and Commercial Banking's ESG Risk Credit Forum in addition to Corporate & Commercial Credit. The Group embeds these exclusions at the origination stage to ensure that these criteria continue to evolve in line with the Group's Sustainability Strategy.</p><p>The Group has aligned its Screening Criteria to its Sustainability Exclusion List. For further details on this process and its governance arrangements, please refer to the Group's disclosure in Governance Risk Template.</p><p>The BRR is used by the Board to review and monitor the Group's risk profile across all principal risks, compliance with risk appetite and risk policies. ESG risk in the Group is reported through the BRR and is the primary source of reporting for the impact of ESG-related risks on the Group's risk profile. The Board receives monthly updates via the BRR, including social risk related Management Reporting Metrics. In 2024, the Board approved a risk appetite statement for ESG risk and ESG risk appetite metrics, including a measure related to environmental and social risks.</p><p>Key policies and statements addressing social risk factors include:</p><ul style="list-style-type: none">• Group Code of Conduct• Speak Up policy• Group Customer Protection Risk policy• Group Social and Financial Inclusion policy• Respect at Work policy• Group Recruitment policy• Corporate Affairs Statement• Group Financial Crime policy• Group Financial Crime Compliance statement• Modern Slavery and Human Trafficking statement• Human Rights policy• Group Third Party Risk Management and Outsourcing policy• Code of Supplier Responsibility• Group Procurement policy• Group Inclusion and Diversity policy• Group Health and Safety policy• Group Data Privacy Risk policy• Group Learning policy• Group Third Party policy• Responsible and Sustainable Business Sector Statement<p>The Group has reporting and escalation processes in place in the event of non-compliance with the risk mitigation requirements in the Group's Risk policies.</p></div>
<div>(m)</div>	<div>Description of the link (transmission channels) between environmental risks with credit risk, liquidity and funding risk, market risk, operational risk and reputational risk in the risk management framework</div> <div><p>The Group ESG risk management framework sets out the approach to the management of ESG risk factors in the Group. ESG risk management is relatively immature across the industry and continues to evolve. Implementation to date, in the Group and industry, has largely focused on climate-related risk and other environmental (non-climate) risk drivers with regulatory expectations set out in the ECB Guide on Climate-related and Environmental Risks (November 2020). The Group has leveraged the requirements of the EU CSRD to expand disclosures in relation to the identification and management of ESG risks. In FY24, a Double Materiality Assessment, using the double materiality concept was conducted across ESG topics.</p><p>ESG factors represent a common driver across the Group's principal and sub risk types. The Group address ESG risk factors through the risk policies attached to the Group's principal and sub risk types. The Group has integrated climate-related and other environmental risk into the Group's Credit Risk, Liquidity Risk, Market Risk and Operational Risk policies. The Group addresses social risk factors in the Group's Conduct Risk, Operational Risk and Credit Risk policies – see Section (d) above for further details. As per the Group's Double Materiality Assessment, undertaken in 2024, the impact of social risk factors has been assessed as having a non-material impact for liquidity risk and market risk, similar to the non-material impact for Climate and Environmental Risk.</p></div>

Previous

Index

Next

Table 3 - Qualitative information on Governance risk in accordance with Article 449a CRR

Row number	Governance
(a)	<p>Institution's integration in their governance arrangements governance performance of the counterparty, including committees of the highest governance body, committees responsible for decision-making on economic, environmental, and social topics</p> <p>The Group has integrated governance considerations as part of its implementation of E, S and G factors across the business through adopting ESG considerations into its existing governance model, with strong internal controls and governance through the relevant committee(s) and management body, in line with EBA guidelines on Internal Governance.</p> <p>The Group's Credit Risk Policy is approved by the Board. The policy is aligned with and has regard to, the Group's risk appetite statement, which is approved annually by the Board. The Group's credit risk management systems operate through a hierarchy of lending authorities which are related to internal loan ratings. Governance criteria have been integrated within the Group's procedures, as part of the Customer Due Diligence and Credit Process.</p> <p>With respect to counterparties, the Group assesses general governance arrangements of counterparties as part of due diligence requirements, both as part of ESG risk assessments but also as part of standard credit rating assessments. ESG risk factors are likely to impact on a variety of key risk areas, which include but are not limited to;</p> <ul style="list-style-type: none">• management & governance, reputation and brand value,• regulatory risk & compliance, country and industry risk; and• competitive position and cash-flows. <p>Credit submissions should assess the incorporation of ESG policies into its strategic objectives and the securing of relevant industry accreditations. Management assessment should also consider best practice governance perspectives, which would include board effectiveness, diversity and ESG leadership.</p> <p>As part of the Group's credit rating process the general governance arrangements, including quality of management body and sound financials of the counterparty, are considered as part of the credit rating and PD (Probability of Default) assessments.</p> <p>The Group has in place specific procedures outlined within its Corporate and Commercial Banking ESG Lending Procedures for engaging with its counterparties. These procedures outline that credit submissions and review papers, submitted by the relationship managers on behalf of counterparties, are critically assessed with regard to its ESG-related governance arrangements. The Group assesses the governance considerations of its counterparties as part of its Customer Due Diligence process and the ongoing monitoring and review process. The Group requires credit submissions to explicitly comment on a borrower's ESG policies, how it is incorporated into its strategic objectives and whether these are measured and evidenced.</p> <p>The Group has published a Sustainability Exclusion List, approved by Group Credit Risk Committee, that sets out its ESG risk appetite for lending to potentially sensitive sectors which the Group believes cause environmental and/or social harm to society and the community. The Group has aligned its ESG Screening Criteria, within its lending procedures, to its Sustainability Exclusion List.</p> <p>The Group has set lending related risk appetite metrics in relation to ESG Risk which are reported on quarterly to the BRC and Board as part of Board Risk Reporting with any breaches escalated to the Board in line with the requirements of the Group's risk management framework. Any breaches to these exclusions represent a breach of the Group's risk appetite and are escalated to the Board in line with the requirements of the Group's risk management framework. The Group's current portfolio is materially aligned as ESG considerations have been embedded in these procedures at the point of origination and the procedure will continue to evolve in line with the Group's Sustainability Strategy.</p> <p>In relation to the Group's internal governance on evaluating cases for corporate and commercial lending, any cases considered a heightened ESG risk during initial review by the relationship manager will be subject to enhanced review and consideration by the Corporate and Commercial Banking's ESG Risk Credit Forum, prior to consideration by credit risk transaction governance or committees. The ESG Risk Credit Forum brings together relevant senior leaders on an ad-hoc basis, to consider the potential impact of ESG and reputational-sensitive issues/business decisions referred to it during the credit origination and review process based on the screening criteria and ESG risk assessment procedures.</p>
(b)	<p>Institution's accounting of the counterparty's highest governance body's role in non-financial reporting</p> <p>As part of its customer onboarding process and ongoing customer due diligence process conducted annually, the Group conducts an assessment of its customers' non-financial reporting. The assessment is conducted in line with the Group's Sustainability Exclusion List and the Group's Corporate and Commercial Banking ESG Risk Lending Procedures. In cases where a fully extensive ESG Risk analysis may not be practical, due to limitations on available information and maturity of its counterparties ESG programme, relationship managers use best efforts to assess their counterparties' ESG risk.</p>
(c)	<p>Institution's integration in governance arrangements of the governance performance of their counterparties including:</p> <p>(i) Ethical considerations (ii) Strategy and risk management (iii) Inclusiveness (iv) Transparency (v) Management of conflict of interest (vi) Internal communication on critical concerns</p> <p>Through the Group's ESG Risk Lending Procedures and the Sustainability Exclusion List, the Group integrates the ESG governance performance of its counterparties into its governance arrangements. For customers and transactions in all sectors, cases are initially screened using the Group's ESG Screening Criteria with the evidence in the public domain. The issues covered during the screening are as follows:</p> <ul style="list-style-type: none">- Abuses of human rights, including displacement of indigenous peoples, child and forced labour, modern slavery, human trafficking, and exploitation of poverty- Operations in internationally protected conservation areas- Major or sustained environmental or socially related campaigns against the customer- Major environmental or social incident or fine, for example, a pollution event or accident such as a mine explosion, or companies with a poor health and safety record, particularly repeated non-compliance with environmental or health and safety legislation. <p>With respect to the assessment of general governance arrangements of counterparties as part of due diligence requirements and as part of standard credit rating, the ESG Risk assessment will consider a range of factors. Relevant factors will differ depending on the industry and business activity; however, governance examples include:</p> <p>i) Ethical considerations: Assessment of a counterparties' code of conduct and company values, anti-bribery and corruption policies</p> <p>ii) Strategy and risk management: Assessment of a counterparties':</p> <ul style="list-style-type: none">• management & governance, reputation and brand value,• regulatory risk & compliance, country and industry risk,• competitive position and cash-flows,• the incorporation of ESG policies into its strategic objectives, and• the securing relevant industry accreditations <p>iii) Inclusiveness: Assessment of a counterparties' policies on diversity and ESG leadership,</p> <p>iv) Transparency: Assessment of a counterparties' policies on political contributions and lobbying, and remunerations</p> <p>v) Management of conflict of interest and internal communication on critical concerns: Assessment of a counterparties' Speak Up policy and corporate governance frameworks</p> <p>Credit submissions are required to assess the incorporation of ESG policies into its strategic objectives and the securing of relevant industry accreditations. Management assessment are also required to consider best practice governance perspectives, which would include board effectiveness, diversity and ESG leadership.</p> <p>As part of its credit rating process the general governance arrangements, including quality of management body and sound financials of the counterparty, are considered as part of the credit rating and PD (Probability of Default) assessments.</p>

	Risk management	
	<p>Institution's integration in risk management arrangements the governance performance of their counterparties considering:</p> <p>i) Ethical considerations: ii) Strategy and risk management iii) Inclusiveness iv) Transparency v) Management of conflict of interest vi) Internal communication on critical concerns</p> <p>On an ongoing basis, through it risk management framework, policies and processes, the Group identifies and assesses risk to which the Group is exposed. The Group's risk management framework sets out the risk management, measurement, and reporting requirements for the Group's risks. The Group ESG risk management framework sets out the Group approach to ESG risk management. ESG factors represent a common risk driver across the Group's principal and sub risk types and are managed through each of the Group's principal and sub risk types. The Group applies a risk lens to ensure that the impact of ESG across the Group's risk types is considered on an ongoing basis and that the aggregate impact arising from ESG risk drivers is given appropriate consideration. While ESG risk management is managed through the Group's principal and sub risk types, the Group also has dedicated resources to lead the co-ordination of the Group's approach to ESG risk management, both in first line of defence (1LOD) (Sustainability Team, Group Finance) and in second line of defence (2LOD) (Business, Strategic and ESG Risk Team, Group Risk).</p> <p>The Group defines ESG risk as the risk to the Group that ESG factors (environmental, social or governance matters) could cause a material negative impact on:</p> <ul style="list-style-type: none">• the Group's earnings, capital, franchise value, or reputation;• the Group's regulatory standing;• the long-term sustainability of its customers' operations and financial wellbeing; and• the communities and environment in which the Group and its customers operate. <p>Social and Governance risk is defined in the Group as the risk to the Group of any material negative impact from current or prospective impacts of social or governance risk factors including, actions by the Group or by the Group's supply chain, which could lead to a negative impact on the rights, well-being and interests of the Group and its customers, colleagues, and wider stakeholders.</p> <p>Co-ordinated by Group Risk, the ESG Risk Working Group brings together 2LOD risk management from across the principal and sub risk types (with representation from 1LOD Group Sustainability) to ensure that there is a co-ordinated, cohesive and challenging approach to the management of ESG risks within the Group.</p> <p>The Group's risk management framework sets out the risk management, measurement, and reporting requirements for the Group's risks. The Group ESG risk management framework sets out the Group approach to ESG risk management. ESG factors represent a common risk driver across the Group's principal and sub risk types and are managed through each of the Group's principal and sub risk types. Management of risk exposure to lending counterparties is captured through these frameworks and the Group's credit policies and standards and lending procedures. The Group's requirements in this regard include assessment of ESG risk factors as part of lending applications, the ESG screening process (see below).</p> <p>(d) The Corporate and Commercial Banking's ESG Risk Credit Forum brings together relevant senior leaders on an ad-hoc basis, to consider the potential impact of ESG and reputational-sensitive issues/business decisions referred to it during the credit origination and review process based on the screening criteria (as outlined in the Sustainability Exclusion List).</p> <p>As noted in the Group's answer to (c), the issues covered during the relationship managers' ESG screening process are as follows:</p> <ul style="list-style-type: none">- Abuses of human rights, including displacement of indigenous peoples, child and forced labour, modern slavery, human trafficking, and exploitation of poverty- Operations in internationally protected conservation areas- Major or sustained environmental or socially related campaigns against the customer- Major environmental or social incident or fine, for example, a pollution event or accident such as a mine explosion, or companies with a poor health and safety record, particularly repeated non-compliance with environmental or health and safety legislation. <p>As noted in the Group's answers to (a) and (c) above, the Group's Corporate and Commercial Banking lending strategy is aligned to the ESG Risk screening and assessment process set out above. For more details on ESG Risk credit procedures please see Table 1 section (d). The Group's lending activities are governed by the Group Credit policy.</p> <p>In addition to the screening for ESG governance issues described above, the Group is dedicated to supporting the ongoing protection of the financial system and its customers from the impact of financial crime.</p> <p>The Group's comprehensive Financial Crime framework includes, policies, and procedures designed to identify, assess, mitigate and manage financial crime risks. Through this framework, the Group complies with its regulatory obligations and align its strategy with industry best practices, ensuring the Group is supporting its customers and communities while also building its own resilience.</p> <p>The Group manages financial crime events through a Three Lines of Defence approach with the Group Board responsible for oversight of financial crime risk. Its Money Laundering Reporting Officer (MLRO) leads the Group's Financial Crime Compliance team and is responsible for undertaking annual Enterprise-Wide Risk Assessments. These assessments evaluate Money Laundering Terrorist Financing Risk, Sanctions Risk and Fraud Risk and identifies enhancements to the Financial Crime framework to ensure continued compliance with relevant regulations and legislative duties. The outcome of these assessments are reported to the Group's Board. The MLRO monitors and oversees financial crime controls across the Group, working with its assurance teams to regularly report on Key Risk Indicators to Senior Management and the Board. The Group Financial Crime policies are all essential to its framework and are informed by its engagement with law enforcement, regulators, and industry.</p> <p>In line with the Financial Crime policy, and mandatory procedures, all colleagues are responsible for completing their mandatory training curriculum to understand their obligations in respect of mitigating financial crime risk. Training requirements (mandatory annual web-based training and tailored training) are called out in the Financial Crime policy and cover money laundering risk, sanctions risk and fraud, bribery, corruption and tax evasion risk. Bribery & Corruption web-based training is part of the annual mandatory training which is assigned to all colleagues. Group Financial Crime Compliance (FCC) provide annual Anti-Money Laundering (AML) / countering the financing of terrorism (CFT) training to the Group Board whilst subsidiary MLROs are responsible for providing the training to their respective boards. The latest training to the Group Board was provided by FCC on 23 October 2024.</p> <p>The Group monitors customer transactions to identify unusual or suspicious activities. When the Group onboards new customers, it conducts due diligence and screens them against national and international sanctions or terrorism lists. Where customers present as high-risk, the Group completes enhanced due-diligence, requesting further information to understand the risk.</p> <p>Irrespective of risk rating, all its customers are screened on an ongoing basis to ensure continued compliance with screening obligations.</p>	
Previous	Index	Next

Environmental, Social and Governance (ESG) Risk

Bank of Ireland Group plc

Table 10.1 shows information on those assets more exposed to the risks that institutions may face from the transition to a low carbon and climate resilient economy.

Table 10.1 - Template 1 - Banking book- Indicators of potential climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity

Sector/subsector	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
	Gross carrying amount (Mln EUR)					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (Mln EUR)			GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting	<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity
	Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures	Of which Stage 2 exposures	Of which non-performing exposures	Of which Scope 3 financed emissions									
1 Exposures towards sectors that highly contribute to climate change*	19,293	129	0	5,301	935	(615)	(216)	(347)	9,923,291	8,308,113	0.40%	13,722	2,729	1,106	1,736	4
2 A - Agriculture, forestry and fishing	1,720	58	0	249	58	(43)	(21)	(13)	905,926	831	0.00%	725,693	335	459	95	7
3 B - Mining and quarrying	113	1	0	12	16	(6)	(0)	(5)	366,821	75,156	0.00%	93	18	1	1	4
4 B.05 - Mining of coal and lignite	-	-	0	-	-	-	-	-	-	-	-	-	-	-	-	-
5 B.06 - Extraction of crude petroleum and natural gas	-	-	0	-	-	-	-	-	-	-	-	-	-	-	-	-
6 B.07 - Mining of metal ores	-	-	0	-	-	-	-	-	-	-	-	-	-	-	-	-
7 B.08 - Other mining and quarrying	84	0	0	3	0	(1)	(1)	(0)	306,658	58,620	0.00%	71	13	-	1	5
8 B.09 - Mining support service activities	28	1	0	9	16	(5)	(0)	(5.0)	60,163	16,536	0.00%	23	5	1	0	3
9 C - Manufacturing	4,119	30	0	1,605	190	(161)	(69)	(85)	6,263,026	5,743,163	1.23%	3,078	517	31	493	3
10 C.10 - Manufacture of food products	1,339	5	0	389	1	(18)	(14)	(1)	1,684,575	1,438,464	0.00%	879	116	4	340	3
11 C.11 - Manufacture of beverages	141	-	0	85	-	(2)	(2)	-	49,586	46,084	16.82%	134	-	-	7	3
12 C.12 - Manufacture of tobacco products	-	-	0	-	-	-	-	-	-	-	-	-	-	-	-	-
13 C.13 - Manufacture of textiles	14	-	0	0	0	(.1)	(.0)	(.1)	7,561	5,363	0.00%	13	0	0	0	2
14 C.14 - Manufacture of wearing apparel	82	-	0	56	25	(7)	(4.2)	(2)	8,051	7,662	0.00%	82	-	-	-	3
15 C.15 - Manufacture of leather and related products	-	-	0	-	-	-	-	-	-	-	-	-	-	-	-	-
16 C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw	92	-	0	6	32	(12)	(0)	(12)	123,291	111,216	0.00%	68	8	1	16	3
17 C.17 - Manufacture of pulp, paper and paperboard	30	-	0	-	27	(14)	-	(14)	38,139	34,436	0.00%	30	-	-	1	2
18 C.18 - Printing and service activities related to printing	99	-	0	49	-	(2)	(1)	-	14,906	14,135	25.62%	99	-	-	1	3
19 C.19 - Manufacture of coke oven products	1	1	0	-	1	(.8)	-	(1)	1,721	1,497	0.00%	1	-	-	1	2
20 C.20 - Production of chemicals	207	-	0	126	0	(4)	(4)	(0)	338,167	256,799	0.00%	178	17	2	9	3
21 C.21 - Manufacture of pharmaceutical preparations	161	-	0	116	-	(5)	(4)	-	62,316	54,766	0.00%	147	14	-	-	3
22 C.22 - Manufacture of rubber products	148	-	0	47	16	(12)	(6)	(5)	333,787	322,577	0.00%	112	34	2	-	4
23 C.23 - Manufacture of other non-metallic mineral products	47	-	0	-	12	(9)	-	(9)	40,810	30,847	0.00%	31	5	-	11	2
24 C.24 - Manufacture of basic metals	32	-	0	13	-	(1)	(0)	-	22,503	19,646	0.00%	-	28	-	5	5
25 C.25 - Manufacture of fabricated metal products, except machinery and equipment	134	-	0	57	-	(2)	(2)	-	159,675	144,351	6.27%	91	17	4	22	3
26 C.26 - Manufacture of computer, electronic and optical products	213	-	0	120	0	(8)	(7)	(.1)	224,633	203,108	0.00%	193	20	-	-	3
27 C.27 - Manufacture of electrical equipment	192	-	0	65	-	(4)	(4)	-	496,438	487,625	0.00%	142	43	-	7	4
28 C.28 - Manufacture of machinery and equipment n.e.c.	406	12	0	206	29	(21)	(8)	(14)	1,795,624	1,779,899	0.00%	298	96	3	10	3
29 C.29 - Manufacture of motor vehicles, trailers and semi-trailers	54	-	0	37	14	(13)	(2)	(12)	65,689	59,336	0.00%	54	-	-	-	2
30 C.30 - Manufacture of other transport equipment	16	-	0	-	-	(.0)	-	-	13,856	13,222	0.00%	12	-	-	4	1
31 C.31 - Manufacture of furniture	20	-	0	0	0	(.1)	-	-	22,974	20,752	0.00%	5	14	-	1	5
32 C.32 - Other manufacturing	655	12	0	231	33	(26)	(10)	(14)	717,683	654,481	0.00%	490	103	14	47	3
33 C.33 - Repair and installation of machinery and equipment	34	-	0	1	-	(.3)	(.1)	-	41,041	36,897	0.00%	19	2	-	-	2
34 D - Electricity, gas, steam and air conditioning supply	535	22	0	78	21	(18)	(5)	(13)	358,807	55,537	0.00%	44	198	224	70	11
35 D35.1 - Electric power generation, transmission and distribution	512	0	0	78	0	(6)	(5)	(-2)	347,044	53,799	0.00%	23	197	224	67	11
36 D35.11 - Production of electricity	495	22	0	77	0	(6)	(5)	(.0)	292,728	43,938	0.00%	22	197	224	52	11
37 D35.2 - Manufacture of gas; distribution of gaseous fuels through mains	0	0	0	0	-	(.0)	(.0)	(.0)	75	64	0.00%	0	0	-	-	13
38 D35.3 - Steam and air conditioning supply	24	0	0	-	21	(12.4)	(12)	-	11,688	1,674	0.00%	21	-	-	-	3
39 E - Water supply; sewerage, waste management and remediation activities	96	-	0	30	-	(1)	(1)	-	10,938	6,744	0.00%	66	30	-	-	5
40 F - Construction	370	-	0	53	14	(10)	(3)	(6)	54,554	41,150	0.00%	301	54	4	12	4
41 F.41 - Construction of buildings	55	-	0	3	1	(1)	(.2)	(.5)	6,461	3,473	0.00%	50	5	-	1	4
42 F.42 - Civil engineering	109	-	0	0	2	(2)	(0)	(2)	20,555	18,232	0.00%	77	30	-	1	4
43 F.43 - Specialised construction activities	206	-	0	50	11	(7)	(3)	-	27,538	19,445	0.00%	174	19	4	10	5
44 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	2,308	71	0	498	43	(47)	(22)	(16)	1,281,081	1,221,923	0.81%	1,062	310	103	833	3
45 H - Transportation and storage	817	4	0	132	90	(59)	(6)	(51)	156,159	72,511	1.07%	470	224	82	41	5
46 H.49 - Land transport and transport via pipelines	225	0	0	45	26	(15)	(2)	(13)	42,825	30,701	0.00%	157	27	3	38	3
47 H.50 - Water transport	68	2	0	2	0	(0)	(0)	-	13,961	6,860	0.00%	64	1	0	2	4
48 H.51 - Air transport	10	-	0	-	-	(0)	-	-	2,067	4,926	100.00%	10	-	-	-	5
49 H.52 - Warehousing and support activities for transportation	514	2	0	85	64	(43)	(3)	(38)	97,306	30,024	0.00%	239	196	79	-	6
50 H.53 - Postal and courier activities	-	-	0	-	-	-	-	-	-	-	-	-	-	-	-	-
51 I - Accommodation and food service activities	1,477	-	0	426	65	(26)	(11)	(12)	263,970	210,769	0.00%	1,025	255	66	131	6
52 L - Real estate activities	7,738	-	0	2,218	438	(244)	(86)	(139)	262,009	155,467	0.00%	6,752	788	137	61	3
53 Exposures towards sectors other than those that highly contribute to climate change*	6,709	-	0	1,832	340	(259)	(71)	(167)	-	-	-	4,688	1,246	370	406	5
54 K - Financial and insurance activities	50	-	0	1	0	(.3)	(.0)	(.1)	-	-	-	33	4	-	12	2
55 Exposures to other sectors (NACE codes J, M - U)	6,659	-	0	1,831	340	(258)	(71)	(167)	-	-	-	4,655	1,241	370	393	4
56 TOTAL	26,003	129	0	7,133	1,275	(874)	(287)	(514)	9,923,291	8,308,113	0.40%	18,409	3,974	1,477	2,142	4

* In accordance with the Commission delegated regulation (EU) 2020/1818 supplementing regulation (EU) 2016/1011 as regards minimum standards for EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks -Climate Benchmark Standards Regulation - Recital 6: Sectors listed in Sections A to H and Section L of Annex I to Regulation (EC) No 1893/2006

Quantitative ESG Risk Templates - Narrative Disclosures

Bank of Ireland Group plc

Template 1: Banking Book - Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity

Disclosure Basis

This template provides information on exposures to non-financial counterparties operating in sectors that significantly contribute to climate change, including information on the credit quality and maturity profile of the exposures. The exposure information and classifications presented in the table is aligned to FINREP and may differ to other external reporting by the Group. The disclosure scope for this template includes exposures in the banking book, including loans and advances, debt securities and equity instruments to non-financial corporations, other than those held for trading.

NACE Sector Classifications

For this disclosure, the rows of the template breakdown include the gross carrying amount of loans and advances, debt securities and equity instruments to non-financial corporations, other than those held for trading, by sector of economic activities using NACE codes based on the principal activity of the counterparty. This breakdown is reconciled to the equivalent FINREP tables at NACE Classification Level 1 (21 sections identified by alphabetical letters A to U), and incorporates debt securities and equity instruments. For this disclosure, the FINREP NACE breakdown has been extended through a central exercise to NACE Level 2 (further sub-classifications denoted by two-digit numerical codes) for the sectors that highly contribute to climate change. The Group has an exposure of EUR 26 billion, distributed between those sectors identified by the EBA as major climate change contributors (74% – NACE A–I and L) and other, less polluting sectors (26% – NACE K, J, M–U).

Paris-aligned benchmarks

For the H1 2025 disclosure, the Group has conducted a materiality-based exercise to identify counterparties within relevant sectors that are excluded from the EU Paris-aligned benchmarks as specified in Article 12(1), points (d) to (g) and Article 12(2) of Delegated Regulation (EU) 2020/1818. The criteria as prescribed were applied to corporate banking counterparties which resulted in exposures being identified in column b of Template 1. The Group acknowledges the request from the regulator for this portion of the template to exclude companies that significantly harm one or more of the EU Taxonomy Environmental Objectives, however no significant testing against the DNSH criteria has taken place as of publication of this disclosure. The percentage of lending to non-financial corporates excluded from Paris-aligned benchmarks on this basis is <1%.

Environmentally Sustainable Exposures (CCM)

In August 2025, the EBA published a no-action letter regarding the implementing technical standards on amended disclosures requirements for ESG risks. The publication of the GAR templates was suspended until December 2026. Therefore, the "Of which environmentally sustainable (CCM)" column of this template will also not be reported.

GHG Emissions

GHG financed emissions are provided in line with the PCAF Part A Standards on Financed Emissions. This sees the estimates reported in columns (i–j) with the percentage of the portfolio weighted by gross carrying amount (GCA) where the Group has been able to estimate the counterparties scope 1, 2 & 3 financed emissions based on:

- (i) information disclosed by the counterparties;
- (ii) proxy estimates provided by ICE Sustainable Finance when direct disclosed estimates are not available. These proxy estimates are inferred by ICE based on economic activity (NACE Sector), geographic location and revenue of counterparties (based on available data);
- (iii) emissions for the NACE Sector L - Real estate activities and D35.11 - Production of electricity are estimated in line with the Group's emission quantification methods applied for Science Based Targets.

This sees the majority of the estimated emissions generated by the NFC portfolio in the Scope 3 category, and this proportionality is in line with ECB system level emissions studies. However the Group recognises that measurement methodologies and data availability remain at an early stage of development across the industry which means emissions intensity estimates are not necessarily comparable across different financial institutions.

This is a particular consideration for Scope 3 estimation where limitations are noted in the PCAF Standard: 'PCAF acknowledges that, to date, the comparability, coverage, transparency, and reliability of Scope 3 data still varies greatly per sector and data source'. Due to this the Group has leveraged ICE's methodologies that infer Scope 3 estimates that accounts for incomplete coverage in reported emissions by counterparties. Furthermore as financial institutions are aggregators of emissions data for NFC counterparties, the potential for double counting of emissions due to overlaps across company supply chains is a further inherent limitation of the current approach.

The Group acknowledges these current limitations and is continuing to develop its methodologies and data coverage in this space. In addition, the level of direct estimates disclosed by counterparties will increase over time in line with the introduction of the Corporate Sustainability Reporting Directive (CSRD) and will reduce current levels of dependence on proxy estimates. In the meantime, variation in emission metrics may not always reflect changes in customers' emissions, but could result from changes in other factors, such as changes in revenue and production for various reasons such as global events, and new data sources and methodologies used to estimate emissions in the absence of externally published customer emissions.

Table 10.2 below requires institutions to disclose the total gross carrying amounts by level energy consumption and by EPC label with a breakdown by location (EU vs. non-EU area) differentiating between loans collateralised by commercial immovable property, loans collateralised by residential immovable property and collateral obtained by taking possession.

Table 10.2 - Template 2 - Banking book - Indicators of potential climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral

Counterparty sector	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
	Total gross carrying amount (in MEUR)															
		Level of energy efficiency (EP score in kWh/m² of collateral)						Level of energy efficiency (EPC label of collateral)						Without EPC label of collateral		
		0; <= 100	> 100; <= 200	> 200; <= 300	> 300; <= 400	> 400; <= 500	> 500	A	B	C	D	E	F			G
1 Total EU area	38,959	11,490	11,966	8,322	2,828	2,399	1,926	3,846	1,667	2,246	932	500	189	150	29,429	100%
2 Of which Loans collateralised by commercial immovable property	3,386	333	286	340	439	34	1,926	459	428	219	70	37	6	6	2,160	99%
3 Of which Loans collateralised by residential immovable property	35,573	11,157	11,680	7,981	2,389	2,365	-	3,386	1,239	2,028	861	463	183	143	27,270	100%
4 Of which Collateral obtained by taking possession: residential and commercial immovable property	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0%
5 Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated	34,075	9,430	10,508	7,443	2,526	2,290	1,878	-	-	-	-	-	-	-	29,429	100%
6 Total non-EU area	17,085	1,454	4,159	6,916	2,222	548	231	73	1,782	4,231	5,408	1,584	248	48	3,712	62%
7 Of which Loans collateralised by commercial immovable property	1,556	-	-	-	-	-	-	19	122	3	7	0	-	-	1,404	0%
8 Of which Loans collateralised by residential immovable property	15,530	1,454	4,159	6,916	2,222	548	231	54	1,660	4,228	5,401	1,584	248	48	2,307	100%
9 Of which Collateral obtained by taking possession: residential and commercial immovable property	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0%
10 Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated	2,316	41	363	1,482	367	51	11	-	-	-	-	-	-	-	2,307	100%

Template 2: Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral
Disclosure Basis
The Group is committed as part of its sustainability ambitions to support its customers to increase their residential energy efficiency whilst encouraging the purchase of energy efficient properties. Energy efficiency is represented by Energy Performance Certificate (EPC) rating, with A indicating the best and G the worst in terms of energy efficiency. The processes for disclosing EPC and Energy performance (EP) information differ across the key EU and non-EU jurisdictions that the Group operates in – Republic of Ireland (ROI) and United Kingdom (UK). They are set out as follows:
ROI lending collateralised by immovable property
2024 saw system implementation of BER data capture (Building Energy Ratings – the Irish equivalent of EPC) and the launch of EcoSaver which incentivises customers to provide EPC ratings for properties. These actions have seen substantial progress on increasing EPC data coverage on the portfolio during 2024, ending H1 2025 at 23% from 0% end FY23. A national database maintained by the Sustainable Energy Authority of Ireland (SEAI) on domestic properties with recorded energy ratings has been used to provide a proxy view on the energy rating profile of ROI lending collateralised by residential property, based on key explanatory factors (namely year of build, property type and location).
For the H1 2025 disclosure, 36% of the EPC data for ROI and other EU commercial lending collateralised by commercial immovable property is based on specific EPC labels collected through internal processes. For the residual ROI located properties, SEAI national data on non-domestic properties is used to estimate the energy rating profile for those properties based on property type.
Energy Performance (EP) scores are estimated as a midpoint EP kWh/m² per annum value attaching to the energy rating per SEAI reference datasets.
UK lending collateralised by immovable property
In the UK jurisdiction, the Group has had procedures in place for the collection of EPC data for household lending collateralised by residential immovable property since 2020 and has extended the procedures to capture Energy Performance (EP) data from 2023. For this H1 2025 disclosure, 85% of the EPC data for the stock of UK mortgages is based on specific EPC labels. For the residual UK located properties, EPC ratings have been estimated based on key explanatory factors (namely year of build, property type and location).
For the H1 2025 disclosure, 10% of the EPC data for UK and other non-EU lending collateralised by commercial immovable property is based on specific EPC labels collected through internal processes. For the residual UK located properties, UK national data on non-domestic properties was used to estimate the energy rating profile for those properties based on property type. Energy Performance (EP) scores and estimates are not currently available from the Group’s data sources for UK commercial lending collateralised by commercial immovable property and this capability continues to be developed. Energy Ratings and EP scores and estimates are not currently available for the low volume of commercial properties outside ROI and UK from the Group’s data sources for this cohort.

Table 10.3 below requires institutions to disclose in this template information on their alignment efforts with the Paris Agreement objectives for a selected number of sectors. The disclosures on the alignment shall capture the extent to which financial flows are consistent with a pathway towards low greenhouse gas emissions and climate-resilient development as defined in the Paris Agreement.

Table 10.3 - Template 3 - Banking Book – Indicators of potential climate change transition risk: Alignment metrics:

a	b	c	d	e	f	g	
	Sector	NACE Sectors (a minima)	Portfolio gross carrying amount (Mn EUR)	Alignment metric	Year of reference	Distance to IEA NZE2050 in % ¹	Target (year of reference + 3 years)
1	Power	D35.11 - Production of electricity	270	0.106	kgCO2e/kWh	2024	-23% 0.073 kgCO2e/kWh
2	Fossil fuel combustion						
3	Automotive						
4	Aviation						
5	Maritime transport						
6	Cement, clinker and lime production						
7	Iron and steel, coke, and metal ore production						
8	Chemicals						
9	... potential additions relevant to the business model of the institution						
1. Point in Time (PIT) distance to 2030 NZE2050 scenario in % (for each metric)							

¹ - Point in Time (PIT) distance to 2030 NZE2050 scenario in % (for each metric)

Template 3: Banking Book – Climate Change Transition Risk: Alignment Metrics:

In 2022 Bank of Ireland Group set Science based targets (SBTs) to set its portfolios and lending practices on a pathway that is aligned with the Paris Agreement goals.

These independently validated targets guide its emission reduction plans and are contingent on the current Irish and UK governments' Climate Action Plan ambitions and planned actions. The majority of Bank of Ireland emissions stem from its economic lending activities. Achieving its ambitious Scope 3 SBTi targets necessitates significant progress in national climate action plans in both Ireland and the UK. Additionally, the successful realisation of these targets relies on the actions taken by its customers.

Its ambition is to actively assist them in transitioning to more sustainable practices, both in their lifestyles and business operations. Given the integral role of the financial services sector in its economies, the Group recognise its potential as a key facilitator of the low-carbon transition. By setting SBTi emission reduction targets, the Group underscores its commitment to facilitating tangible change for its customers and society.

In 2022, the Group became the first Irish bank to have its Greenhouse gas (GHG) emission reduction targets validated by SBTi, covering all the Group's operations and 71% of its FY2020 baseline loan book. This includes Scope 1 and 2 emissions present in its operations and Scope 3 emissions in its downstream value chain. Having its GHG targets validated by the global gold standard SBTi reinforces the credibility of its commitment to assisting Ireland in achieving its climate targets.

The SBTi validated its target of a 49% reduction in GHG emissions from its own operations (Scope 1 and 2), which supports its broader aim of net zero emissions in its own operations by 2030. Reduction targets have also been set for emissions arising from the Bank's lending activities (Scope 3) which are consistent with levels required to meet the goals that are aligned to the 1.5°C Paris Agreement. Under the SBTi validated sector decarbonisation approach (SDA) targets, the Group are committing to a 48% reduction in residential mortgage portfolio emissions (Ireland and UK), a 56% reduction in commercial real estate portfolio emissions and a 76% reduction in electricity generation project finance portfolio emissions by 2030. The base year for the reduction targets is 2020. Under the SBTi validated portfolio coverage approach (PCA) targets, 25% of the Bank's corporate loan portfolio and corporate bonds will have SBTi validated targets by 2025.

Regarding the scope of counterparties included in this Template 3, it is important to note that this disclosure focuses on non-financial counterparties, while as a pre-dominantly retail based lender BOI's climate strategy encompasses all counterparties, including lending to households and SBTs on residential mortgages.

The Group's Annual Report (AR) serves as its primary disclosure, where the Group provide comprehensive updates on its progress in implementing its climate strategy. Individual SBT report cards in its FY2023 Annual Report track its progress against the six target categories. Please refer to pages 68-71 of the Group's 2024 Annual Report. for details on metrics, progress to date, convergence pathways and data quality. Targets have been validated by SBTi with reference to convergence pathways that are denoted in the report cards as follows:

- SBTi 1.5°C: SBTi pathway designed to facilitate limiting warming to 1.5 degrees Celsius above pre-industrial levels.
- ETP B2DS: Beyond 2 Degrees Scenario (B2DS) aims to limit with a 50% chance global temperature rise to 1.75 degrees Celsius above pre-industrial levels.

As of FY2024 the Group is on track to meet its 2030 SBTs across RoI mortgages, commercial real estate, electricity generation project finance and its own operations. In addition, the Group reached its 2025 target for 25% of its Corporate lending customer base having their own SBTs. Progress accelerated in 2024 and the Group expect to report further progress towards its SBTs as the Group executes its strategy, with the full impact of decarbonisation of the energy grid expected in the back end of the decade.

For the power generation sector, the target scope is on project finance electricity generation activity, where the convergence pathway is SBTi 1.5°C and the choice of the alignment metric is emissions intensity (kg of CO2e/kWh). The basis of preparation utilises power output and associated emissions based on individual counterparty data gathered as part of the project finance customer engagement and credit assessment process.

The project finance electricity generation (Power sector) is primarily comprised of renewable energy assets and is therefore starting at a lower level of intensity of emissions in its 2020 baseline relative to the IEA baseline (0.155 kgCO2/kWh versus 0.438 kgCO2/kWh). BOI's targeted 2030 intensity of 0.058 kgCO2/kWh reflects a 76% reduction versus the BOI baseline and emissions intensity is reducing aligned to a linear path towards this 2030 target. This sees BOI's current carbon intensity below the IEA 2030 target of 0.138 kgCO2/kWh with further reductions planned in the next three years in line with the Group's convergence path to target.

Table 10.4 below shows the exposures towards the top 20 carbon-intensive companies in the world.

Table 10.4 - Template 4 - Banking book - Indicators of potential climate change transition risk: Exposures to top 20 carbon-intensive firms

	a	b	c	d	e
	Gross carrying amount (aggregate)	Gross carrying amount towards the counterparties compared to total gross carrying amount (aggregate)*	Of which environmentally sustainable (CCM)	Weighted average maturity	Number of top 20 polluting firms included
1	-	-		-	-
*For counterparties among the top 20 carbon emitting companies in the world					

Template 4: Banking book - Climate change transition risk: Exposures to top 20 carbon-intensive firms

The purpose of this disclosure is to show aggregate exposure to the 20 most carbon-intensive companies globally. The Group selected the following top 20 lists of carbon intensive counterparties globally from two sources referenced by the ECB guidance for this exposure assessment:

- Climate Accountability Institute (CAI)
- Carbon Disclosure Project (CDP)

For the H1 2025 disclosure, these top 20 lists were reviewed as at H1 2025 to determine if the Group had any exposure to any of the counterparties on the listings in the banking book. This assessment resulted in a nil exposure return.

Table 10.5 below provides information on exposures in the banking book (including loans and advances, debt securities and equity instruments not held for trading and not held for sale) towards nonfinancial corporates, on loans collateralised with immovable property and on repossessed real estate collateral that are exposed to chronic and acute climate-related hazards.

Table 10.5.1 - Template 5 - Banking book - Indicators of potential climate change physical risk: Exposures subject to physical risk: Ireland

a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
Variable: Geographical area subject to climate change physical risk - acute and chronic events		Gross carrying amount (Min EUR)												
		of which exposures sensitive to impact from climate change physical events												
		Breakdown by maturity bucket					of which exposures sensitive to impact from chronic climate change events	of which exposures sensitive to impact from acute climate change events	of which exposures sensitive to impact both from chronic and acute climate change events	Of which Stage 2 exposures	Of which non-performing exposures	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		
		<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity						of which Stage 2 exposures	Of which non-performing exposures	
1 A - Agriculture, forestry and fishing	1,467	-	-	-	-	-	-	-	-	-	-	-	-	-
2 B - Mining and quarrying	87	-	-	-	-	-	-	-	-	-	-	-	-	-
3 C - Manufacturing	1,837	-	-	-	-	-	-	-	-	-	-	-	-	-
4 D - Electricity, gas, steam and air conditioning supply	223	-	-	-	-	-	-	-	-	-	-	-	-	-
5 E - Water supply; sewerage, waste management and remediation activities	66	-	-	-	-	-	-	-	-	-	-	-	-	-
6 F - Construction	226	0	-	-	-	1	-	0	-	0	-	0	-	0
7 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	1,753	-	-	-	-	-	-	-	-	-	-	-	-	-
8 H - Transportation and storage	589	-	-	-	-	-	-	-	-	-	-	-	-	-
9 L - Real estate activities	5,921	116	-	-	-	4	-	116	-	15	0	1	-	0
10 Loans collateralised by residential immovable property	35,573	11	35	131	244	21.0	-	420	-	17	5	(2)	-	(1)
11 Loans collateralised by commercial immovable property	3,362	148	15	0	-	2.0	-	163	-	46	46	(25)	-	(1)
12 Repossessed colaterals	-	-	-	-	-	-	-	-	-	-	-	-	-	(23)
13 Other relevant sectors (breakdown below where relevant)	4,069	1	0	-	-	4	-	2	-	-	-	(.0)	-	-

Table 10.5.2 - Template 5 - Banking book - Indicators of potential climate change physical risk: Exposures subject to physical risk: UK

a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
Variable: Geographical area subject to climate change physical risk - acute and chronic events		Gross carrying amount (Min EUR)												
		of which exposures sensitive to impact from climate change physical events												
		Breakdown by maturity bucket					of which exposures sensitive to impact from chronic climate change events	of which exposures sensitive to impact from acute climate change events	of which exposures sensitive to impact both from chronic and acute climate change events	Of which Stage 2 exposures	Of which non-performing exposures	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		
		<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity						of which Stage 2 exposures	Of which non-performing exposures	
1 A - Agriculture, forestry and fishing	224	-	-	-	-	-	-	-	-	-	-	-	-	-
2 B - Mining and quarrying	9	-	-	-	-	-	-	-	-	-	-	-	-	-
3 C - Manufacturing	393	-	-	-	-	-	-	-	-	-	-	-	-	-
4 D - Electricity, gas, steam and air conditioning supply	285	-	-	-	-	-	-	-	-	-	-	-	-	-
5 E - Water supply; sewerage, waste management and remediation activities	30	-	-	-	-	-	-	-	-	-	-	-	-	-
6 F - Construction	21	-	-	-	-	-	-	-	-	-	-	-	-	-
7 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	210	-	-	-	-	-	-	-	-	-	-	-	-	-
8 H - Transportation and storage	131	-	-	-	-	-	-	-	-	-	-	-	-	-
9 L - Real estate activities	1,477	0	-	-	-	4	-	0	-	-	-	0	-	-
10 Loans collateralised by residential immovable property	15,530	85	99	94	274	18.0	184	354	13	35	17	(4)	-	(3)
11 Loans collateralised by commercial immovable property	1,220	0	-	-	-	3.0	-	0	-	-	-	(1)	-	-
12 Repossessed colaterals	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13 Other relevant sectors (breakdown below where relevant)	1,819	-	-	-	-	-	-	-	-	-	-	-	-	-

Table 10.5.3 - Template 5 - Banking book - Indicators of potential climate change physical risk: Exposures subject to physical risk: Other

a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
1 A - Agriculture, forestry and fishing	28	-	-	-	-	-	-	-	-	-	-	-	-	-
2 B - Mining and quarrying	17	-	-	-	-	-	-	-	-	-	-	-	-	-
3 C - Manufacturing	1,889	-	-	-	-	-	-	-	-	-	-	-	-	-
4 D - Electricity, gas, steam and air conditioning supply	28	-	-	-	-	-	-	-	-	-	-	-	-	-
5 E - Water supply; sewerage, waste management and remediation activities	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6 F - Construction	123	-	-	-	-	-	-	-	-	-	-	-	-	-
7 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	345	-	-	-	-	-	-	-	-	-	-	-	-	-
8 H - Transportation and storage	96	2	-	-	-	2	2	-	-	2	-	(0)	-	(0)
9 L - Real estate activities	340	-	0	-	-	5	0	-	-	-	-	(0)	-	-
10 Loans collateralised by residential immovable property	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11 Loans collateralised by commercial immovable property	359	0	-	-	-	2.0	-	0	-	-	-	(1)	-	-
12 Repossessed colaterals	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13 Other relevant sectors (breakdown below where relevant)	2,298	1	-	-	-	-	1	-	-	1	-	(0)	-	0

Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk

Physical Risk Assessment

The Group has developed capabilities to identify, measure and monitor the potential financial impacts emerging from climate-related physical risks. For this purpose, the Group has acquired data from Moody’s to assess physical risks, also used by the ECB to provide physical risk assessments for the 2022 ECB Climate Stress Test.

The data provided by Moody’s provides coverage at a NUTS 3 level (See Footnote 1) across six sub-types of physical risk that have been categorised into acute and chronic physical risk categories as follows:

Acute Physical Risks:

- Floods
- Hurricanes & Typhoons
- Wildfires

Chronic Physical Risks:

- Heat Stress
- Sea Level Risk
- Water Stress

For exposures collateralised by immovable property (residential and commercial), in line with guidance the collateral location is used to assign exposures to the NUTS3 regions level to assess the exposure to physical risk. Where the lending is not collateralised, the country of risk is used.

- If any of the three chronic risks together with any of the three acute risks are classed as “Highly Exposed” for that region – the exposure is classed as Sensitive to Impact from both Chronic and Acute Physical Risks – column (j), if applicable.
- Else if any of the three chronic physical risks are classed as “Highly Exposed” for that region – the exposure is classed as “Sensitive to Impact from Chronic Physical Risks” - column (h)
- Else if any of the three acute physical risks are classed as “Highly Exposed” for that region – the exposure is classed as “Sensitive to Impact from Acute Physical Risks” – column (i)

Additional Risk Assessment

As an additional step a more property specific physical risk assessment has been undertaken for properties in ROI and UK that are residential or commercial property collateral for lending exposures. The locations of these properties have been geo-coded for flood risk assessment. Using latitude and longitude, properties are matched to building and street based on address data available.

JBA Flood Risk Management are a leading provider of climate flood modelling in the Irish and UK market. Flood scores, based on JBA’s flood matrix, are allocated per geo-coded property based on the potential flood damage to property dependent on the type, frequency and depth of flooding modelled across different return periods; for example, coastal flooding will involve salt water, which can cause more property damage than river flood water and therefore has a higher score than the equivalent river flood score. The scoring ranges from 0 to 53, with 0 being lowest and 53 being the highest risk. The flood scores are projected forward based on the RCP 8.5 Pathway (See Footnote 2) where emissions continue to rise throughout the 21st century and global temperatures increase by 2100 by 3.2 to 5.4 degrees.

Properties classed at high risk of flooding are:

- Properties in ROI with a score of 31 and above by 2050 on an undefended basis (See Footnote 3)
- Properties in UK with a probability of a flood event occurring by 2030 of >5% (See Footnote 4)

Then if they have not already flagged as sensitive in the previous steps, the exposures collateralised by properties classed as high risk of flooding in 2050 are then classed as:

- “Sensitive to Impact from Acute Physical Risks” – column (i); and
- “Sensitive to Impact from both Chronic and Acute Physical Risks” – column (j)."

Footnotes:

- 1 The Nomenclature of territorial units for statistics (NUTS) is a geographical nomenclature subdividing the economic territory of the European Union (EU) into regions at three different levels (NUTS 1, 2 and 3 respectively, moving from larger to smaller territorial units).
- 2 Representative Concentration Pathways for greenhouse gas concentration trajectories adopted by the IPCC (Intergovernmental Panel on Climate Change). The pathways describe different climate futures, all of which are considered possible depending on the volume of GHGs emitted in the years to come.
- 3 Previous reporting of flood risk in ROI did not take into account mitigating flood defences. Flood defence data is now being integrated on new properties and reflected in the reported ROI data.
- 4 Probability based on projected JBA Flood Scores.

Appendix I - Table References		Bank of Ireland Group plc	
Guideline Reference - Articles of the ITS	Table Reference	Table Name	Location Pillar 3
Article 1 - Disclosure of key metrics and overview of risk-weighted exposure amounts	EU OV1	Overview of total risk exposure amounts	Tab 2.1
Article 1 - Disclosure of key metrics and overview of risk-weighted exposure amounts	EU KM1	Key metrics template	Tab 1.1
Article 1 - Disclosure of key metrics and overview of risk-weighted exposure amounts	EU CMS1	Comparison of modelled and standardised risk weighted exposure amounts at risk level	Tab 2.2
Article 1 - Disclosure of key metrics and overview of risk-weighted exposure amounts	EU CMS2	Comparison of modelled and standardised risk weighted exposure amounts for credit risk at asset class level	Tab 2.3
Article 4 - Disclosure of Own Funds	EU CC1	Composition of regulatory own funds	Tab 2.4
Article 4 - Disclosure of Own Funds	EU CC2	Reconciliation of regulatory own funds to balance sheet in the audited financial statements	Tab 2.5
Article 5 - Disclosure of countercyclical capital buffers	EU CCyB1	Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer	Tab 2.6
Article 5 - Disclosure of countercyclical capital buffers	EU CCyB2	Amount of institution-specific countercyclical capital buffer	Tab 2.6
Article 6 - Disclosure of the leverage ratio	EU LRA	Disclosure of LR qualitative information	Leverage Ratio tab
Article 6 - Disclosure of the leverage ratio	EU LR1	LRSum: Summary reconciliation of accounting assets and leverage ratio exposures	Tab 9.1
Article 6 - Disclosure of the leverage ratio	EU LR2	LRCom: Leverage ratio common disclosure	Tab 9.2
Article 6 - Disclosure of the leverage ratio	EU LR3	LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)	Tab 9.3
Article 8 - Disclosure of liquidity requirements	EU LIQB	Qualitative information on LCR which complements template EU LIQ1	Liquidity risk tab
Article 8 - Disclosure of liquidity requirements	EU LIQ1	LCR Disclosures template	Tab 8.2
Article 8 - Disclosure of liquidity requirements	EU LIQ2	Net Stable Funding Ratio	Tab 8.3
Annex 9 – Disclosure of exposures to credit risk, dilution risk and credit quality	EU CR1	Performing and non-performing exposures and related provisions	Tab 3.9
Annex 9 – Disclosure of exposures to credit risk, dilution risk and credit quality	EU CR1-A	Maturity of exposures	Tab 3.10
Annex 9 – Disclosure of exposures to credit risk, dilution risk and credit quality	EU CR2	Changes in the stock of non-performing loans and advances	Tab 3.11
Annex 9 – Disclosure of exposures to credit risk, dilution risk and credit quality	EU CR2-A	Changes in the stock of non-performing loans and advances and related net accumulated recoveries	not applicable to BOI as NPL below 5% threshold
Annex 9 – Disclosure of exposures to credit risk, dilution risk and credit quality	EU CQ1	Credit quality of forborne exposures	Tab 3.12
Annex 9 – Disclosure of exposures to credit risk, dilution risk and credit quality	EU CQ2	Quality of forbearance	not applicable to BOI as NPL below 5% threshold
Annex 9 – Disclosure of exposures to credit risk, dilution risk and credit quality	EU CQ4	Quality of non-performing exposures by geography	Tab 3.13
Annex 9 – Disclosure of exposures to credit risk, dilution risk and credit quality	EU CQ5	Credit quality of loans and advances by industry	Tab 3.14
Annex 9 – Disclosure of exposures to credit risk, dilution risk and credit quality	EU CQ6	Collateral valuation - loans and advances	not applicable to BOI as NPL below 5% threshold
Annex 9 – Disclosure of exposures to credit risk, dilution risk and credit quality	EU CQ7	Collateral obtained by taking possession and execution processes	not applicable to BOI
Annex 9 – Disclosure of exposures to credit risk, dilution risk and credit quality	EU CQ8	Collateral obtained by taking possession and execution processes – vintage breakdown	not applicable to BOI
Article 10 - Disclosure of the use of credit risk mitigation techniques	EU CR3	CRM techniques overview: Disclosure of the use of credit risk mitigation techniques	Tab 3.15
Article 11 - Disclosure of the use of the standardised approach	EU CR4	Standardised approach – Credit risk exposure and CRM effects	Tab 3.1
Article 11 - Disclosure of the use of the standardised approach	EU CR5	Standardised approach	Tab 3.2
Article 12 - Disclosure of the use of the IRB approach to credit risk	EU CR6	IRB approach – Credit risk exposures by exposure class and PD range	Tab 3.3 and Tab 3.4
Article 12 - Disclosure of the use of the IRB approach to credit risk	EU CR7	IRB approach – Effect on the RWEAs of credit derivatives used as CRM techniques	Tab 3.5
Article 12 - Disclosure of the use of the IRB approach to credit risk	EU CR7-A	IRB approach – Disclosure of the extent of the use of CRM techniques	Tab 3.6
Article 12 - Disclosure of the use of the IRB approach to credit risk	EU CR8	RWEA flow statements of credit risk exposures under the IRB approach	Tab 3.7
Article 13 - Disclosure of specialised lending and equity exposure under the simple risk weight approach	EU CR10.1	Specialised lending : Project finance (Slotting approach)	not applicable to BOI as slotting approach not used
Article 13 - Disclosure of specialised lending and equity exposure under the simple risk weight approach	EU CR10.2	Specialised lending : Income-producing real estate and high volatility commercial real estate (Slotting approach)	not applicable to BOI as slotting approach not used
Article 13 - Disclosure of specialised lending and equity exposure under the simple risk weight approach	EU CR10.3	Specialised lending : Object finance (Slotting approach)	not applicable to BOI as slotting approach not used
Article 13 - Disclosure of specialised lending and equity exposure under the simple risk weight approach	EU CR10.4	Specialised lending : Commodities finance (Slotting approach)	not applicable to BOI as slotting approach not used
Article 13 - Disclosure of specialised lending and equity exposure under the simple risk weight approach	EU CR10.5	Equity exposures under Articles 133 (3) to (6) and 495a(3) CRR	Tab 3.8
Article 14 - Disclosure of exposures to counterparty credit risk	EU CCR1	Analysis of CCR exposure by approach	Tab 4.1
Article 14 - Disclosure of exposures to counterparty credit risk	EU CCR3	Standardised approach – CCR exposures by regulatory exposure class and risk weight	Tab 4.2
Article 14 - Disclosure of exposures to counterparty credit risk	EU CCR4	IRB approach – CCR exposures by exposure class and PD scale	Tab 4.3
Article 14 - Disclosure of exposures to counterparty credit risk	EU CCR5	Composition of collateral for exposures to CCR	Tab 4.4
Article 14 - Disclosure of exposures to counterparty credit risk	EU CCR6	Credit derivatives exposures	Tab 4.5
Article 14 - Disclosure of exposures to counterparty credit risk	EU CCR7	RWA flow statements of CCR exposures under the IMM	not applicable to BOI as IMM not used
Article 14 - Disclosure of exposures to counterparty credit risk	EU CCR8	Exposures to CCPs	Tab 4.6
Article 15 - Disclosure of exposures to securitisation positions	EU SEC1	Securitisation exposures in the non-trading book	Tab 5.1
Article 15 - Disclosure of exposures to securitisation positions	EU SEC2	Securitisation exposures in the trading book	not applicable to BOI
Article 15 - Disclosure of exposures to securitisation positions	EU SEC3	Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as originator or as sponsor	Tab 5.2
Article 15 - Disclosure of exposures to securitisation positions	EU SEC4	Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as investor	Tab 5.3
Article 15 - Disclosure of exposures to securitisation positions	EU SEC5	Exposures securitised by the institution - Exposures in default and specific credit risk adjustments	Tab 5.4
Article 16 - Disclosure of the use of the standardised approach and of the internal models for market risk	EU MR1	Market risk under the alternative standardised approach (ASA)	not applicable as pending implementation of FRTB
Article 16 - Disclosure of the use of the standardised approach and of the internal models for market risk	EU MR2	Market risk under the alternative internal model approach (AIMA)	not applicable as pending implementation of FRTB
Article 16 - Disclosure of the use of the standardised approach and of the internal models for market risk	EU MR3	Market risk under the simplified standardised approach (SSA)	not applicable as pending implementation of FRTB
Article 16 - Disclosure of the use of the standardised approach and of the internal models for market risk	EU MR1	Market risk under the standardised approach	Market Risk tab
Article 16 - Disclosure of the use of the standardised approach and of the internal models for market risk	EU MR2-A	Market risk under the internal Model Approach (IMA)	not applicable to BOI as BOI don't use the IMA approach.
Article 16 - Disclosure of the use of the standardised approach and of the internal models for market risk	EU MR2-B	RWA flow statements of market risk exposures under the IMA	not applicable to BOI as BOI don't use the IMA approach.
Article 16 - Disclosure of the use of the standardised approach and of the internal models for market risk	EU MR3	IMA values for trading portfolios	not applicable to BOI as BOI don't use the IMA approach.
Article 16 - Disclosure of the use of the standardised approach and of the internal models for market risk	EU MR4	Comparison of VaR estimates with gains/losses	not applicable to BOI
Article 17 - Disclosure of credit valuation adjustment risk	EU CVA4	RWEA flow statements of credit valuation adjustment risk under the Standardised Approach	not applicable to BOI as Standardised approach not used
Article 19 - Disclosure of exposures to interest rate risk on positions not held in the trading book	EU IRRBB1	Interest rate risks of non-trading book activities	IRRBB tab
Article 22 - Disclosure of environmental, social and governance risks (ESG risks)	Table 1	Qualitative information on Environmental risk	Environmental risk tab
Article 22 - Disclosure of environmental, social and governance risks (ESG risks)	Table 2	Qualitative information on Social risk	Social risk tab
Article 22 - Disclosure of environmental, social and governance risks (ESG risks)	Table 3	Qualitative information on Governance risk	Governance risk tab
Article 22 - Disclosure of environmental, social and governance risks (ESG risks)	Template 1	Banking book- Indicators of potential climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Tab 10.1
Article 22 - Disclosure of environmental, social and governance risks (ESG risks)	Template 2	Banking book - Indicators of potential climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral	Tab 10.2
Article 22 - Disclosure of environmental, social and governance risks (ESG risks)	Template 3	Banking book - Indicators of potential climate change transition risk: Alignment metrics	Tab 10.3
Article 22 - Disclosure of environmental, social and governance risks (ESG risks)	Template 4	Banking book - Indicators of potential climate change transition risk: Exposures to top 20 carbon-intensive firms	Tab 10.4
Article 22 - Disclosure of environmental, social and governance risks (ESG risks)	Template 5	Banking book - Indicators of potential climate change physical risk: Exposures subject to physical risk	Tab 10.5
Article 22 - Disclosure of environmental, social and governance risks (ESG risks)	Template 6	Summary of key performance indicators (KPIs) on the Taxonomy-aligned exposures	Not applicable as on hold – ref EBA no Action letter (EBA-2025-D-5275) of 5-August-2025
Article 22 - Disclosure of environmental, social and governance risks (ESG risks)	Template 7	Mitigating actions: Assets for the calculation of GAR	Not applicable as on hold – ref EBA no Action letter (EBA-2025-D-5275) of 5-August-2025
Article 22 - Disclosure of environmental, social and governance risks (ESG risks)	Template 8	GAR (%)	Not applicable as on hold – ref EBA no Action letter (EBA-2025-D-5275) of 5-August-2025
Article 22 - Disclosure of environmental, social and governance risks (ESG risks)	Template 9	Mitigating actions: BTAR	Not applicable as on hold – ref EBA no Action letter (EBA-2025-D-5275) of 5-August-2025
Article 22 - Disclosure of environmental, social and governance risks (ESG risks)	Template 10	Other climate change mitigating actions that are not covered in Regulation (EU) 2020/852	Not applicable as on hold – ref EBA no Action letter (EBA-2025-D-5275) of 5-August-2025
Guidelines on uniform disclosures under Article 473a of Regulation (EU) No 575/2013 as regards the transitional period for mitigating the impact of the introduction of IFRS 9 on own funds (EBA/GL/2018/01)	IFRS 9-FL	Comparison of institutions' own funds and capital and leverage ratios with and without the application of transitional arrangements for IFRS 9 or analogous ECLs	Tab 1.2
Final Draft Implementing Technical Standards amending the ITS on disclosures and reporting on MREL and TLAC with regard to the disclosures and reporting of information on daisy chains and prior permissions (EBA/Rep/2023/41)	EU KM2	Key metrics - MREL and, where applicable, G-SII requirement for own funds and eligible liabilities	Tab 1.3

Glossary		Bank of Ireland Group plc
Advanced IRB	Advanced Internal Ratings Based approach. The approach which allows banks to calculate their capital requirement for credit risk for their retail and non-retail portfolios using their own internally generated estimates of PD, LGD and CCF. These variables are then fed into a standard formula to calculate the capital requirement for the asset. Referred to as Retail IRB in this document.	
Banking Book	The Banking Book consists of all banking assets, liabilities and derivatives other than those held with trading intent and booked on this basis in the Trading Book.	
CRD	The CRD package transposes, via a Regulation and a Directive, the new global standards on bank capital (commonly known as the Basel III agreement) into the EU legal framework. The Capital Requirements Directive and the Capital Requirements Regulation were published in the Official Journal of the EU in June 2013 (also called CRD / CRR) and have been subsequently updated. The legislation involves phased implementation.	
Collateral	Property or assets made available by a borrower as security against a loan. Under a collateralisation arrangement, a party who has an obligation to another party posts collateral (typically consisting of cash or securities) to secure the obligation. In the event that the counterparty defaults on the obligation, the secured party may seize the collateral.	
Counterparty Credit Risk	Counterparty credit risk (CCR) means the risk that the counterparty to derivatives and security finance transactions could default before the final settlement of the transaction's cash flows.	
Credit Conversion Factor (CCF)	An estimate of the proportion of undrawn commitments expected to be drawn down at the point of default. The CCF is expressed as a percentage and is used in the calculation of Exposure at Default (EAD).	
Credit Risk Standardised Approach	A method for calculating risk capital requirements using ECAI ratings (where available) and supervisory risk weights.	
Credit Risk Mitigation	A technique to reduce the credit risk associated with an exposure by the application of credit risk mitigants such as collateral, guarantees and credit protection.	
Derecognition	The removal of a previously recognised financial asset or financial liability from an entity's balance sheet.	
EBA	The European Banking Authority, formerly CEBS (the Committee of European Banking Supervisors).	
Expected Loss	A regulatory calculation of the amount expected to be lost on an exposure using a twelve month time horizon and downturn loss estimates. Expected loss is calculated by multiplying the Probability of Default (a percentage) by the Exposure at Default (an amount) and Loss Given Default (a percentage).	
External Credit Assessment Institution (ECAI)	An eligible External Credit Assessment Institution (ECAI) is an entity, other than an Export Credit Agency, that issues external credit assessments, and that has been determined by the competent authorities to meet the eligibility requirements set out in the Capital Requirements Directive. The credit assessment provided by the ECAI is used to provide a basis for capital requirement calculations in the Standardised approach for securitisation positions as well as an input into the IRB Institutions model. Further information on the use of ECAIs under the Standardised approach for other asset classes has not been disclosed due to immateriality.	
Exposure at Default (EAD)	The estimated value of the bank's exposure at the moment of the borrower's default determined under regulatory rules.	
Exposure Weighted Average (LGD)	Calculating the exposure weighted average LGD involves multiplying the exposure values by the relevant LGD, summing the answers and dividing by the total exposure values.	
Exposure Weighted Average (PD)	Calculating the exposure weighted average PD involves multiplying the exposure values by the relevant PD, summing the answers and dividing by the total exposure values.	
Financial collateral comprehensive method	Takes into account price and volatility when valuing financial collateral for the purpose of credit risk mitigation.	
Foundation IRB	The approach where institutions use their own estimates of PD to calculate risk weights for each exposure. Supervisory estimates of LGDs and EADs are used.	
GMRA	Global Master Repurchase Agreements, are standard industry agreements that permit the netting and the collateralisation of repo type transactions.	
Gross carrying amount	The gross carrying amount related to the exposures subject to impairment is the net of accumulated partial and total write-off.	
Gross non-performing loans and advances (NPL) ratio	The gross NPL ratio is the ratio of the gross carrying amount of NPLs and advances to the total gross carrying amount of loans and advances subject to the NPE definition. For the purpose of this calculation, loans and advances classified as held for sale, cash balances at central banks and other demand deposits are to be excluded both from the denominator and from the numerator.	
IFRS	International Financial Reporting Standards.	
Internal Ratings Based Approach (IRB)	Approach to credit risk under which a bank may use internal estimates to generate risk components for use in the calculation of their credit risk regulatory capital requirements. There are two approaches: Foundation and Advanced (including Retail).	
Immateriality	The CRD permits non-disclosure where the information to be provided is not regarded as material. Information is deemed to be material under the CRD if its omission or misstatement could change or influence the assessment or decision of a user relying on that information for the purposes of making an economic decision. Any required items left out of this document due to immateriality are referenced in the relevant section of this document.	
IRB Exposure Classes	<p>• <i>Institutions:</i> Exposures to Financial Institutions authorised and supervised by the competent authorities and subject to prudential requirements. Includes exposure to Covered Bonds.</p> <p>• <i>Corporates:</i> CRD does not provide a definition of the corporate exposure class; it simply provides that any exposure not falling into any of the other exposure classes will be allocated to the corporate exposure class.</p> <p>• <i>Secured by immovable property collateral:</i> Residential mortgages.</p> <p>• <i>Qualifying revolving:</i> <i>The exposures (to individuals) are revolving and unsecured. Primarily comprises of credit cards.</i></p> <p>• <i>Securitisation positions:</i> Exposures belonging to a pool - as defined below under securitisation.</p>	
ISDA	ISDA is the International Swaps and Derivatives Association. ISDA Agreements are standard industry agreements issued by ISDA which permit the netting of derivative transactions.	
Leverage Ratio	The leverage ratio is a monitoring tool which allows competent authorities to assess the risk of excessive leverage in their respective institutions.	
Loss Given Default (LGD)	The likely financial loss associated with default, net of collections / recovery costs and realised security.	
Mark-to-Market (MTM)	The act of recording the price or value of a security, portfolio or account to reflect its current market value rather than its book value.	
Market Risk Standardised Approach	The Standardised approach to the determination of Pillar 1 capital for market risk in the trading book involves estimating a minimum required capital charge based on the difference in the re-pricing periods for assets, liabilities and derivatives (treated as equivalent on-balance sheet assets and liabilities). In addition, depending on the nature of the positions, it also provides for a specific risk charge. The total minimum capital charge is converted to a risk weighted asset equivalent for the trading book which is summed with other risk weighted assets in determining overall regulatory capital ratios.	
Minimum capital requirements	8% of RWA	

Net Value	Net value is the gross carrying value (pre CRM and CCF) of On and Off balance sheet exposures less specific credit risk adjustments (value adjustments and provisions per COREP including the Article 3 calendar provisioning).
Non-performing exposure (NPE)	'Non-performing exposures' (NPEs): These are: (i) credit-impaired loans which includes loans where the borrower is considered unlikely to pay in full without recourse by the Group to actions such as realising security, including FCR cases, and loans where the borrower is greater than 90 days past due and the arrears amount is material; and (ii) other / probationary loans that have yet to satisfy exit criteria in line with EBA guidance to return to performing.
Off Balance Sheet	Off balance sheet items include undrawn commitments to lend, guarantees, letters of credit, acceptances and other items as listed in Annex I of the CRR.
Operational Risk Standardised Approach	The Pillar 1 approach which allows banks to calculate their capital requirement in respect of operational risk by multiplying the gross income from each business line by the relevant factor specified in respect of that business line (as set out in CRD).
Originator	An entity which, either itself or through related entities, directly or indirectly, was involved in the original agreement which created the obligations or potential obligations of the debtor or potential debtor giving rise to the exposure being securitised; or an entity which purchases a third party's exposures onto its balance sheet and then securitises them.
Probability of Default (PD)	The likelihood that a debt instrument will default within a stated timeframe (For CRD this is a twelve month time horizon). For example, the probability of default of a certain loan is 2%; this means that there are 2 chances out of 100 that the borrower will default in the next 12 months.
Regulatory Basis	The application of the requirements in accordance with competent authority application of transitional provisions.
Risk Exposure Amounts (REA)	Risk Exposure Amount refers to an amount in respect of which capital requirements arise under CRR and is used interchangeably in this document with RWA. REA is used in the calculation of risk-based capital ratios. Total assets are calculated by applying predetermined calculations (set by the regulators) to the nominal outstanding amount of each on-balance sheet asset and the notional principal amount of each off-balance sheet item and incorporating risk weighted factors.
RWA Density (%) Securitisation	Total REA divided by Total EAD post CRM. Converting an asset such as a loan into a marketable commodity by turning it into securities. Assets are pooled and sold, often in unitised form, enabling the lender to reliquary the asset. Any asset that generates an income stream can be securitised - i.e. mortgages, car loans, credit-card receivables.
Settlement Risk	The risk to which a bank is exposed on certain transactions unsettled after their due date.
Stage 1	Stage 1 - 12 month Expected Credit Losses (ECL) (not credit-impaired). Financial instruments which have not experienced a significant increase in credit risk since initial recognition and are not credit-impaired. An impairment loss allowance equal Stage 1 - 12 month ECL is recognised, which is the portion of lifetime ECL resulting from default events that are possible within the next 12 months.
Stage 2	Stage 2 - Lifetime ECL (not credit-impaired). Financial instruments which have experienced a 'significant increase in credit risk since initial recognition' and are not credit-impaired. An impairment loss allowance equal to lifetime ECL is recognised, being the ECL resulting from all possible default events over the expected life of the financial instrument. 'Credit risk' in this context refers to the change in the risk of a default occurring over the expected life of the financial instrument.
Stage 3	Stage 3 - Lifetime ECL (credit-impaired). Credit-impaired financial instruments, other than Purchased or originated credit-impaired financial assets. An impairment loss allowance equal to lifetime ECL is recognised. The manner in which the Group identifies financial assets as credit-impaired results in the Group's population of credit-impaired financial assets being consistent with its population of defaulted financial assets (in accordance with Article 178 of the CRR) in scope for the impairment requirements of IFRS 9. This encompasses loans where: (i) the borrower is considered unlikely to pay in full without recourse by the Group to actions such as realising security (including 'forborne collateral realisation' (FCR) loans); and / or (ii) the borrower is greater than 90 days past due and the arrears amount is material.
SME	Small Medium Enterprise is defined as an enterprise which employs fewer than 250 people and whose annual turnover is less than €50 million, or annual balance sheet total less than €43 million.
Specific Outlier Test (SOT)	SOTs are a supervisory tool which assess whether exposures to IRRBB have an impact on an institution's economic value of equity or net interest income beyond specific thresholds.
Standardised Exposure Classes	<ul style="list-style-type: none">• <i>Central governments or central banks:</i> Exposures to countries and their central banks receive risk weights based on their credit ratings.• <i>Regional Governments and Local Authorities:</i> Exposures to these entities are treated similarly to central government exposures• <i>Public Sector Entities (PSEs):</i> Exposures to Public Sector Entities and non-commercial undertakings.• <i>Multilateral Development Banks (MDBs):</i> Exposures to MDBs who are international financial institutions established by multiple member countries to promote economic and social progress in developing nations.• <i>International Organisations (IOs):</i> exposures to los who have formal structures established by treaties or other agreements between three or more states to pursue shared goals, operating across national borders.• <i>Institutions:</i> Exposures to Financial Institutions authorised and supervised by the competent authorities and subject to prudential requirements.• <i>Retail:</i> Exposures must be to an individual person or person or to a small or medium sized entity. It must be one of a significant number of exposures with similar characteristics such that the risks associated with such lending are substantially reduced and, the total amount owed, shall not, to the knowledge of the credit institution, exceed €1 million.• <i>Corporates:</i> In general, a corporate exposure is defined as a debt obligation of a corporate, partnership or proprietorship.• <i>Secured by mortgages on immovable property and ADC exposures:</i> Exposures secured by residential or commercial real estate including acquisition, development and construction.• <i>Exposures in default:</i> Where the exposure is past due more than 90 days or unlikely to pay.• <i>Subordinated debt exposures:</i> Exposures associated with subordinated debt and highly risk items.• <i>Institutions and Corporates with short-term credit assessment:</i> Exposures for which a short-term credit assessment by a nominated ECAI is available.• Collective investment undertakings (CIU): Exposures in the form of units or shares in funds are subject to separate treatment.• Equity: <i>exposures to</i> Equity investments in other entities.• <i>Other items:</i> Exposures not falling into the other exposure classes outlined above.
Trading Book	A trading book consists of positions in financial instruments and commodities held either with intent to trade, or in order to hedge other elements of the Trading Book. To be eligible for trading book capital treatment, financial instruments must either be free of any restrictive covenants on their tradability, or are able to be hedged completely.
Through-the-Cycle PD (TiC PD)	A version of the Probability of Default measure engineered to estimate the average one-year probability of default over an economic cycle. For example, if the TiC PD of a certain loan is 2% this means that there is, on average over an economic cycle, a 2 in 100 chance that the borrower will default in any given year.

Abbreviations

Bank of Ireland Group plc

1LOD	First Line of Defence
2LOD	Second Line of Defence
3LOD	Third Line of Defence
ACS	Asset Covered Securities
ADC	Acquisition, Development and Construction
A-IRB/AIRB	Advanced Internal Ratings-Based Approach
ALCO	Asset and Liability Committee
AMA	Advanced Measurement Approach
AML	Anti-Money Laundering
ASA	Alternative Standardised Approach
ASF	Available Stable Funding
AT1	Additional Tier 1 capital
AVA	Additional Valuation Adjustments
B2DS	Beyond 2 Degrees Scenario
BCBS 239	The Basel Committee on Banking Supervision, Principles for effective risk data aggregation and risk reporting
BEEL	Best Estimates of Expected Loss
BER	Building Energy Rating
BIA	Basic Indicator Approach
BoE	Bank of England
BOI	Bank of Ireland
BoIG	Bank of Ireland Group plc
BoIGM	Bank of Ireland Global Markets
BoIMB	Bank of Ireland Mortgage Bank
bp	Basis Point
BRC	Bord Risk Committee
BRR	Board Risk Report
BRRD	Bank Recovery and Resolution Directive
BSSRC	Balance Sheet Structural Risk Committee
BTL	Buy to Let
C&E	Climate and other environment
CAI	Climate Accountability Institute
CBI	Central Bank of Ireland
CCA	Climate Change Adaption
CCF	Credit conversion factor
CCM	Climate Change Mitigation
CCP	Central Counterparty Clearing
CCR	Counterparty credit risk
CCY	Currency
CCyB	Countercyclical Capital Buffer
CDEAs	Cleared Derivatives Execution Agreements
CDP	Carbon Disclosure Project
CEO	Chief Executive Officer
CET 1	Common equity tier 1 capital
CFI	Community Foundation for Ireland
CFO	Chief Financial Officer
CFT	Countering the Financing of Terrorism
CMBS	Commercial Mortgage-Backed Securities
CRD	Capital Requirements Directive
CRE	Commercial Real Estate
CRM	Credit risk mitigation
CRO	Chief Risk Officer
CRR	Capital Requirements Regulation
CSA	Credit support annex
CSIRO	Chief Sustainability and Investor Relations Officer
CSRD	Corporate Sustainability Reporting Directive
CVA	Credit valuation adjustment
DCF	Discounted Cash Flow
DMA	Double Materiality Assessment
DNSH	Do No Significant Harm
DRP	Directors' Remuneration Policy
EAD	Exposure at default
EBA	European Banking Authority
ECAI	External Credit Assessment Institutions
ECB	European Central Bank
ECL	Expected credit loss
EHQLA	Encumbered High Quality Liquid Asset
EL	Expected loss
ELBE	Expected loss best estimate
EMIR	European Market Infrastructure Regulation
EP	Energy Performance
EPC	Energy Performance Certificate
ERBA	External Ratings Based Approach
ERC	Executive Risk Committee
ERU	Economic Research Unit
ESG	Environmental, Social and Governance
ESMA	European Securities and Markets Authority
ETP	Energy Transition Pathway
EU	European Union
EUR	EURO
EURIBOR	Euro Inter Bank Offered Rate
EV	Electric Vehicle
EVE	Economic Value of Equity
F&P	Fitness and Probity
FCA	Financial Conduct Authority
FCC	Financial Crime Compliance
FCCM	Financial collateral comprehensive method
FCR	Forborne collateral realisation
FCs	Financial Counterparties
FINREP	Financial Reporting
F-IRB/FIRB	Foundation Internal Ratings-Based Approach
FLI	Forward Looking Information
FSQS	Financial Supplier Qualification System
FVOCI	Fair Value through Other Comprehensive Income
FVTPL	Fair Value Through Profit and Loss
FWP	Financial Wellbeing Programme
FX	Foreign Exchange
FY	Financial Year
GAC	Group Audit Committee
GAR	Green Asset Ratio
GBP	Pound Sterling
GCRC	Group Credit Risk Committee
GCTC	Group Credit Transactions Committee
GEC	Group Executive Committee
GHG	Greenhouse gas
GIA	Group Internal Audit
GMCLR	Group Market, Capital & Liquidity Risk
GMRA	Global master repurchase agreement
GORC	Group Operational Risk Committee
GovCo	The Governor and Company of the Bank of Ireland
GPS	Group Performance Scheme
GRC	Group Remuneration Committee
GRCRC	Group Regulatory and Conduct Risk Committee
GRP	Group Remuneration Policy
GSC	Group Sustainability Committee
G-SII	Global Systemically Important Institution
GTOC	Group Transformation Oversight Committee
HLBA	Historical Look Back Approach
HQLA	High quality liquid assets
I&D	Inclusion and Diversity

IAA	Internal Assessment Approach
IAF	Individual Accountability Framework
ICAAP	Internal Capital Adequacy Assessment Process
IEA	International Energy Agency
IFRS	International Financial Reporting Standards
ILO	International Labour Organisation
IMA	Internal Models Approach
IMM	Internal Models Method
IPRE	Income Producing Real Estate
IRB	Internal Ratings-Based
IRBA	Internal Ratings Based Approach
IRRBB	Interest Rate Risk in Banking Book
IRS	Interest rate swaps
ISDA	International Swaps and Derivative Association
ISO	International Organisation for Standards
IVU	Independent Valuation Unit
KMP	Key management personnel
KPI	Key Performance Indicators
LCR	Liquidity coverage ratio
LDR	Loan to Deposit Ratio
LGD	Loss given default
LR	Leverage Ratio
MDB	Multilateral development bank
MEL	Maximum Exposure Limit Framework
MI365	Money Insights 365
MLRO	Money Laundering Reporting Officer
MRC	Model Risk Committee
MREL	Minimum Requirement for own funds and eligible liabilities.
MRM	Management Reporting Metrics
MRT	Material Risk Takers
MTM	Mark-to-market
N&G	Nomination & Governance
NACE	Nomenclature of Economic Activities
NED	Non-Executive Directorship
NFRD	Non-Financial Reporting Directive
NIAC	New Ireland Assurance Company
NPE	Non-performing exposures
NPL	Non-Performing Loans
NSFR	Net Stable Funding Ratio
NZEB	Nearly Zero-Energy Buildings
OCI	Other Comprehensive Income
OECD	Organisation for Economic Co-operation and Development
ORSA	Own Risk and Solvency Assessment
O-SII	Other Systemically Important Institutions
OTC	Over-the-counter
PBAF	Partnership for Biodiversity Accounting Financials
PCAF	Partnership for Carbon Accounting Financials)
PD	Probability of default
PERC	Private Equity Risk Committee
PFE	Potential future exposure
PIT	Point-in-time
PMA	Post Model Adjustment
POCI	Purchased or Originated Credit-impaired
PRA	Prudential Regulation Authority
PSE	Public sector entity
PVA	Prudent valuation adjustment
QCCP	Qualifying central counterparty
QRRE	Qualifying revolving retail exposure
RAG	Red Amber Green
RAROC	Risk Adjusted Return on Capital
RCF	Revolving Credit Facilities
RCSA	Risk and Control Self-Assessment
REAU	Real Estate Advisory Unit
Retail IRB	Retail Internal Ratings Based Approach
RMBS	Residential Mortgage-Backed Securities
RMC	Risk Measurement Committee
RMF	Risk Management Framework
ROI	Republic of Ireland
RoTe	Return on Tangible Equity
RPPI	Residential Property Price Index
RRE	Residential Real Estate
RSF	Required Stable Funding
RW	Risk Weight
RWEA/RWA	Risk weighted exposure amounts
S&P	Standard and Poor
SA-CCR	Credit Counterparty Risk using the Standardised Approach
SBT	Science Based Targets
SBTi	Science Based Targets Initiative
SDA	Sectoral Decarbonisation Approach
SDG	Sustainable Decision Group
SDGs	Sustainable Development Goals
SE	Structured Entity
SEAI	Sustainable Energy Authority of Ireland
SEAR	Senior Executive Accountability Regime
SEC-IRBA	Securitisation Internal Ratings Based Approach
SEC-ERBA	Securitisation External Ratings Based Approach
SFT	Securities financing transactions
SID	Senior Independent Director
SMBPN	Special Mortgage-Backed euro Promissory Note
SMCR	Senior Managers and Certification Regime
SME	Small Medium Enterprise
SONIA	Sterling Overnight Index Average
SREP	Supervisory Review and Evaluation Process
SRT	Significant Risk Transfer
SSM	Single Supervisory Mechanism
SSPEs	Securitisation Single Purpose Entity
STS	Simple Transparent and Standardised
SVaR	Stressed Value at Risk
T2 Capital	Tier 2 Capital
TCND	Taskforce for Nature Related Financial Disclosures
TFCD	Taskforce for Climate Related Financial Disclosures
TLAC	Total loss absorbing capacity
TPRM	Third Party Risk Management
TREA	Total Risk exposure amounts
TSA/SA	The Standardised Approach
TtC	Through-the-cycle
UK	United Kingdom
UNPRB	United Nations Principles for Responsible Banking
UNPRI	United Nations Principles for Responsible Investment
UoP	Use of Proceeds
USD	US Dollar
VaR	Value at risk
WACI	Weighted Average Carbon Intensity
WWR	Wrong Way Risk

[Previous](#)[Index](#)