

Disclosure under the CRR

ASSOCIATION OF VOLKSBANKS

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1 General information on disclosure

This document serves to fulfil the requirements pursuant to Regulation (EU) No. 575/2013 (CRR) and Directive 2013/36/EU (CRD IV) for the association of credit institutions under Section 30a of the Austrian Banking Act (BWG) of the Volksbanks (Association of Volksbanks) by VOLKSBANK WIEN AG as central organisation (CO).

1.1. Disclosure obligations and procedures

CRR Art 431

The Association of Volksbanks fulfils the requirements pursuant to Regulation (EU) No. 575/2013 and Directive 2013/36/EU of the European Parliament and of the Council on the basis of the consolidated financial position of the credit institution group as at the reporting date 31 December 2024. All quantitative data are in thousands of euros unless otherwise stated.

A formal procedure exists at VOLKSBANK WIEN AG to ensure the correct fulfilment of disclosure obligations. This procedure is set down in writing in a disclosure framework, which is reviewed at least annually for up-to-dateness and completeness and approved by the Managing Board.

The framework describes the required minimum quantitative and qualitative content for each disclosure requirement, defining the responsibilities for preparing the disclosure content and the required review steps. Before each disclosure date, each responsible person checks whether there is relevance for the disclosure of certain content (e.g. securitisations, internal models, foreign branches). This procedure ensures that the relevant disclosure content is made available to market participants in the disclosure report in a complete and comprehensible manner.

To ensure correct disclosure that is consistent with other reports, three-stage quality assurance is embedded in the disclosure process. The initial topic-specific quality assurance is performed by the organisational unit responsible for the respective disclosure topic. The second stage of quality assurance is carried out as part of the process of compiling the content in the disclosure report. The focus is on completeness and cross-topic consistency. The third and final stage is the final reconciliation between the disclosure report and the Annual Report.

The Chief Financial Officer (CFO) approves the disclosure report for publication.

1.2. Non-essential information, business secrets or confidential information

CRR Art 432

The Association of Volksbanks generally publishes all information required under Part 8 CRR. Exceptions to this rule will be considered on a case-by-case basis, taking into account the guidelines published by the EBA.

1.3. Frequency of disclosure

CRR Art 433

The CRR II has clearly defined the principle of proportionality. The scope and reporting frequency of disclosure depend on the size and complexity of institutions and are described in Articles 433, 433a, 433b and 433c of the CRR.

As A-SRI, the Association of Volksbanks is classified as a "large institution"; hence, the frequency and scope of disclosure are defined pursuant to CRR Art 433a.

The content to be disclosed annually as at the end of the year is published separately by qualitative content and standardised quantitative content in two separate documents. During the year, the scope is smaller and predominantly quantitative, so quantitative disclosure is in the form of Excel spreadsheets.

1.4. Means of disclosure

CRR Art 434

Disclosure in accordance with Chapter 8 of the CRR is made for the Association of Volksbanks on the website of VOLKSBANK WIEN AG as the central organisation (CO).

2 Risk management and governance

2.1 General information on risk management

CRR Art 435(1); EU OVA

Assuming and professionally managing the risks associated with the business activities is a core function of every bank. In its capacity as central organisation (CO) of the Association of Volksbanks under Section 30a of the Austrian Banking Act, consisting of VBW and the affiliated banks of the Volksbank Sector, VOLKSBANK WIEN AG (VBW) performs this central task for the Association of Volksbanks, so that the latter has in place administrative, accounting and control procedures for the recognition, assessment, management and monitoring of the risks associated with banking transactions and banking operations as well as of the remuneration strategy and practices (Section 39 (2) of the Austrian Banking Act). The implementation of control within the Association of Volksbanks is effected through General, and, if necessary, Individual Instructions and corresponding working instructions in the affiliated banks.

The following risks are classified as material within the Association of Volksbanks in the course of the risk inventory process:

- Credit risks
- Market risks
- Liquidity risks
- Operational risks
- Other risks (e.g. strategic risk, equity risk, sustainability risks)

Risk policy principles

The risk policy principles of the Association of Volksbanks comprise the standards for the management of risks that are applicable within the Association of Volksbanks and are defined by the CO Managing Board together with the risk appetite. A common set of rules and understanding of risk management across the Association is the basis for developing risk awareness and a risk culture within the company. The Association of Volksbanks carries on its activities subject to the principle that risks will only be accepted to the extent this is required to achieve strategic business goals. The associated risks are managed under an overall perspective subject to risk management principles by creating an appropriate organisational structure and corresponding business processes.

Organisation of risk management

The Association of Volksbanks has taken all required organisational precautions to meet the requirements regarding modern risk management. There is a clear separation between front office and back office. A central, independent risk control function has been established. At managing board level, the Chief Risk Officer (CRO) is the head of Risk Control. Within the managing board responsibilities of the CRO, there is a separation between risk control and operational credit risk management. Risk assessment, risk measurement and risk control are carried out according to the dual-control principle. For the purpose of avoiding conflicts of interest, these tasks are performed by different organisational units.

The business model requires risks to be identified, assessed, measured, aggregated and controlled effectively. Risks and capital are managed by means of a framework of principles, organisational structures as well as measuring and monitoring processes that are closely aligned with the activities of the departments and divisions. As a prerequisite and basis for sound risk management, the Risk Appetite Framework (RAF) for the Association of Volksbanks is continuously refined to define the risk appetite or the degree of risk tolerance that the Association of Volksbanks is willing to accept in order to achieve its defined objectives. The level of risk tolerance manifests itself in the definition and monitoring of appropriate limits and controls, in particular. The framework is verified and developed with respect to regulatory requirements, changes

of the market environment or the business model on a current basis. The Association of Volksbanks aims to develop, by way of this framework, a disciplined and constructive control environment where all employees understand and live up to their role and responsibility.

Within the Association of Volksbanks, risks are controlled by three decision-making bodies at VBW: (i) Risk Committee (RICO), (ii) Asset Liability Committee (ALCO), (iii) Credit Committee (CC). The responsibilities of these committees include both subject areas of VBW as a single institution and matters concerning the entire Association of Volksbanks pursuant to Section 30a Austrian Banking Act. Risk reporting in the affiliated banks takes place in the respective local boards.

The RICO serves to control all material risks, with a focus at portfolio level, ensuring that risk policy decisions are in compliance with risk appetite. The aim is to provide the Managing Board of VBW with a comprehensive view of all risks (aggregate bank risk report) and with a summary of regulatory and other risk-relevant topics.

The ALCO is the central body for controlling interest rate, foreign currency and liquidity risks, as well as investment risks through positions in the banking book, with a view to optimising risk and return, and to securing refinancing in the long term.

The CC is the body responsible for credit decisions based on applicable definitions of responsibilities, for approving action plans for customers undergoing restructuring or debt enforcement, as well as for approving allocations to individual allowances for impairment, provisions and waivers.

Additionally, a sustainability committee (NAKO) with the power to adopt resolutions was set up for reporting purposes and to manage key sustainability topics.

Risk management across the Association

The Risk Control function of VBW as CO is responsible for risk governance, methods and models for strategic risk management issues across the Association, as well as the regulations for control at portfolio level. For the purpose of performing its steering function, the CO has issued General Instructions (GI) for the affiliated banks. The GI RAF (Risk Appetite Framework), GI ICAAP, GI ILAAP, GI Principles of Credit Risk Management (GI PCRM) and the downstream manuals of the Association and the associated working instructions govern the risk management function in a binding and uniform manner. The risk strategy for the Association of Volksbanks is also issued in the form of a GI including a pertinent manual of the Association. The aim is to comprehensively and verifiably document and set down general conditions and principles, consistently throughout the Association, for the assessment and management of risks, and for the creation of processes and organisational structures. Within the scope of their general duty of care, the members of the managing board and the managing directors of all affiliated banks must ensure, without exception and restriction, in the interest of the respective companies, that the General Instructions are put into effect both formally and de facto. Any deviations and special regulations concerning the General Instructions shall only be permissible in exceptional cases and must be coordinated with VBW as the CO in advance, and approved by the latter.

Within the Association of Volksbanks, comprehensive communication about risks and a direct exchange of information is considered extremely important. In order to allow for professional exchange in a working context, an RMF Jour Fixe (expert committee) was set up. Each affiliated bank must dispose of its own Risk Management Function (RMF) that is responsible for the independent monitoring and communication of risks within the respective affiliated bank.

Risk governance as well as the methods and models are regularly refined and adjusted to currently prevailing basic conditions by the Risk Control unit of VBW as CO. Apart from regular remodelling, recalibration and validation of the risk models, the methods in the ICAAP & ILAAP are being improved continuously, with new regulatory requirements being monitored and implemented in a timely fashion.

Internal Capital Adequacy Assessment Process

To ensure a sustainable, risk-adequate capital base, VBW, in its capacity as CO of the Association of Volksbanks, has set up an Internal Capital Adequacy Assessment Process (ICAAP) as a revolving control cycle, in line with international best practices. The ICAAP starts by identifying the risks material for the Association of Volksbanks, followed by a risk quantification and aggregation process, determination of risk-bearing capacity, limitation, and concludes with ongoing risk monitoring and the measures derived therefrom. Explanations regarding the ILAAP are presented in the item Liquidity risk.

The individual elements of the cycle are performed at varying intervals (e.g. daily for market risk / trading book risk measurement, quarterly for preparing the risk-bearing capacity calculation, annually for the risk inventory and the determination of the risk strategy). All the activities described within the cycle are reviewed for up-to-dateness and adequacy at least annually, and adjusted to the respective current environment if necessary; they are approved by the Managing Board of the CO. ESG (E=Environment, S=Social, G=Governance) and sustainability risks have been integrated into the internal capital adequacy process over recent years by taking ESG risks into account in all elements of the internal capital adequacy process. ESG risks were not included as a separate risk type, but were mapped within the existing risk types. The methods, models and strategies used will be continuously developed and are meant to contribute to successively measuring inherent ESG risks more accurately.

Risk inventory

The risk inventory process aims to define the materiality of existing and newly assumed banking risks. The findings from the risk inventory process are collected, analysed for the Association of Volksbanks and summarised in a risk inventory. The results of the risk inventory process are used to inform the risk strategy and form a starting point for the risk-bearing capacity calculation, as material risks are taken into account within the risk-bearing capacity calculation.

Additionally, ESG risks are analysed and assessed annually as part of the risk inventory using ESG heat maps. The ESG heat map is a tool to identify, analyse and assess the materiality of ESG risks and/or their risk drivers. In the ESG heat map, various risk events are described and evaluated for all relevant risk types of the Association of Volksbanks. The findings are then mapped in the risk inventory within the framework of existing risk types.

Risk strategy

The risk strategy of the Association is based on the business strategy of the Association and provides for consistent general conditions and principles for uniform risk management. The risk strategy is reviewed for up-to-dateness and adequacy at least annually and adjusted to the respective current general conditions. It provides the rules for the management of risks and ensures risk-bearing capacity within the Association of Volksbanks at all times. The risk strategy is prepared in the course of business planning. The contents of the risk strategy and of the business planning of the Association of Volksbanks are linked up by incorporating the targets of the Risk Appetite Statement in the GI Strategy, Planning and Reporting.

The Association of Volksbanks is committed to a sustainable corporate culture and strives to establish ESG aspects in all areas of the company. The risk strategy also includes a sub-risk strategy for ESG risks. It maps the ESG risks inherent in the existing risk types, which can be derived from the ESG heat maps and the internal stress test.

The local or individual risk strategies of the affiliated banks of the Association of Volksbanks essentially build on the risk strategy of the Association, defining regional specifications and local specifics. The preparation of the local risk strategies of the affiliated banks is supported and checked for conformity with the risk strategy of the Association by the CO, who also provides quality assurance in this respect. The Association's risk strategy manual, which is valid throughout the Association of Volksbanks and includes the local risk strategy, is adopted by each affiliated bank.

Risk Appetite Statement (RAS) and limit system

The core element of the risk strategy is a Risk Appetite Statement (RAS) and integrated limit system in line with the business strategy. The RAS set of indicators comprising strategic and deepening indicators helps the Managing Board of the CO to implement central strategic goals of the Association of Volksbanks, specifying the same in operational terms. Moreover, a comprehensive set of additional RAS indicators is considered regularly.

The risk appetite, i.e. the indicators of the RAS, is derived from the business model, the current risk profile, the risk capacity and the earnings expectations and/or the strategic planning process. The limit system broken down by risk subtypes and the RAS provide the framework for the maximum risk that the Association of Volksbanks is ready to accept to achieve its strategic targets. As a rule, the RAS indicators are provided with a target, a trigger and a limit value and are monitored on a current basis, as are the aggregate bank and partial risk limits. In this way, it can be ensured that deviations from the risk strategy are identified swiftly and that countermeasures can be initiated in a timely manner. The RAS set of indicators is essentially made up of the following strategic and more detailed RAS indicators:

- Capital-based ratios (e.g. CET1 capital ratio, T1 ratio, TC ratio, utilisation of risk-bearing capacity)
- Credit risk ratios (e.g. NPL ratio, coverage ratio, foreign customer exposure, forbearance ratio, sector concentrations)
- Market/liquidity risk ratios (e.g. LCR, NSFR, survival period, asset encumbrance ratio, interest rate coefficients)
- Ratios relating to operational risk (e.g. OpRisk losses in proportion to CET1, ICS implementation rate)
- Other risk-relevant ratios (e.g. cost-income ratio, leverage ratio, compliance risk, IT system availability)

Since 2024, ratios with an ESG focus (physical risks or portfolio coverage of ESG Scores) have been integrated in the RAS set of indicators.

Risk-bearing capacity calculation

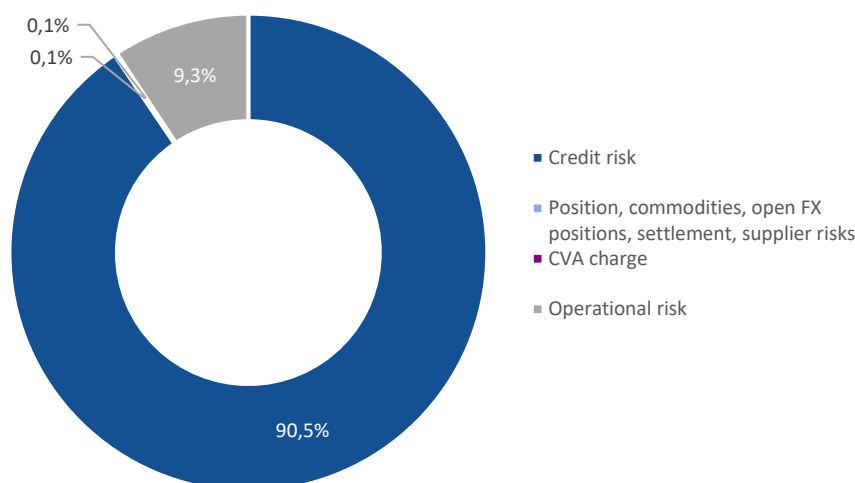
The risk-bearing capacity calculation constitutes a central element within the implementation of the ICAAP. It is used to provide evidence of the fact that the risks assumed are sufficiently covered by adequate internal capital at all times and to ensure such cover in future. For this purpose, all relevant individual risks are aggregated. This total risk is then compared to the existing and previously defined risk covering potentials. Compliance with the limits is monitored and reported on quarterly.

In determining risk-bearing capacity, different objectives are pursued that are reflected in three perspectives:

- Regulatory perspective (compliance with regulatory own funds ratios)
- Economic perspective
- Normative perspective

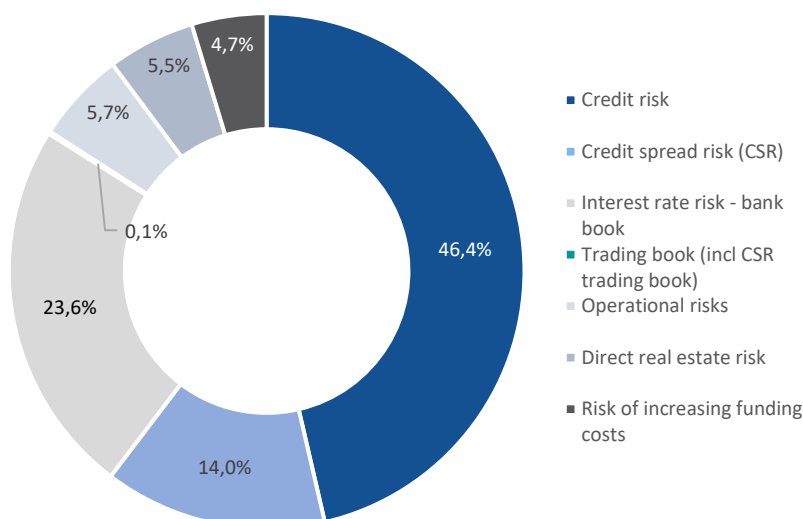
The regulatory Pillar 1 perspective compares the total risk exposure amount calculated in accordance with applicable legal provisions with regulatory own funds. Ensuring regulatory risk-bearing capacity is stipulated under the law and constitutes a minimum requirement. The composition of the regulatory total risk exposure of the Association of Volksbanks corresponds to that of any regionally active retail bank.

The distribution of risks from a regulatory perspective is the following as at 31 December 2024:



The economic perspective contributes to ensuring the continued existence of the Association of Volksbanks by foregrounding the economic value within the assessment of capital adequacy. The risk-bearing capacity under the economic perspective derives from a comparison of economic risks with internal capital (risk covering potential). Economic risks are risks that may impair the economic value of the institution, and accordingly may impair the adequacy of the capital base under an economic perspective. During the quantification of economic risks, internal procedures – normally “value at risk” (VaR) – with a confidence level of 99.9 % and a time horizon of one year are resorted to. In doing so, all quantifiable risks are taken into account that were identified as material within the scope of the risk inventory process. Own funds available for loss absorption upon continuation of business activities (usually CET1 capital) as well as the result achieved in the current financial year, reduced by deductions for strategic risks, any hidden burdens and any distribution requirements are recognised as risk covering potential. The aggregate bank risk limit is set at 95 % of available internal capital. A prerequisite for capital adequacy from an economic perspective is for internal capital to be sufficient to cover the risks and to support the strategy on an ongoing basis.

As at 31 December 2024, the distribution of risks from an economic perspective is the following:



The normative perspective ensures that the Association of Volksbanks is able, throughout a period of several years, to meet its own funds requirements and to cope with other external financial constraints. It represents the risk-bearing capacity on the basis of strategic planning under normal and adverse conditions, essentially comprising a simulation of income statement and own funds items over three years. In the process, the strategic planning as well as various crisis scenarios are simulated and the development of regulatory own funds ratios calculated taking into account the effects of the relevant scenario. Therefore, the key parameters of the normative perspective are the regulatory own funds ratios CET1, Tier 1 and total capital.

Stress testing

For credit, market and liquidity risks, as well as for operational risk, risk-type-specific stress tests and/or risk analyses are performed regularly, with crisis scenarios being conceived in such a way that the occurrence of operational risk events that are highly unlikely, but not impossible, is simulated or estimated. By way of this approach, huge losses – among others – can be identified and analysed.

Apart from these risk-type-specific stress tests and sensitivity analyses, internal stress tests are regularly carried out across risk types. The regular internal stress test consists of scenario analyses, sensitivity analyses and the reverse stress test. In the scenario analyses, economic crisis scenarios are defined and changed risk parameters for the individual risk categories and business areas derived therefrom. Apart from the risk aspect, the effects of crisis scenarios on regulatory own funds and the internal capital under the economic perspective are determined as well. At this point, the requirements of the normative perspective overlap with the requirements regarding scenario analyses for the internal stress test: the development of regulatory own funds ratios is simulated for various crisis scenarios over a period of several years. Based on the findings of the internal stress tests, recommended actions are defined and transposed into measures if necessary.

ESG-related scenarios (especially with regard to climate and environmental risks) are also calculated as part of the internal stress test in order to identify and assess the ESG risks inherent in the existing portfolio as early as possible. The scenarios are based on the assumptions of the Network for Greening the Financial System (NGFS) and are continuously extended to include the latest findings.

At present, EU-wide stress tests across risk types are being carried out by the EBA/ECB every two years, with the Association of Volksbanks participating. The last EBA/ECB stress test was carried out in 2023. The results of the stress tests for the Association of Volksbanks were used by the ECB to assess the capital requirement (Pillar 2 Guidance) within the SREP.

Recovery and resolution planning

As the Association of Volksbanks was classified as a significant institution in Austria, the Association must prepare a recovery plan and submit the same to the European Central Bank. This recovery plan is updated at least once a year and takes into account changes in the bank's business activities as well as changes in regulatory requirements.

2.2 Information on risk management objectives and policies by risk category

Credit risk

CRR Art 435(1), EU CRA

Credit risk refers to potential losses that occur because a contract partner fails to meet its payment obligations.

Credit risk management organisation

Within the Association of Volksbanks, the responsibilities associated with credit risk are taken care of by the Credit Risk Management division and certain subdivisions of Risk Control. The Credit Risk Management, Restructuring & Workout division is responsible for operational credit risk management. Risk Control is responsible for risk assessment, risk measurement and risk control as well as for credit risk reporting at portfolio level.

Operational credit risk management

Lending principles

- Loan transactions are necessarily based on decisions involving borrower-specific limits. The determination and monitoring of certain limits is subject to uniform regulations at the level of the Association.
- The rating obligation applies to all borrowers with exposures above the defined minimum amount. The rating process is based on the dual-control principle and is applicable across the Association.
- Loan commitments take account of the economic performance of borrowers, of financing requirements and investment volumes. The borrower's repayment ability is a prerequisite for granting a loan. Financing requirements and investment volume are reconciled in advance. Loan maturities must not exceed the useful lives of the assets financed. Attention is paid to the inclusion of reasonable own funds.
- Loan transactions with private customers are subject to the regulations and information requirements of the Austrian Consumer Credit Act (VKrG) and those of the Austrian Mortgage and Real Estate Credit Act (HfKRG), which apply independently of each other.
- The provisions under the Credit Institutions Real Estate Financing Measures Ordinance (KIM-VO) of the Austrian Financial Market Authority (FMA) for newly agreed private real estate financing are complied with and have been monitored separately since their entry into force.
- The topic of sustainability/ESG factors as well as potential climate-related transitory and physical risks are considered in the lending process.
- In selecting collaterals, attention is paid to the cost-benefit ratio, and therefore recoverable collaterals that cause little administrative effort and are not very cost-intensive will preferably be resorted to, as well as actually realisable collaterals. For this reason, physical collaterals, such as real estate collaterals, and financial collaterals, such as cash collaterals or collaterals in the form of securities, are given priority. The recoverability and enforceability of collaterals must basically be assessed prior to any credit decision. Principles for the management of collaterals and uniform rules for the selection, provision, administration and valuation of collaterals apply at the level of the Association.
- Foreign currency and repayment vehicle loans are basically no longer offered or granted.
- The principal market for lending business is the Austrian market.
- Syndicated loans will be concluded together with the CO as a matter of principle.

Decision-making process

In all units of the Association of Volksbanks that generate credit risk, there is a strict separation of sales and risk management. All decisions in individual instances are made strictly observing the dual-control principle, with clear processes having been established for the cooperation between the risk management units in the CO and the members of the Association of Volksbanks. For transactions involving large volumes, processes have been set up that ensure the involvement of the operational credit risk management function of the CO and of the CO Managing Board in the risk analysis and/or loan decision. Limit systems play an important role in this context, as they provide a framework for the decision-making powers of the individual units.

Monitoring of exposures and collaterals

The processes for the review of exposures and collaterals are governed by uniform regulations across the Association and must be observed by all affiliated banks.

Limits

The monitoring, control and limitation of the risk of individual exposures and of risk clusters is effected according to differentiated limit categories.

Within the Association of Volksbanks, the group of connected clients (GcC) is used as the basis for limits in case of new lending and for current monitoring. As regards the limits, the requirements on the level of the Association of Volksbanks differ from those applicable to the individual banks. A review of the limits on individual transaction level takes place continuously within the credit risk management function of the affiliated bank and is monitored by the credit risk management function of VBW as CO, using centralised analyses.

In connection with portfolio limits, within the Association of Volksbanks, mainly limits for external financing transactions and limits for the industry sectors and the real estate sectors are being defined at present. These limits are relevant for the lending process and are monitored in monthly intervals by Risk Control.

In addition, materiality limits are defined for industry sectors at the level of the Association and of the affiliated banks, and further control measures are applied if these limits are exceeded. Relatively speaking, higher risk concentrations in affiliated banks are not only permitted but also desired in the sense of leveraging industry expertise (e.g. in the case of Ärzte- und Apothekerbank in the health care sector) and regional focuses (e.g. tourism in VB Tirol).

In order to achieve a sustainably healthy portfolio quality, requirements exist for transactions with new customers and increases of the exposure of existing customers; these depend on the customer's credit rating and are applicable across the Association.

Intensified credit risk management

Within the Association of Volksbanks, intensified credit risk management means the special monitoring of customers with payment difficulties and/or customers threatened by default. Among others, intensified credit risk management comprises processes relating to the early identification of customers threatened by default, the dunning procedure, forbearance processes, as well as default identification.

Early warning (EWS)

During the early warning process, customers who might show an increased risk of default within the next few months are systematically identified on the basis of certain indicators. In this way, the Association of Volksbanks is put in a position to counteract potential defaults early on. The early identification of customers threatened by default is governed within a uniform early warning system throughout the Association.

Dunning procedure

The dunning procedure applied across the entire Association of Volksbanks is uniform and automatised and based on corresponding predefined processes.

Forbearance

Forbearance refers to concessions made by the bank to the borrower in connection with financial difficulties or imminent financial difficulties of the borrower, but which the bank would not grant otherwise. Borrowers whose transactions were classified as forbore are subject to special (monitoring) regulations within the Association of Volksbanks.

Default identification

The process of default identification serves to recognise defaults in time. A customer is deemed defaulted if there is a default of performance pursuant to the CRR of more than 90 days, and/or if complete settlement of the debt is considered unlikely without realising any collaterals. The Association of Volksbanks has defined 15 possible types of default event that are used for the consistent classification of default events across the Association. Among others, default identification also builds on the early warning and forbearance processes described above. Additionally, there are other (checking) processes, e.g. the analysis of expected cash flows within the regular or event-driven exposure checks, which may trigger classification to a default category.

The NPL ratio of the association of credit institutions saw positive development until 2022 and in the years before; however, starting in the second half of 2023 and especially in 2024, a marked increase was observed, as major defaults, in the Real Estate segment in particular, were no longer compensated by portfolio reductions. The highest increase in new defaults in 2024 is seen in the Real Estate sector. The Austrian real estate market did not recover in 2024 despite previous expectations. The following factors in particular led to a significant drop in transactions on the Austrian residential real estate market in 2023 and 2024:

- significant increase in interest rate levels within a short period of time,
- regulatory restrictions on lending within the scope of the Austrian KIM ordinance (governing real estate financing measures in banks), as well as
- increase in construction costs due to supply difficulties subsequently followed by high inflation

The associated high strain on cash and cash equivalents and delayed loan repayments has also led to a significant increase in intensified credit risk management due to the resulting key forbearance indicators and/or rating downgrades.

Problem Loan Management

Within the Problem Loan Management system (PLM) applicable throughout the Association, customers are classified on the basis of clearly defined indicators applied consistently across the Association. Subsequently, a distinction is made between customers

- under intensive supervision (negative change of risk estimation, but not defaulted yet),
- in the process of restructuring (imminent risk of default or defaulted already, but customer is eligible for restructuring), and
- subject to workout (defaulted customers not eligible for restructuring)

and appropriately differentiated processing routines have been put in place consistently throughout the Association of Volksbanks.

Monitoring of industry sectors

In order to enable an even more detailed and, above all, more sector-specific management of the portfolio of the Association of Volksbanks over and above all the measures and limits already in place, industry sectors with a higher risk level are identified based on the results of the regular sector analyses, with a distinction being made between a regular, half-yearly

process and an ad hoc process. Subsequently, the results of this analysis will be transferred to the existing EWS, thus enabling sector-specific early warning.

Since 2022, separate requirements have been applying to new financing in those sectors that are particularly affected by an increase in energy costs.

Quantitative credit risk management

Measurement and control of credit risk

The development of sophisticated models as well as of systems and processes tailored to the bank-specific portfolio is required for the measurement and control of credit risk. In this way, the credit decision is meant to be structured and improved on the one hand; on the other hand, these instruments and/or their results also form the basis of portfolio management.

The results of credit risk measurement are reported to the Managing Board within the scope of the Risk Committee on a monthly basis. The most important objective of the use of the credit risk models and tools is to avoid losses through early identification of risks.

Rating systems

Across the Association, standardised models are applied to determine credit ratings (the VB rating family) and to determine the amount of loss in case of default. The expected probability of default of each customer is assessed via the VB rating family and expressed through the VB master scale, which comprises a total of 25 rating levels. The PD range used not only allows for a comparison of internal ratings with classifications by external rating agencies, but also a comparison of credit ratings across customer segments.

The rating levels in rating category 5 cover the reasons for defaulting on loans as applied across the Association and are also used for reporting non-performing loans (NPL).

Credit value at risk

The calculation of the economic capital requirement necessary for credit risk is effected by means of the Credit Value at Risk (CVaR) method. For this purpose, the Association of Volksbanks has chosen a statistical simulation method. A refined Merton model, adjusted to internal requirements, is used for modelling the credit exposures in the loan portfolio in detail.

Concentrations

Quantification and valuation of the effects of concentrations across the Association takes place monthly, via the risk parameters identified, on the one hand, and in the course of preparing the risk report, on the other hand.

Credit risk mitigation

The consideration of collaterals within the scope of the credit risk models for CVaR and in expected loss calculations is primarily effected through the LGD models applied across the Association. The starting point for taking into account collaterals is the respective current market value, fair value, nominal value or redemption value.

For the purpose of reducing the counterparty risk of derivative transactions, the Association of Volksbanks uses credit risk mitigation methods such as netting and exchange of collaterals. The Association strives to conclude standardised ISDA framework agreements for bilateral netting and a corresponding Credit Support Annex (CSA) with all key market

participants. The fair values of derivative transactions with counterparties are reconciled daily. If the fair values exceed certain contractually agreed thresholds, such excess amounts must be covered by collaterals. These collaterals are recognised in regulatory terms and reduce the risk.

Credit risk reporting

Credit risk reporting takes place monthly (truncated version) and quarterly (detailed version) with the aim to provide a detailed presentation of the credit risk existing at a certain reporting date and to report the same to the entire Managing Board. Relevant reports are prepared for the Association, the major units and the key areas of business. The information is also included in the credit risk portions of the aggregate bank risk report.

The reports comprise a quantitative presentation of credit risk information relevant for risk control, which is supplemented by a brief assessment of the situation and additional qualitative information, if applicable.

The following analyses are part of the report:

- Portfolio distribution
- Development of new business
- Distribution of credit ratings
- Non-performing loans (NPL)
- EWS/PLM portfolio
- Real Estate portfolio
- Corp/SME portfolio
- Forbearance
- Credit risk concentrations
- Country group analysis
- Customer segments
- Distribution across industry sectors

In addition to reporting as part of the aggregate bank risk report, a Fast Close Risk Report is prepared at Association level on a monthly basis immediately after year-end based on daily raw data from the core banking system. The report provides an initial indication of the current development of the customer portfolio, of crisis indicators, and of inflows and outflows in the NPL (non-performing loans) and forbearance portfolio, and information about the development of the overdraft portfolio. Moreover, it contains a brief overview of the development of risk provisions to track developments continuously and to implement measures promptly.

Counterparty credit risk

CRR Art 435(1) and Art 439 (a) to (d), EU CCRA

For the purpose of reducing the counterparty risk of derivative transactions, the Association of Volksbanks uses credit risk mitigation methods such as netting and exchange of collaterals. The Association has concluded standardised ISDA framework agreements for bilateral netting and a corresponding Credit Support Annex (CSA) with all financial counterparties. The netted fair values of the derivative transactions are reconciled daily with the relevant counterparties. If the fair values exceed certain contractually agreed thresholds, such excess amounts must be covered by collaterals. These collaterals are recognised in regulatory terms and reduce the risk.

The Association does not use any internal model for calculating the counterparty credit risk.

The counterparty risk from unsecured derivatives is taken into account by way of credit value adjustments (CVA) or debt value adjustments (DVA). The expected future exposure (EFE) is determined by means of the Monte Carlo method. The probabilities of default for counterparties for which no credit spreads are observable on the market are based on internal ratings of the Association of Volksbanks.

CRR Art 439 (a)

In the treasury business, the credit risk should generally be minimised. The basis for this is an independent credit rating and a line system derived from it, as well as the ongoing monitoring process.

The maximum amount of the total bank lines granted per respective economic unit is determined by

- the credit rating (internal rating) and
- own funds.

Offsetting of the counterparty risk of derivatives for credit risk purposes is based on the Standardised Approach for Counterparty Credit Risk (SA-CCR) in accordance with CRR II (Regulation (EU) 2019/876) Part 3 Title II Chapter 6 Section 3.

For limit monitoring purposes, the counterparty risk of derivatives is accounted for on the basis of the Current Exposure Method (CEM; fair value, if positive, + AddOn) in accordance with CRR Article 274.

The add-ons, which depend on the residual term of the transaction, represent a premium intended to cover future fluctuations in fair value.

CRR Art 439 (b)

Risk-reducing measures (netting and collaterals received) are based on bilateral agreements (e.g. ISDA Agreement – Credit Support Annex, Rahmenvertrag für Finanztermingeschäfte – Besicherungsanhang (Master Agreement for Financial Futures – Collateral Annex), Global Master Repurchase Agreement, Rahmenvertrag für Echte Pensionsgeschäfte (Master Agreement for Genuine Repurchase Transactions), Global Master Securities Lending Agreement, Rahmenvertrag für Wertpapierleihe (Master Agreement for Securities Lending)). If the sum of the fair values of a counterparty's OTC derivatives is positive, there is a replacement risk. A daily valuation of the derivatives is performed. The adjustment of the collaterals to the current fair values is coordinated and performed together with the contractual partners on a daily basis. Only cash collaterals in EUR and USD are accepted as collaterals for OTC derivatives. Based on "legal opinions" for the respective legal system of the individual counterparties, the realisability of the deposited collaterals and their further use are ensured in the event of bankruptcy of the contracting party. Cash and government bonds of issuers with high credit ratings are accepted as collaterals for repo and lending transactions. The reciprocal margin call on a daily basis ensures full collateralisation, and therefore no further reserves are created. The counterparty risk for fair values from unsecured derivatives is taken into account by way of credit value adjustments (CVA). The expected future exposure (EFE) is determined by means of the Monte Carlo method.

CRR Art 439 (c)

No correlation risks are calculated with regard to counterparty credit risk.

CRR Art 439 (e)

The existing collateral agreements do not include any rating dependency for the independent amount, threshold or minimum transfer amount. Therefore, in the event of a rating downgrade, there is no additional call liability.

Market risk

CRR Art 435(1), EU MRA

Market risk is defined as the risk of loss due to adverse developments in market risk factors, e.g. interest rates, credit spreads, foreign exchange rates and volatilities. The Association of Volksbanks distinguishes the following types of market risk:

- Credit spread risk
- Market risk in the trading book
- Foreign exchange risk (open FX positions)
- Other valuation risks (IFRS fair value change)

No material market risks or concentration risks exist beyond that. Monitoring of the market risk is carried out in the Market and Liquidity Risk Control department of the Risk Control division, which is separate, in organisational terms, from the Treasury division at Managing Board level.

Credit spread risk

The portfolio relevant for the credit spread risk includes both the company's own bond portfolio and loans and receivables to customers that are classified as FVPL (fair value through profit or loss) and do not meet the SPPI requirements (solely payments of principal and interest). The bond portfolio is primarily held as a liquidity buffer, centrally at VBW for the major part, and is therefore mainly invested in public sector bonds of European countries with good credit ratings and in covered bonds. Most of it is eligible for the regulatory liquidity coverage ratio (LCR). Moreover, an opportunity portfolio has been developed since 2024 through investments in Corporates and Senior Financials, to invest liquidity reserves as profitably as possible. As, in exceptional cases, hidden burdens may be realised in the bond portfolio through extraordinary sales, AC-classified items are equally included in credit spread risk. The SPPI-impaired loans and receivables to customers classified as FVPL (fair value through profit or loss) represent an expiring portfolio that is distributed across the banks of the Association, with new business only taking place in exceptional cases. Other balance sheet items that are subject to a credit spread are classified as non-credit-spread sensitive, as any hidden burdens cannot be realised.

A distinction is made between the present value risk (EVE risk) and the periodic risk (NII risk). Present value risk measurement is effected via credit spread VaR and the sensitivity to any increase in credit spreads by 100 bps. For the purposes of calculating the VaR, the portfolio is divided into risk clusters, depending on credit rating, branch of industry, type of product and seniority. The VaR is included in the ICAAP as part of the risk-bearing capacity calculation. Reporting takes place monthly within the ALCO and is part of the aggregate bank risk report.

The measurement of the periodic credit spread risk (CS risk) is currently being developed. However, this risk is immaterial, as the major part of the bond portfolio is invested in positions with high credit ratings and low spreads, meaning that any material reduction of the spreads of new investments is impossible. For loans and receivables to customers designated as FVPL, new investments are only possible in exceptional cases, which means that no material risk arises in this area either. The major part of the bond portfolio is designated as AC (amortised cost) under IFRS 9. The volume of loans and receivables to customers designated as FVPL is small. Therefore, the credit spread risk that affects P&L and OCI is low.

Concentration risk

Concentration risks within credit spread risk may arise at the level of issuers or risk clusters in case of similar issuers; these are mitigated by setting appropriate limits. These risk clusters are reported in the ALCO.

Market risk in the trading book

The market risk in the trading book of the Association of Volksbanks is of minor importance. The trading book is kept centrally at the CO. The affiliated banks do not keep any trading book. The main function of the trading book is that of a transformer, where smaller batches from retail banking are collected and dynamically hedged in the market. Additionally, Treasury takes market risks within the scope of the limits approved, in order to produce corresponding income. The trading book volume is continuously below the regulatory threshold of euro 500 million (Art 325a CRR).

Risk measurement is effected mainly through a VaR of interest rate, volatility and foreign exchange risks (historical simulation), a BPV gross and net (outright), and an indicative P&L for the stop-loss limit. Additionally, limits customary in the industry exist for option-related indicators ("Greeks"). Reporting is effected daily to the Treasury and Risk Control divisions and monthly within the ALCO.

The trading book risk within the Association of Volksbanks is relatively low and mainly arises from euro interest rate positions.

The regulatory own funds requirements for the trading book are calculated by means of the standardised approach – the Association of Volksbanks does not use any internal model for market risk in the trading book.

Since extreme situations are not covered by the VaR, comprehensive stress tests are carried out monthly or ad hoc across all portfolios in the trading book.

Foreign exchange risk (open FX positions)

The foreign exchange risk from open FX positions is immaterial within the Association of Volksbanks. It arises due to changes of the value of outstanding receivables and liabilities in foreign currencies through exchange rate fluctuations. It is minimised by Treasury as part of liquidity management.

Interest rate risk from positions not included in the trading book

CRR Art 435 (1) a) – d) and CRR Art 448 (1) and (2)

Interest rate risks emerge primarily through term transformation, which arises from different fixed interest rates between assets and liabilities. The Association of Volksbanks pursues a strategy of positive term transformation, where the fixed interest period of the assets is longer than that of the liabilities, constituting a source of income in the form of the structural contribution within net interest income. The interest rate position mainly derives from retail business, where fixed interest loans are granted that are refinanced through customer deposits with shorter fixed interest periods. The fixed-interest portfolio has been built up over several years, creating a rolling fixed-interest position.

The interest rate risk in the banking book comprises all interest-bearing transactions reported and not reported in the balance sheet (except for transactions in the trading book), as well as interest-sensitive assets and liabilities (participations and provisions). The Association's interest rate risk position associated with the retail business mainly arises from index-linked loans and loans with fixed interest rates, from deposits in the form of sight and savings deposits without fixed interest rates or with limited bonus interest payments, as well as from fixed interest deposits. Implicit floors both in the assets- and

liabilities-side retail business are taken into account. Other decisive factors are bond positions of the bank's own portfolio, own issues and the interest rate swaps used to control the interest rate position.

A distinction is made between present value interest rate risk (EVE risk, Economic Value of Equity) and net interest income risk (NII risk). The present value interest rate risk is measured using the EVE coefficient in accordance with Article 84 CRD and the RTS for the interest rate risk outlier test, the PVBP (Price Value of a Basis Point) and the interest rate book VaR. Net interest income risk is measured using the NII coefficient (equally pursuant to Art 84 CRD and the RTS for the interest rate risk outlier test). The two coefficients of the regulatory outlier test are defined as strategic RAS indicator.

In keeping with its strategy, the Association shows positive interest term transformation, measured by the EVE coefficient and the PVBP. In case of positive term transformation, the present value interest rate risk consists in increasing interest rates. Due to continued growth in fixed interest loans and to reallocations of index-linked to fixed interest loans, hedges were required to comply with the internal trigger for the EVE coefficient in 2024. The EVE coefficient markedly decreased in July 2024, due to a recalibration and remodelling of the replication assumptions, and has not triggered any need for hedging transactions ever since. Monthly volatility of the coefficient mainly arose from the usual effects of payment transactions and fixing.

As opposed to present value interest rate risk, net interest income risk, measured by the NII risk coefficient, mainly consists in falling interest rates, especially short-term interest rates. This is mainly due to the fact that a substantial part of assets continues to be index-linked and that the adjustment of interest rates for customer deposits is comparatively slow. In July 2024, the recalibration and remodelling of replication assumptions caused the NII coefficient to increase markedly, which resulted in a need for hedging that was met by terminating several layer hedges and concluding a cash flow hedge.

The following table shows the effects of the interest rate scenarios defined in the RTS for the interest rate risk outlier test for the cut-off dates 31 December 2024 compared to 31 December 2023 for net present value risk and for net interest income risk. The effects of six scenarios are reported for net present value risk, and the effects of two scenarios for net interest income risk. At the end of 2024, the highest negative change in net present value amounts to euro 223 million in the parallel up scenario, which corresponds to an EVE coefficient of 9.5 %. At the end of 2024, the net interest income risk amounts to euro 97 million in the parallel down scenario, which corresponds to a NII coefficient of 4.2 %.

| Supervisory shock scenarios | | A | b | c | d |
|-----------------------------|------------------|--|-----------------|---|-----------------|
| | | Changes in economic value of equity (euro million) | | Changes in net interest income (euro million) | |
| | | Current period | Previous period | Current period | Previous period |
| 1 | Parallel up | -222.5 | -274.2 | 66.1 | 80.4 |
| 2 | Parallel down | 129.6 | 198.7 | -96.9 | -90.7 |
| 3 | Steeper | -24.5 | -105.9 | | |
| 4 | Flattener | -5.6 | 36.2 | | |
| 5 | Short rates up | -80.1 | -29.3 | | |
| 6 | Short rates down | 36.3 | 16.0 | | |

Figure: supervisory interest rate shock scenarios under Article 98(5) of Directive 2013/36/EU (reporting form EUR IRRBB1)

Retail business without capital tie-up is included in interest rate risk modelling by way of replication assumptions, in order to show price sensitivity to interest rate changes (e.g. for sight/savings deposits, current account overdrafts, loans "until further notice" etc.). Deposits with variable fixed interest rate(s), where the contractual fixed interest rate can be overridden by the bank using mark-ups/discounts, are equally included in the modelling. The model of replication assumptions aims to describe the development of customer interest rates depending on market interest rates and is based on minimising the volatility of the margin between customer interest rates and interest rates in the replication assumptions. The positions to be replicated are divided into a "stable" and a "non-stable" portion, with an overnight fixed interest rate being assigned to

the non-stable portion. The stable portion is divided into a money market-linked portion and a capital market-linked portion. The capital market portion is modelled by a rolling portfolio of up to ten-year investments. In the model, the average fixed interest rate period of all replicated deposits amounts to 2.5 years, that of the loans and receivables to 0.9 years (as at December 2024).

For loans, a prepayment rate is modelled. This describes the average annual additional repayment made over and above the contractual repayment. It is statistically calibrated on the basis of sub-portfolios. Replication assumptions and prepayment rates are used consistently in both present value modelling and interest income simulation.

For the net present value calculation, embedded interest rate floors for loans are also included in the interest rate risk position using the option pricing model. As, pursuant to Supreme Court case law, savings deposits cannot bear negative interest in Austria, this interest rate floor for the stable portion of replicated savings deposits (from the modelling of replication assumptions) is equally calculated using the option pricing model. At current interest rate levels, the floors no longer constitute any material contribution to interest rate risk.

The Asset Liability Committee (ALCO) is responsible for controlling the interest rate position of the Association of Volksbanks within the scope of risk limits defined by Risk Control and approved by the Managing Board through the risk strategy. The ALCO is convened monthly at the CO or ad hoc as required. The Asset Liability Management (ALM) of the CO, which belongs to the Treasury division in organisational terms, is responsible for the management of the ALCO. Proposed measures to control the interest rate position are worked out by ALM in cooperation with Risk Control and the local ALCOs of the affiliated banks. Interest rate risk reporting within the ALCO is taken care of by the Market and Liquidity Risk Control department of the CO. Interest rate risk is controlled from a dual perspective, both under a present value perspective and under a periodic/NII-oriented perspective.

Present value risk measurement and limitation are mainly effected on the basis of regulatory interest rate scenarios (six scenarios according to RTS for the interest rate risk outlier test, i.e. 200 bps parallel up, 200 bps parallel down, steepener, flattener, short rate up, short rate down) using the EVE coefficient, the PVBP (price value of a basis point), as well as the interest rate book VaR based on historical simulation, supplemented by a presentation of the interest rate position in the form of interest rate gaps (net position of the fixed interest rates per maturity band). Period-based net interest income risk measurement is implemented in the form of a net interest income simulation. In the process, two risk scenarios defined in accordance with RTS for the interest rate risk outlier test (200 bps parallel up, 200 bps parallel down) are calculated in terms of their effects on net interest income for the next 12 months, based on the assumption of an immediate interest rate change compared to the result for constant interest rates. Additionally, the NII risk is calculated for a 3-year horizon. The results of the net interest income simulation and the interest rate book VaR are taken into account quarterly in the ICAAP within the scope of the risk-bearing capacity calculation.

Within the scope of semi-annual stress testing, additional IRRBB-specific scenarios are calculated apart from the scenarios mentioned above, in order to quantify their effect on net present value and/or NII risk. These scenarios include extreme interest rate movements, such as – with a view to the resulting changes in net present value – an immediate rise in interest rates of the yield curve by 500 basis points and a very sharp rise in interest rates between +200 and +400 basis points, and – with a view to negative NII changes – an immediate parallel shift of the yield curve downwards by -300 basis points (without scenario floor). Moreover, the models for replication assumptions and prepayments are stressed to simulate the effects of changing customer behaviour. Changed option volatilities and their effects on the net present value of the option portfolio are calculated.

The interest rate risk in the banking book is limited for the Association as well as for VBW. Limits are set for the EVE coefficient and the NII coefficient, as well as for interest rate gaps. Additional RAS indicators are defined at the level of the affiliated banks.

Hedging transactions are carried out for bond positions, issues and retail business and can be taken into account in hedge accounting. Layer hedges for fixed-interest loan portfolios and cash flow hedges for index-linked loan portfolios may be used. The replicated deposit business can be hedged as well. Micro hedges for securities positions, issues and individual loans may also be used.

The interest rate risk in the banking book is reported monthly within the ALCO, quarterly within the scope of the risk-bearing capacity calculation and semi-annually within the scope of stress testing. Additionally, abbreviated operational reporting is prepared for Treasury in the middle of the month, for the purpose of identifying any changes in the risk level early.

Liquidity risk

The most important source of refinancing of the Association of Volksbanks consists of customer deposits, which have proven to be a stable source of funding. Obviously, this is responsible for the major part of liquidity risk. The stability of customer deposits has become apparent among others during the COVID pandemic in 2020/2021 and in the following period, namely in the period of quick interest rate hikes. At that time, reallocations from demand/savings deposits to time deposits and Retail issues were seen with only moderate net outflows overall. These started to be recovered from mid-2023, causing a further increase in the overall portfolio of customer deposits (incl. Retail issues) in 2024.

The capital market offers opportunities for refinancing through securities issues, mainly covered bonds, to VBW, as CO of the Association. The dependence of the Association of Volksbanks on capital market funding remains low, below 15 % of total assets. VBW is the only institution within the Association that has access to the ECB/OeNB and can therefore also refinance itself through central bank funds. Following the full repayment of the last TLTRO III tranche (euro 600 million) in mid-2024, there is no ECB funding any longer.

As a result of the retail business model of the Association of Volksbanks with many small-volume giro/savings deposits from private customers and SMEs, the funding is highly diversified, and the concentration risk on the liabilities side is not material. The diversification of funding sources is taken into account on a current basis in the liquidity and funding strategy, which is prepared annually in the course of business planning and updated as required during the year. Risk clusters may occur at customer level. Accordingly, the largest deposits at customer level are monitored both in Risk Control and within operational liquidity management. Generally, they amount to less than 1 % of total assets. There are only a few temporary exceptions with a few major accounts for implementing payment transactions or balancing liquidity peaks. These deposits are regularly monitored and reported on in the ALCO.

On the capital market side, there are hardly any dependencies on institutional customers or professional market participants. The Association of Volksbanks only selectively participates in the interbank market. Treasury's issuance planning aims to spread the maturities of the few large-volume capital market issues.

At VBW, the Market and Liquidity Risk Control department is responsible for liquidity risk control throughout the Association. In organisational terms, the department is assigned to the Risk Control division with a direct reporting line to the responsible divisional board member (CRO). The responsibilities of the department are defined in General Instructions and working instructions for liquidity risk and are demarcated from the responsibilities of Treasury in VBW and the affiliated banks. The tasks of liquidity risk control are largely bundled in the department, thus taking account of the high degree of centralisation within the Association. The focus of the department is on risk control of the Association's exposure.

The Market and Liquidity Risk Control department is responsible for identifying, modelling, measuring, limiting, and monitoring as well as reporting all material liquidity risks and for the associated data management throughout the Association. In this function, Liquidity Risk Control is responsible for defining, reconciling, implementing, monitoring and reporting the RAS indicators relevant to liquidity risk. Liquidity Risk Control is also responsible for the design, parameterisation,

calculation and reporting of liquidity stress test requirements. Moreover, the department is responsible for determining the method for defining and designing the components of the internal liquidity buffer. Another key function is the ongoing preparation of liquidity reports for the Association and for VBW (e.g. LCR, NSFR, ALMM, weekly liquidity report to the ECB) to meet regulatory reporting requirements. The department regularly prepares liquidity risk reports for the affiliated banks and makes them available to the local banks.

A local Risk Management Function has been set up at the level of the affiliated banks which, among other things, performs liquidity risk control tasks and acts as the local contact for the Market and Liquidity Risk Control department. It performs limited liquidity risk control tasks on the basis of uniform requirements throughout the Association. This includes, among other things, the analysis of the local liquidity risk position and risk reporting in the local ALCO. The affiliated banks are not obliged to calculate, report and comply with regulatory liquidity risk indicators such as LCR, NSFR and AER.

The department Liquidity Management/Association in the Treasury division is responsible for operational liquidity management. The department is the central unit within the Association of Volksbanks for the management of liquidity, the pricing of liquidity (transfer pricing), the central management of collaterals throughout the Association, the disposition of available liquid funds, and the implementation of the medium- to long-term funding strategy. The Capital Markets department is responsible for carrying out capital market issues, for issuance planning and underlying stock management.

Liquidity management in the Association of Volksbanks is highly centralised. VBW, as CO of the Association of Volksbanks, has far-reaching management and control rights for the entire Association of Volksbanks. These include central funding/liquidity management and liquidity risk management, including the right to issue both general and individual instructions to the affiliated credit institutions. Consequently, VBW is responsible for liquidity management throughout the Association and for liquidity balancing within the Association. The affiliated banks cover their refinancing needs via VBW, investing their surplus liquidity. The affiliated banks are required to maintain liquidity reserves at VBW to the extent defined by law. There is no horizontal liquidity equalisation between the affiliated banks. VBW is the only institution within the Association that has access to the money and capital markets as well as to central bank funds.

In order to take account of the high degree of centralisation in liquidity risk, VBW has defined a centralised ILAAP (Internal Liquidity Adequacy Assessment Process) at Association level that focuses on illiquidity and/or insolvency risk. The ILAAP is defined as the totality of all internal procedures, methods and processes to ensure adequate liquidity within the Association of Volksbanks at present and in the future – even under stressed conditions – and to meet all supervisory and regulatory requirements for liquidity risk. The ILAAP focuses on illiquidity and/or insolvency risk, which is defined as the risk that the Association, VBW or an affiliated bank is no longer able to fully perform its payment obligations. In particular, the ILAAP comprises the definition of strategies (liquidity and funding strategy as well as liquidity risk strategy), liquidity/funding planning, liquidity cost allocation, operational liquidity management, liquidity buffer management, emergency liquidity management, and liquidity risk control. In accordance with the central nature of the ILAAP, these activities are performed centrally at VBW and affect the entire Association.

The risk reporting and measurement system takes into account the high degree of centralisation of the Association of Volksbanks and focuses primarily on the liquidity risk position of the Association and secondarily on that of VBW. The focus is on the indicators defined in the Risk Appetite Statement (RAS). These include the LCR, the NSFR, the survival period, and asset encumbrance. In addition to the LCR, the survival period aims to quantify illiquidity risk. To derive the survival period, selected liquidity risk stress scenarios defined for the entire Association are calculated on a monthly basis.

The Market and Liquidity Risk Control department prepares a monthly liquidity risk report for the Managing Board, which is presented and discussed in the monthly ALCO of the Association. Key contents are the liquidity balance sheet, the RAS indicators mentioned above, liquidity buffer presentation, liquidity and LCR forecast over a 12-month time horizon, the top 15 depositors. The RAS indicators are additionally reported to the Managing Board as part of the aggregate bank risk

report. In addition, a limit monitoring report (e.g. LCR) and a liquidity buffer presentation are prepared for the weekly Li-JF with Treasury.

The funding risk throughout the Association is defined as the risk of an unexpected creditworthiness-related increase of refinancing costs for customer deposits and capital market funding. It is derived from historical changes of credit spreads and quantified for the funding requirement over a certain future period (for instance, 12 months). The funding risk has an impact on the bank's profit and loss position in the form of higher interest expenses in the future, and hence on the profit and loss position of the bank. Therefore monitoring and control takes place within the scope of the Internal Capital Adequacy Assessment Process ("ICAAP"). The calculation is performed quarterly as part of the ICAAP risk-bearing capacity calculation (economic ICAAP perspective) and semi-annually as part of the internal overall bank stress testing (normative ICAAP perspective). The results are reported to the Risk Committee. The responsibility for determining the methods of approaching and modelling this risk lies with the Market and Liquidity Risk Control department.

The LCR and AMM are reported externally to the supervisory authority on a monthly basis, and the NSFR and asset encumbrance are reported on a quarterly basis, in each case for the Association and for VBW (solo and Group). In addition, a weekly liquidity report is prepared and submitted to the competent supervisory authority (ECB). Additional extensive information is regularly provided to the competent supervisory authority (ECB) as part of the annual Li-SREP and ad hoc upon request.

A liquidity risk report is prepared monthly for each affiliated bank and made available to the affiliated banks for local risk analyses and for risk reporting in the local ALCO. The report includes the local liquidity balance, the contribution to the LCR of the Association, and the top 15 local depositors.

The management of liquidity risk within the Association of Volksbanks is based on Section 30a of the Austrian Banking Act and Article 10 of the CRR, the Association Agreement and the cooperation agreement. The Association of Volksbanks is characterised by a strong cohesion of closely linked members. The central organisation (CO) of the Association of Volksbanks forms a joint liability system with the other members of the Association. This obliges the banks of the Association to jointly support distressed members. The general conditions for managing the liquidity position of the Association of Volksbanks and of VBW are specified by the Asset Liability Committee (ALCO). The ALCO is conducted on a monthly basis and is the central body for liquidity risk management. Reporting within the ALCO is taken care of by the Market and Liquidity Risk Control department in the sphere of risk, and by the department Liquidity Management/Association in Treasury. In addition to the ALCO, the monthly Risk Committee, the weekly liquidity jour fixe and (restricted to liquidity emergencies) the liquidity emergency committee of the Association are also relevant for liquidity risk management.

The Liquidity Management department controls refinancing transactions and investments as well as the permissible extent of liquidity term transformation within the Association of Volksbanks by means of principles of liquidity management, which are binding throughout the Association, and other guidelines. The annual funding plan makes the future liquidity requirements resulting from the multi-year plan transparent and is actively managed by the Liquidity Management department.

The liquidity position for the Association of Volksbanks is managed within the framework of limits that are approved by the Managing Board of VBW and defined and monitored by Liquidity Risk Control. The addressee of the limits is the department Liquidity Management/Association. The limits for illiquidity risk are defined as strategic or deepening RAS indicators. These include, in particular, the LCR, the NSFR, and the survival period, supplemented by the asset encumbrance ratio (AER). Limit utilisation is monitored and reported by Liquidity Risk Control on a weekly or monthly basis. The funding risk is limited and monitored as part of the risk-bearing capacity calculation for the ICAAP. The liquidity position of the individual affiliated banks is managed as required by Liquidity Management/Association based on maturity-dependent GAP targets.

Illiquidity risk is managed by holding a sufficient liquidity buffer. VBW is responsible for the central management of the liquidity buffer for the whole of the Association of Volksbanks. The liquidity buffer mainly consists of highly liquid bonds that are LCR-eligible for the major part, of deposits with the national bank, of ECB tender potential, and covered bond issue potential. The market liquidity of the liquidity buffer is tested regularly. The responsibility for determining the methods for defining and designing the liquidity buffer components lies with the Market and Liquidity Risk Control department; continuous control of the liquidity buffer is the responsibility of the Liquidity Management department.

The liquidity contingency plan defines the processes and responsibilities in the event of a liquidity emergency and defines the measures that can be implemented in a liquidity emergency to overcome the liquidity crisis. In addition, a set of emergency early warning indicators has been defined both for VBW and for the individual affiliated banks that is monitored and reported on daily for each bank by the Liquidity Management function of VBW. The liquidity early warning and emergency measures are differentiated into measures with liquidity gains and measures designed to prevent further outflows. The measures are regularly evaluated by VBW and the affiliated banks in terms of liquidity potential and likelihood of implementation. In addition, at the level of the Association and in each affiliated bank, a liquidity emergency test is carried out annually, assuming a stress scenario. Liquidity costs and liquidity risk costs are settled within the Association between the units consuming liquidity and the units providing liquidity, on the basis of the liquidity cost curves for the entire Association. The Liquidity Management department is responsible for defining the relevant methods.

Liquidity risk stress testing is part of the RAS set of indicators in the form of the survival period. The survival period is the period during which, under a defined stress scenario, the liquidity buffer held is sufficient to cover cumulated net liquidity outflows. Stress scenarios of varying degrees of severity are calculated. The scenario assumptions include an idiosyncratic crisis of the Volksbank sector, a national banking crisis as well as pan-European stressed market conditions. The least favourable of the scenarios calculated is applied to limiting the survival period. For the Association of Volksbanks, consisting of individual retail banks, this is typically the idiosyncratic Volksbank crisis assuming a "bank run". This occurs when, due to a loss of confidence, customers withdraw large deposit volumes within a short period of time and at the same time alternative funding sources are not accessible to the Association (any more). Conversely, the Association is less affected by market stress scenarios due to its comparatively low capital market orientation.

The survival period is defined as a RAS indicator and limited accordingly, with a trigger value of 60 days and a limit of 45 days. Compliance with the survival period limit is monitored on an ongoing basis by Liquidity Risk Control and reported to the Managing Board on a monthly basis in the ALCO and the Risk Committee. Adverse changes in the survival period will trigger internal risk analysis processes and, if necessary, risk management measures by Treasury. In case of trigger/limit violations of the survival period, the RAS escalation process applies. The number of stress scenarios calculated and the underlying scenario assumptions are reviewed annually for appropriateness by Liquidity Risk Control in conjunction with Treasury and the validation unit and adjusted if necessary. Findings from the liquidity risk early warning/emergency system are taken into account on an ongoing basis. In addition, the validation unit regularly reviews the liquidity risk stress testing in the context of model risk, performs independent analyses and defines further optimisation measures as required, which are summarised in validation reports.

As part of the annual Li-SREP (Supervisory Review and Evaluation Process), the Managing Board of VBW submits the "Liquidity Adequacy Statement" (LAS) to the supervisory authority (ECB), which contains statements on the adequacy of liquidity risk management, the implementation of the ILAAP and the liquidity situation within the Association of Volksbanks. The current LAS assesses the liquidity risk management as solid and robust and the liquidity position of the Association of Volksbanks as adequate. The comfortable liquidity situation of VBW is reflected in the corresponding indicators. The liquidity buffer as at 31 December 2024 amounted to approximately euro 9.2 billion, the survival period was 12 months. The liquidity buffer eligible for the LCR (High Quality Liquid Assets) amounted to around euro 6.6 billion as at 31 December

2024. The LCR was around 198 %, the NSFR around 138 %. Hence, both indicators by far exceeded the regulatory and internal limits.

Operational risk

CRR Art 435(1) and Art 446, EU ORA

Within the Association of Volksbanks, line management is responsible for the management of operational risks (OpRisk Management). It is supported in this function by centrally or decentrally based experts from the spheres of operational risk and internal control system. The aim is to optimise processes in order to reduce the probability of the occurrence of operational risks and/or to reduce the effect of operational losses. Cooperation across departments (in particular with Compliance, Internal Audit, as well as Security & Outsourcing Governance) allows for optimal and comprehensive control of operational risks.

Methods for the management of operational risks

Within the scope of operational risk management, both quantitative and qualitative methods are used. Quantitative elements are – for instance – the execution of risk analyses, the performance of stress tests, the determination and monitoring of risk appetite and of the risk indicators, the preparation of the operational risk event database, as well as risk reporting. Qualitative control measures comprise the implementation of training events, the performance of risk analyses, awareness building measures, root cause analysis as part of the operational risk event database, the implementation of uniform ICS checks, as well as risk reporting.

If the key indicators defined for operational risk are exceeded, the defined escalation process is applied. This process provides for a detailed analysis of causes and subsequently initiation of adequate measures.

The following principles, derived from the risk strategy, apply in OpRisk Management within the Association of Volksbanks:

- The primary aim of the entire OpRisk Management system is to optimise processes to decrease the likelihood of incidents occurring and/or the impact of operational losses.
- Incidents are documented fully and in a sufficiently transparent manner via an electronic platform to enable third-party experts to benefit from the documentation. Operational incidents are recorded in a uniform manner across the Association. The resulting transparency with respect to the occurrence of operational risk events allows for risk assessment to be derived from historical facts.
- The methods, systems and processes in OpRisk Management are defined by the CO and must be complied with by the respective banks.
- The appropriateness of the risk control and monitoring measures and other risk-minimising measures is assessed on an ongoing basis, but at least once a year, and reported to the Managing Board. Measures for risk control comprise, for instance, awareness-building/training events, the monitoring of the OpRisk indicators, maintaining the confidentiality, availability and integrity of customer and corporate data, business continuity planning, but also – in particular – an adequate separation of responsibilities, as well as observance of the dual-control principle. Operational (residual) risks that cannot be avoided, reduced or transferred must be accepted formally and demonstrably by the management.
- The efficiency of OpRisk Management is ensured through periodic and independent internal audits.

Internal control system

Within the Association of Volksbanks, an internal control system (ICS) has been put in place according to the principles of the internationally recognised standards of the Committee of Sponsoring Organizations of the Treadway Commission (COSO). Detailed descriptions of ICS processes and control measures are available. The responsibilities and roles relating to the ICS are clearly defined. Regular reporting takes place for the ICS. Control activities are documented and reviewed, ICS-relevant risks are regularly evaluated and adjusted. Accordingly, a continuous optimisation process is ensured. Internal Audit, in its capacity as independent supervisory body, audits the ICS. Both the effectiveness and adequacy of the ICS, as well as compliance with instructions are audited. The OpRisk and ICS framework describes the inter-related components implemented within the Association of Volksbanks with a view to identifying, measuring, monitoring and controlling operational risk. The close interlocking of OpRisk Management with the internal control system ensures appropriate consideration of operational risks within the Association of Volksbanks.

2.3 Information on corporate governance arrangements

CRR Art 435(2) a), EU OVB

The members of the Managing Board and of the Supervisory Board of VOLKSBANK WIEN AG and of the banks affiliated to the Association of Volksbanks held the following number of management and supervisory positions as at 31 December 2024.

Activities in a management function or as a member of a supervisory board in organisations which do not predominantly pursue commercial objectives within the meaning of Sections 5(1)(9a) and 28(5)(5) of the Austrian Banking Act are not taken into account.

CRR Art 435(2) a) -> *1 applying the group/participation privilege/privilege

| Volksbank Wien AG | | Supervisory functions | | Management functions | |
|-------------------------|------------------------|------------------------------|--------------------------------|----------------------|----------------------|
| Name | Function at the bank | Supervisory Board, effective | *1 Supervisory Board privilege | Manager, effective | *1 Manager privilege |
| Gerald Fleischmann | Managing Board | 5 | 2 | 3 | 1 |
| Rainer Borns | Managing Board | 8 | 2 | 2 | 1 |
| Thomas Uher | Managing Board | 3 | 1 | 3 | 1 |
| Birte Burtscher | Supervisory Board | 1 | 1 | 0 | 0 |
| Helmut Hegen | Supervisory Board | 1 | 1 | 1 | 1 |
| Wilfried Aichinger | Supervisory Board | 2 | 1 | 2 | 0 |
| Walter Übelacker | Supervisory Board | 3 | 1 | 1 | 1 |
| Christoph Herzeg | Supervisory Board | 2 | 2 | 1 | 1 |
| Harald Berger | Supervisory Board | 2 | 1 | 0 | 0 |
| Heribert Donnerbauer | Supervisory Board | 3 | 1 | 3 | 1 |
| Regina Ovesny-Straka | Supervisory Board | 6 | 4 | 0 | 0 |
| Robert Oelinger | Supervisory Board | 3 | 1 | 0 | 0 |
| Susanne Althaler | Supervisory Board | 3 | 3 | 0 | 0 |
| Johann Bruckner | Supervisory Board | 2 | 1 | 0 | 0 |
| Martina Rittmann-Müller | Supervisory Board | 2 | 1 | 4 | 1 |
| Josef Heidegger | Supervisory Board (WC) | 1 | 1 | 1 | 0 |
| Christian Rudorfer | Supervisory Board (WC) | 1 | 1 | 0 | 0 |
| Andrea Baier | Supervisory Board (WC) | 1 | 1 | 0 | 0 |
| Bettina Wicha | Supervisory Board (WC) | 2 | 1 | 0 | 0 |
| Christiane Spiegl | Supervisory Board (WC) | 1 | 1 | 0 | 0 |
| Iris Weber | Supervisory Board (WC) | 1 | 1 | 0 | 0 |

| Volksbank Salzburg eG | | Supervisory functions | | Management functions | |
|--------------------------|------------------------|------------------------------|--|----------------------|----------------------------------|
| Name | Function at the bank | Supervisory Board, effective | * ¹ Supervisory Board privilege | Manager, effective | * ¹ Manager privilege |
| Andreas Hirsch | Managing Board | 0 | 0 | 2 | 1 |
| Andreas Höll | Managing Board | 5 | 1 | 3 | 1 |
| Alois Grill | Supervisory Board | 1 | 1 | 4 | 2 |
| Anton Fischer | Supervisory Board | 1 | 1 | 3 | 1 |
| Christina Spatzenegger | Supervisory Board | 1 | 1 | 1 | 1 |
| Josef Christian Lugstein | Supervisory Board | 1 | 1 | 2 | 1 |
| Martin Winner | Supervisory Board | 1 | 1 | 8 | 2 |
| Roland Reichl | Supervisory Board | 1 | 1 | 0 | 0 |
| Stefan Lirk | Supervisory Board | 2 | 2 | 5 | 1 |
| Anita Weinberger | Supervisory Board (WC) | 1 | 1 | 0 | 0 |
| Bettina Wintersteller | Supervisory Board (WC) | 1 | 1 | 0 | 0 |
| Gerald Rautner | Supervisory Board (WC) | 1 | 1 | 0 | 0 |
| Gerhard Mayr | Supervisory Board (WC) | 1 | 1 | 0 | 0 |

| Österreichische Ärzte- und Apothekerbank AG | | Supervisory functions | | Management functions | |
|---|------------------------|------------------------------|--|----------------------|----------------------------------|
| Name | Function at the bank | Supervisory Board, effective | * ¹ Supervisory Board privilege | Manager, effective | * ¹ Manager privilege |
| Martin Uidl | Managing Board | 0 | 0 | 1 | 1 |
| Anton Pauschenwein | Managing Board | 5 | 2 | 1 | 1 |
| Alexander Gratzl | Supervisory Board | 1 | 1 | 1 | 0 |
| Gerhard Schobesberger | Supervisory Board | 1 | 1 | 2 | 0 |
| Irina Schwabegger-Wager | Supervisory Board | 2 | 1 | 2 | 0 |
| Johann Steindl | Supervisory Board | 2 | 1 | 1 | 0 |
| Jörg Krainhöfner | Supervisory Board | 1 | 1 | 0 | 0 |
| Philipp Saiko | Supervisory Board | 3 | 2 | 3 | 1 |
| Rainer Borns | Supervisory Board | 8 | 2 | 2 | 1 |
| Suzana Madzarevic | Supervisory Board | 1 | 1 | 1 | 1 |
| Erwin Bernklau | Supervisory Board | 1 | 1 | 2 | 2 |
| Gottfried Bahr | Supervisory Board | 2 | 1 | 2 | 2 |
| Herwig Lindner | Supervisory Board | 1 | 1 | 0 | 0 |
| Leopold Schmudermaier | Supervisory Board | 2 | 1 | 4 | 4 |
| Johannes Kastner | Supervisory Board | 1 | 0 | 2 | 0 |
| Katharina Masek | Supervisory Board | 0 | 0 | 1 | 1 |
| Christiane Hörhager | Supervisory Board (WC) | 1 | 1 | 0 | 0 |
| Elisabeth Rigl | Supervisory Board (WC) | 1 | 1 | 0 | 0 |
| Helmut Grüssinger | Supervisory Board (WC) | 1 | 1 | 0 | 0 |
| Stefanie Hochegger | Supervisory Board (WC) | 1 | 1 | 0 | 0 |

| Volksbank Kärnten eG | | Supervisory functions | | Management functions | |
|-----------------------|------------------------|------------------------------|--|----------------------|----------------------------------|
| Name | Function at the bank | Supervisory Board, effective | * ¹ Supervisory Board privilege | Manager, effective | * ¹ Manager privilege |
| Johannes Jelenik | Managing Board | 7 | 2 | 2 | 1 |
| Alfred Holzer | Managing Board | 0 | 0 | 4 | 1 |
| Anton Wrann | Supervisory Board | 2 | 2 | 1 | 1 |
| Gerald Fleischmann | Supervisory Board | 5 | 2 | 3 | 1 |
| Gerald Rainer-Harbach | Supervisory Board | 5 | 2 | 3 | 1 |
| Marco Egger | Supervisory Board | 2 | 2 | 15 | 3 |
| Martin Laggner | Supervisory Board | 1 | 1 | 1 | 1 |
| Michaela Schliefni | Supervisory Board | 1 | 1 | 3 | 2 |
| Wilfried Aichinger | Supervisory Board | 2 | 1 | 2 | 1 |
| Kristin Grasser | Supervisory Board | 1 | 1 | 5 | 2 |
| Sandra Venus | Supervisory Board | 1 | 1 | 0 | 0 |
| Christian Buchleitner | Supervisory Board (WC) | 1 | 1 | 0 | 0 |
| Florian Mikula | Supervisory Board (WC) | 1 | 1 | 0 | 0 |
| Konrad Müller | Supervisory Board (WC) | 1 | 1 | 0 | 0 |
| Wolfgang Rutter | Supervisory Board (WC) | 1 | 1 | 0 | 0 |

| Volksbank Vorarlberg e. Gen. | | Supervisory functions | | Management functions | |
|------------------------------|----------------------|------------------------------|--|----------------------|----------------------------------|
| Name | Function at the bank | Supervisory Board, effective | * ¹ Supervisory Board privilege | Manager, effective | * ¹ Manager privilege |
| Gerhard Hamel | Managing Board | 4 | 1 | 5 | 1 |
| Helmut Winkler | Managing Board | 0 | 0 | 5 | 1 |
| Christa Kramer | Supervisory Board | 1 | 1 | 1 | 0 |
| Heinz Egle | Supervisory Board | 1 | 1 | 0 | 0 |
| Herbert Loos | Supervisory Board | 1 | 1 | 2 | 1 |
| Sabine Loacker | Supervisory Board | 1 | 1 | 0 | 0 |
| Sanjay Doshi | Supervisory Board | 1 | 1 | 0 | 0 |
| Philipp Tomaselli | Supervisory Board | 3 | 2 | 16 | 5 |

| Volksbank Niederösterreich AG | | Supervisory functions | | Management functions | |
|-------------------------------|------------------------|------------------------------|--|----------------------|----------------------------------|
| Name | Function at the bank | Supervisory Board, effective | * ¹ Supervisory Board privilege | Manager, effective | * ¹ Manager privilege |
| Rainer Kuhnle | Managing Board | 4 | 1 | 4 | 1 |
| Helmut Emminger | Managing Board | 1 | 0 | 3 | 2 |
| Andreas Chocholka | Supervisory Board | 3 | 2 | 0 | 0 |
| Andreas Welser | Supervisory Board | 4 | 2 | 3 | 3 |
| Christian Kainz | Supervisory Board | 2 | 1 | 2 | 2 |
| Claudia Unterberger | Supervisory Board | 2 | 1 | 3 | 1 |
| Doris Prachner | Supervisory Board | 3 | 2 | 5 | 4 |
| Erwin Poinstingl | Supervisory Board | 2 | 1 | 0 | 0 |
| Herbert Gugerell | Supervisory Board | 2 | 1 | 1 | 1 |
| Heribert Donnerbauer | Supervisory Board | 3 | 1 | 3 | 1 |
| Karl Gerstl | Supervisory Board | 2 | 1 | 1 | 0 |
| Andreas Pum | Supervisory Board | 2 | 1 | 2 | 2 |
| Frank E. Riel | Supervisory Board | 3 | 2 | 1 | 0 |
| Dietmar Gindl | Supervisory Board | 1 | 1 | 3 | 2 |
| Walter Übelacker | Supervisory Board | 3 | 1 | 1 | 1 |
| Andreas Köhler | Supervisory Board | 1 | 1 | 1 | 0 |
| Daniela Stoll | Supervisory Board (WC) | 1 | 1 | 0 | 0 |
| Eduard Hammerl | Supervisory Board (WC) | 2 | 2 | 0 | 0 |
| Ernst Halmer | Supervisory Board (WC) | 1 | 1 | 0 | 0 |
| Herbert Stangl | Supervisory Board (WC) | 1 | 1 | 0 | 0 |
| Peter Hubmayer | Supervisory Board (WC) | 1 | 1 | 0 | 0 |
| Thomas Hofbauer | Supervisory Board (WC) | 1 | 1 | 0 | 0 |

| Volksbank Oberösterreich AG | | Supervisory functions | | Management functions | |
|-----------------------------|------------------------|------------------------------|--|----------------------|----------------------------------|
| Name | Function at the bank | Supervisory Board, effective | * ¹ Supervisory Board privilege | Manager, effective | * ¹ Manager privilege |
| Richard Ecker | Managing Board | 6 | 2 | 4 | 1 |
| Andreas Pirkelbauer | Managing Board | 3 | 2 | 1 | 1 |
| Christiana Sommer | Supervisory Board | 2 | 1 | 2 | 2 |
| Franz-Xaver Berger | Supervisory Board | 1 | 1 | 2 | 2 |
| Gerhard Schuster | Supervisory Board | 1 | 1 | 1 | 1 |
| Johann Bruckner | Supervisory Board | 2 | 1 | 0 | 0 |
| Jürgen Kliemstein | Supervisory Board | 1 | 1 | 0 | 0 |
| Ludwig Reisecker | Supervisory Board | 1 | 1 | 0 | 0 |
| Manfred Oberbauer | Supervisory Board | 1 | 1 | 1 | 1 |
| Thomas Dim | Supervisory Board | 2 | 1 | 1 | 0 |
| Thomas Uher | Supervisory Board | 3 | 1 | 3 | 1 |
| Wolfdieter Holzhey | Supervisory Board | 2 | 1 | 8 | 2 |
| Doris Schwarz | Supervisory Board (WC) | 1 | 1 | 0 | 0 |
| Johann Enser | Supervisory Board (WC) | 1 | 1 | 0 | 0 |
| Michael Wahlmüller | Supervisory Board (WC) | 2 | 0 | 0 | 0 |
| Ralf Wiedenhofer | Supervisory Board (WC) | 1 | 1 | 0 | 0 |

| Volksbank Steiermark AG | | Supervisory functions | | Management functions | |
|-------------------------------|------------------------|------------------------------|--|----------------------|----------------------------------|
| Name | Function at the bank | Supervisory Board, effective | * ¹ Supervisory Board privilege | Manager, effective | * ¹ Manager privilege |
| Hannes Zwanzger | Managing Board | 1 | 1 | 1 | 0 |
| Monika Cisar-Leibetseder | Managing Board | 1 | 0 | 1 | 1 |
| Johannes Jelenik | Supervisory Board | 7 | 2 | 2 | 1 |
| Gerald Fleischmann | Supervisory Board | 5 | 2 | 3 | 1 |
| Beatrix Doppler | Supervisory Board | 2 | 1 | 2 | 2 |
| Gerald Pilz | Supervisory Board | 3 | 2 | 6 | 5 |
| Johannes Jelenik | Supervisory Board | 7 | 2 | 2 | 1 |
| Annemarie Stipanitz-Schreiner | Supervisory Board | 7 | 2 | 2 | 1 |
| Josef Schriebl | Supervisory Board | 2 | 1 | 3 | 3 |
| Karl Schwaiger | Supervisory Board | 1 | 1 | 0 | 0 |
| Claudia Hinterleitner | Supervisory Board (WC) | 1 | 1 | 0 | 0 |
| Edith Veitschegger | Supervisory Board (WC) | 1 | 1 | 0 | 0 |
| Reinhard Allmer | Supervisory Board (WC) | 1 | 1 | 0 | 0 |
| Renate Friedl | Supervisory Board (WC) | 2 | 1 | 0 | 0 |

| Volksbank Tirol AG | | Supervisory functions | | Management functions | |
|-----------------------------------|------------------------|------------------------------|--|----------------------|----------------------------------|
| Name | Function at the bank | Supervisory Board, effective | * ¹ Supervisory Board privilege | Manager, effective | * ¹ Manager privilege |
| Martin Holzer | Managing Board | 3 | 0 | 2 | 1 |
| Andreas Mißlinger | Managing Board | 0 | 0 | 1 | 1 |
| Markus Hörmann | Managing Board | 1 | 1 | 2 | 1 |
| Birgit Oberhollenzer-Praschberger | Supervisory Board | 2 | 1 | 0 | 0 |
| Claus Huter | Supervisory Board | 2 | 1 | 5 | 2 |
| Karl Kahofer | Supervisory Board | 2 | 1 | 1 | 0 |
| Martin Singer | Supervisory Board | 3 | 2 | 1 | 1 |
| Maximilian Ellinger | Supervisory Board | 2 | 1 | 1 | 0 |
| Robert Oelinger | Supervisory Board | 3 | 1 | 0 | 0 |
| Thomas Kneringer | Supervisory Board | 2 | 1 | 3 | 1 |
| Walter Gaim | Supervisory Board | 2 | 1 | 0 | 0 |
| Andrea Ager | Supervisory Board (WC) | 1 | 1 | 0 | 0 |
| Anni Reiter | Supervisory Board (WC) | 1 | 1 | 0 | 0 |
| Christoph Nöbl | Supervisory Board (WC) | 1 | 1 | 0 | 0 |
| Harald Stock | Supervisory Board (WC) | 1 | 1 | 0 | 0 |

Strategy for the selection of members of the management body and their actual knowledge and skills

CRR Art 435(2) b and c

The strategy of the Association and the corresponding Fit & Proper Policies of the central organisation of the Association of Volksbanks (VOLKSBANK WIEN AG) and of the affiliated banks constitute the basis for the selection, strategic

succession planning, and the suitability assessment of the members of the management bodies and are in line with the professional values and long-term interests of the Association of Volksbanks.

Additionally, the principles and processes for selecting members of the Managing Board and for the required strategic succession planning as well as for ensuring the individual and collective knowledge and skills – taking into account Fit & Proper criteria – are regulated within the framework of the “General Instruction on the Appointment of Managers” (cf. Section 30a of the Austrian Banking Act and the Association Agreement of the Volksbanks).

In addition to Fit & Proper criteria, the decisive selection criterion is an understanding of how to take into account the interests and strategy of the Association of Volksbanks and to ensure the highest possible efficiency in performing the duties of the management body.

The “Guidelines on the assessment of the suitability of members of the management body and key function holders” (EBA/GL/2021/06, “Fit & Proper Guidelines”) define uniform minimum requirements for the assessment of the personal reliability, professional suitability and experience of persons in management and control functions, including their suitability as a body, in credit institutions throughout Europe. Every Austrian credit institution must comply with the guidelines, taking into account the type, scope and complexity of the transactions as well as the risk structure, hence also taking account of the Fit & Proper Guidelines. This obligation is met by the credit institutions’ “Fit & Proper Policies” coordinated across the Association, in particular the obligation to implement internal guidelines for the selection, assessment and safeguarding of the suitability of managing directors, supervisory board members and key function holders.

In the General Instruction “Appointment of Managers”, criteria for the appointment, independence, assessment of individual and collective suitability were defined and the required documents and the (succession) process to ensure suitability as well as ad hoc re-evaluation were documented.

Members of the management body are subject to specific requirements in relation to their professional and personal competences, their impartiality and independence by virtue of their responsibility for the management and supervision of the institution. The required knowledge, skills and experience of each individual in relation to the collective requirements for the composition of the relevant boards ensure that well-informed competent decisions are made based on a good understanding of the business, the risks and governance structure of the Association of Volksbanks and on the relevant persons’ knowledge of the regulatory framework.

The respective requirements depend on the type, structure, size and complexity of the business activity of the institution and of the Association as well as on the respective functions to be filled. In addition to professional competence, the persons concerned must also meet the required personal qualifications. All members must be personally reliable and in good standing.

The positive evaluation of the suitability assessment must be carried out as part of the initial appointment and must be evaluated regularly. Ongoing suitability is ensured through regular training and continuing education measures and related policies. Therefore, measures (in particular (on-the-job) training or organisational measures) must be taken, in particular in the event of changes in external circumstances (e.g. changes in business activities or new regulatory requirements in the organisational structure) which might influence the suitability of individual or several members of the Managing Board or Supervisory Board.

Diversity strategy for the selection of members of the management body, objectives and relevant targets of the strategy, degree of target achievement

CRR Art 435(2) c)

The Association has set itself the strategic goal, pursued for substantial reasons, to generally qualify women for management positions, thus increasing the share of women in all management positions, also in managing board functions.

This increase is supported by a great number of measures, processes and programmes (diversity programmes, human

capital development, gender pay equality programmes etc.).

Moreover, care must be taken, in the course of the tender and appointment procedure for managing board positions supported by external partners, to also nominate female candidates under all circumstances and to implement adequate succession planning procedures. These measures provide the basis for a succession process where vacant management positions (including managing board positions) can be filled with both internal and external female candidates.

The success of these measures is measurable. The Association managed to increase the proportion of female executives (including managing board positions) by 5.6 % in the period from 31 December 2023 to 31 December 2024.

If they had to set up a nomination committee in accordance with Section 29 of the Austrian Banking Act, the banks of the Association must set target quotas for the underrepresented gender on the managing board and supervisory board. Appropriate target quotas (20-30 %) were defined and are achieved. The requirements of the act on equal opportunities for women and men on supervisory boards (GFMA-G) are met.

Information on the Risk Committee

CRR Art 435(2) d) – The following institutions have formed a Risk Committee:

| Volksbank | Number of meetings held in 2024 | Number of meetings held in 2023 | Number of meetings held in 2022 | Number of meetings held in 2021 |
|---|--|--|--|--|
| VOLKSBANK WIEN AG *5 | 4 | 4 | 4 | 4 |
| Österreichische Ärzte- und Apothekerbank AG | 3 | 3 | 3 | 3 |
| Volksbank Oberösterreich AG | 4 | 4 | 4 | 4 |
| Volksbank Kärnten eG *2 *7 | 0 | 0 | 4 | 4 |
| Volksbank Niederösterreich AG *6 | 0 | 0 | 0 | 0 |
| Volksbank Salzburg eG *1 | 4 | 4 | 4 | 4 |
| Volksbank Steiermark AG *3 | 0 | 0 | 0 | 0 |
| Volksbank Tirol AG | 4 | 4 | 4 | 4 |
| VOLKSBANK VORARLBERG e. Gen. *4 | 1 | 1 | 1 | 1 |

*1 The Risk Committee of VB Salzburg eG was re-established as a separate committee in FY 2020.

*2 The Risk Committee was reintroduced by Supervisory Board resolution dated 16 September 2020 and meets as a combined Credit and Risk Committee

*3 The Risk Committee of VB Steiermark was dissolved with effect from 31 May 2019.

*4 The Risk Committee of VB Vorarlberg was re-established as a separate committee in FY 2020.

*5 VOLKSBANK WIEN AG has formed a risk committee in accordance with Section 39d of the Austrian Banking Act, which is referred to as the Working and Risk Committee.

*6 VB Niederösterreich AG dissolved the committee under the by-laws in 2022.

*7 The Risk Committee was dissolved with effect from 31 December 2023.

Information flow to the management body

CRR Art 435(2) e)

The reporting framework implemented within the Association of Volksbanks is meant to ensure that all significant risks are fully identified, monitored and efficiently managed promptly. The reporting framework offers a holistic and detailed presentation of the risks and a specific analysis of the individual risk types.

The monthly – or for the risk-bearing capacity calculation and capital ratios: quarterly – aggregate bank risk report serves as a core element of the reporting framework. The aggregate bank risk report provides a summary of the situation and development of the RAS indicators, the utilisation of the risk-bearing capacity, addressing all significant risks and containing

comprehensive qualitative and quantitative information, among others. The aggregate bank risk report provides the CO Managing Board with management-related information on a monthly basis and is sent to the Supervisory Board of VBW quarterly. In addition to the aggregate bank risk report, various risk-specific reports (e.g. analyses within credit risk regarding the development of individual sub-portfolios) complement the reporting framework.

Compliance with BaSAG indicators is reported in the Risk Committee to the CO Managing Board.

Risk reporting takes place in the appropriate committees (i) Risk Committee, (ii) Asset Liability Committee, (iii) Credit Committee. For details, please refer to the section entitled "General information on risk management".

3 Remuneration policy of VOLKSBANK WIEN AG

CRR Art 450(1) (a), EU REMA

3.1 Governance of the remuneration policy

CRR Art 450 (1) (a), EU REMA (a), (b)

Under Art 10 of the CRR, Section 30a of the Austrian Banking Act and under the Association Agreement, VOLKSBANK WIEN AG as the central organisation (CO) of the Association of Volksbanks is obliged to issue a General Instruction on remuneration policy for the entire Association of Volksbanks. As CO of the Association of Volksbanks, VBW is responsible for compliance with the remuneration principles set down in the annex to Section 39b Austrian Banking Act within the entire credit institution group. The remuneration policy of the Association of Volksbanks is in line with the business and risk strategy as well as the general risk management mechanisms, and it supports the long-term interests of the Association of Volksbanks.

Preparation, implementation and monitoring of the remuneration policy

The preparation as well as the continuous maintenance, updating and development of the General Instruction (GI) and of the Association's working instruction on remuneration policy are the responsibility of the HR Management function of the CO, in consultation with the CO Managing Board. The relevant decisions are made by the Remuneration Committee of VOLKSBANK WIEN AG. The remuneration policy is checked by the CO HR Management function for up-to-dateness at least once a year and revised accordingly. This review includes making sure that the remuneration policy is gender-neutral. In 2024, the remuneration policy was reviewed and supplemented by reinforcing the involvement of Compliance in the remuneration process, as well as harmonising the remuneration structure of managing board members within the Association of Volksbanks.

The corresponding internal functions – i.e. HR Management, Compliance, Risk Control, and Finance – as well as the Supervisory Board and/or the Remuneration Committee, as well as the Working and Risk Committee are closely involved in the review of the remuneration policy, including identification of the material risk takers pursuant to Section 39b Austrian Banking Act and granting employee profit-sharing. This is meant to ensure that the remuneration policy is geared to the business and sustainability strategy and that it supports the risk management framework of the affiliated banks.

Under the working instruction of the Association (Association WI) on remuneration policy, the GI must be implemented in all affiliated banks. The Association WI serves as a “transparency document” ensuring implementation in line with the GI in the respective affiliated banks. The directives of the General Instruction and of the Association WI shall be considered as minimum requirements. The local managing board as well as the Remuneration Committee or the supervisory board of the respective affiliated bank must approve the Association WI.

Scope of the remuneration policy

VOLKSBANK WIEN AG and the affiliated banks are also responsible for compliance with the remuneration principles set down in the annex to Section 39b Austrian Banking Act by the other companies and subsidiaries included in the scope of consolidation. Hence, each affiliated bank of the Association of Volksbanks must ensure that even group companies that are no credit institutions themselves are integrated in risk control activities under Section 39b Austrian Banking Act, and that remuneration policies and practices exist in these companies that comply with the annex to Section 39b Austrian Banking Act and with the remuneration policy of the Association of Volksbanks based thereon.

The respective affiliated bank of the Association of Volksbanks comprises the following companies that are fully consolidated at the level of the Association:

| VOLKSBANK (affiliated credit institution) | Legal Entities | CRR Consolidation | IFRS Consolidation |
|--|---|----------------------|-----------------------|
| ÖSTERREICHISCHE ÄRZTE- UND APOTHEKERBANK AG | - | Yes | Yes |
| VOLKSBANK KÄRNTEN eG | VB Aktivmanagement GmbH | Yes | Yes |
| | >> VB-Immobilienverwaltungs- und -vermittlungs GmbH | Yes | Yes |
| | VB Kärnten Leasing GmbH | Yes | Yes |
| | >> VB Buchführung GmbH | Yes | Yes |
| VOLKSBANK NIEDERÖSTERREICH AG | - | Yes | Yes |
| VOLKSBANK OBERÖSTERREICH AG | - | Yes | Yes |
| VOLKSBANK SALZBURG eG | BBG Beratungs- und Beteiligungsgesellschaft m.b.H. | Yes | Yes |
| | >> Domus IC Leasinggesellschaft m.b.H. | Yes | Yes |
| VOLKSBANK STEIERMARK AG | - | Yes | Yes |
| VOLKSBANK TIROL AG | - | Yes | Yes |
| VOLKSBANK VORARLBERG e. Gen. | Volksbank Vorarlberg Marketing- und Beteiligungs GmbH | Yes | Yes |
| | >> Volksbank Vorarlberg Leasing GmbH | Yes | Yes |
| | >> Volksbank Salzburg Leasing Gesellschaft m.b.H. | Yes | Yes |
| VOLKSBANK WIEN AG | VB Services für Banken Ges.m.b.H. | Yes | Yes |
| | VB Infrastruktur und Immobilien GmbH | Yes | Yes |
| | 3V-Immobilien Errichtungs-GmbH | Yes | Yes |
| | VB Verbund-Beteiligung Region Wien eG in Liqu. | Yes | Yes |
| | VOBA Vermietungs- und Verpachtungsges.m.b.H. | Yes | Yes |

The companies listed above are subsidiaries that are directly affected by the remuneration policy. It cannot be excluded that other companies may be affected as well, e.g. controlled companies.

Supervisory Board committees that deal with remuneration policy

Remuneration Committee

The Supervisory Board of VOLKSBANK WIEN AG has formed a Remuneration Committee which, among other things, is responsible for the remuneration agendas under Section 39c of the Austrian Banking Act.

The Remuneration Committee consists of Supervisory Board members as well as works council representatives. Christoph Herzog acts as remuneration expert. The main tasks of the Remuneration Committee include the approval, monitoring and implementation of the remuneration policy, the remuneration practices, as well as of the remuneration-related incentive structures. These tasks relate to the control, monitoring and limitation of risks under Section 39 (2b) (1) to (10) Austrian Banking Act, of available own funds and liquidity. Moreover, the long-term interests of shareholders, investors and employees of the entire Association of Volksbanks must be considered. The Remuneration Committee is authorised to make decisions within its allocated sphere of competence.

In 2024, the Remuneration Committee met on two occasions. In these meetings, the committee dealt with the following topics: the remuneration policy and practices, the granting and disbursement of employee profit-sharing, identifying the material risk takers under Section 39 b of the Austrian Banking Act, the increased involvement of the Compliance department in the remuneration process, as well as the harmonisation of the remuneration structure for managing board members within the Association of Volksbanks.

Working and Risk Committee

Annual reporting takes place in the Working and Risk Committee of VOLKSBANK WIEN AG about the remuneration system of the Association of Volksbanks. The Committee is also involved in reviewing remuneration policy, identifying material risk takers and granting and disbursement of the employee profit-sharing. In 2024, the Working and Risk Committee discussed the remuneration policy on two occasions.

Boards of the affiliated banks

The following boards are responsible for remuneration policy at the respective affiliated banks of the Association of Volksbanks:

| VOLKSBANK (affiliated credit institution) | Supervisory Board Committees |
|--|------------------------------|
| ÖSTERREICHISCHE ÄRZTE- UND APOTHEKERBANK AG | Supervisory Board |
| VOLKSBANK KÄRNTEN eG | Personnel Committee |
| VOLKSBANK NIEDERÖSTERREICH AG | Supervisory Board |
| VOLKSBANK OBERÖSTERREICH AG | Supervisory Board |
| VOLKSBANK SALZBURG eG | Remuneration Committee |
| VOLKSBANK STEIERMARK AG | Supervisory Board |
| VOLKSBANK TIROL AG | Supervisory Board |
| VOLKSBANK VORARLBERG e. Gen. | Remuneration Committee |
| VOLKSBANK WIEN AG | Remuneration Committee |

Affiliated banks with total assets exceeding euro 5 billion are obliged to establish a remuneration committee under Section 39 c Austrian Banking Act, meaning that, at present within the Association of Volksbanks, this obligation only affects VOLKSBANK WIEN AG.

In 2024, the relevant board of the respective affiliated bank discussed the remuneration policy on two occasions, the focus being on reviewing the existing remuneration principles and practices, on granting and disbursing employee profit shares, on identifying risk takers pursuant to Section 39b Austrian Banking Act, on intensified involvement of Compliance in the remuneration process, as well as on harmonising the remuneration of managing board members within the Association of Volksbanks.

Role of control functions

The control units of VOLKSBANK WIEN AG (Compliance, Risk Control, and Internal Audit) act as 2nd and 3rd line of defence for VOLKSBANK WIEN AG and the respective affiliated bank of the Association of Volksbanks. They are actively and regularly working together and cooperating with other functions and committees to develop the remuneration policy and practices.

As 2nd line of defence, **Compliance** regularly checks the remuneration policy and practices of the Association of Volksbanks. They perform internal controls of remuneration practices, validating internal reports regarding remuneration claims of employees with board functions, they identify the material risk takers under Section 39b Austrian Banking Act, they perform the annual review of the remuneration policy and the introduction or update of the bonus model. This way of procedure guarantees that remuneration policies and laws are fully complied with. The Compliance function regularly checks if the remuneration practices live up to ethical standards and corporate values, to ensure the integrity and effectiveness of the remuneration policy. Compliance reports quarterly in the Managing Board meeting, in the Audit Committee and in the Supervisory Board, with one essential topic being the review of the remuneration policy.

As part of the 2nd line of defence, **risk management**, which is assumed by the Risk Control unit of VOLKSBANK WIEN AG as CO within the Association of Volksbanks, is always integrated in the definition of the remuneration policy, the bonus model and in the assessment process for identifying material risk takers of the respective affiliated bank, and it is adequately involved in designing and monitoring the remuneration systems.

Internal Audit, as 3rd line of defence, carries out an independent review of the design, implementation and effects of the remuneration policy of the Association of Volksbanks once a year. It reports on the results relating to the remuneration policy of the Association of Volksbanks in the Remuneration Committee annually.

Identification of risk takers under Section 39b Austrian Banking Act

The categories of employees whose professional activities have a significant impact on the risk profile of the respective affiliated bank (material risk takers) comply with the requirements of EBA/RTS/2020/05. The identification of material risk takers follows a structured and formalised assessment process at both Association and affiliated bank level on the basis of the guidelines laid down by the CO, involving the Risk Control and Compliance functions, in order to guarantee a common standardised approach at Association level.

For the recognition of identified employees with a significant impact on the risk profile of the respective affiliated bank, the role, decision-making authority regarding management responsibility, and the total annual remuneration are taken into account.

The respective affiliated bank conducts an annual self-assessment in the first quarter of each calendar year for the previous year to identify all employees whose professional activities have or may have a significant impact on the risk profile of the institution. The self-assessment is based on the qualitative and quantitative criteria set out in EBA/RTS/2020/05. The risk analysis is updated during the year as well, at least regarding the qualitative criteria of EBA/RTS/2020/05, to ensure that all employees to whom any of the qualitative criteria may apply for at least three months of the financial year are identified as material risk takers. This is particularly the case with new hires or transfers involving the assumption of new functions or responsibilities, or changes in business strategy.

Based on the qualitative criteria, the following key risk takers are identified:

- 1) Supervisory board members;
- 2) Managing board members;
- 3) Senior management (managing board – level 1);
- 4) Senior employees in Sales (managing board – level 1) who report directly to the managing board;
- 5) Senior employees in control functions, including senior management in Compliance and Risk Control as part of the second line of defence, and Internal Audit as part of the third line of defence;
- 6) Voting members of the Risk Committee, Asset Liability Committee (ALCO), Credit Committee;
- 7) Employees who manage a division that is responsible for legal matters, finance incl. taxes and budgeting, human resources, remuneration policy, information technology, economic analysis, money laundering and the financing of terrorism, accounting, information security, and outsourcing;
- 8) Senior management authorised to decide on, to approve or prohibit any relevant risk, or who are voting members of a committee authorised to take the aforementioned decisions;
- 9) Senior management authorised to decide on the approval or rejection of the launch of new products.

The criteria for identifying material risk takers cover all types of risk that are part of the risk strategy. The risk profile and risk limits of the major divisions with an RWA utilisation of more than 2 % of risk-weighted assets as well as their control, determination and monitoring are also considered as criteria for identifying the risk takers.

The most important criterion for identifying the employees in qualitative terms is not the job title, but the authorities and responsibilities associated with the function.

Based on the quantitative criteria, the following employees are identified:

- a) Employees whose remuneration amounted to at least euro 500,000.00 and corresponded to at least the average remuneration of the members of the supervisory board (excl. works council members of the supervisory board without remuneration), of the managing board and of the senior management of the institution;
- b) Employees whose remuneration amounted to at least euro 750,000.00 in the previous financial year (including the employees explicitly mentioned in item a);
- c) Employees counting among the 0.3 % of employees who received the highest amount of total remuneration in the previous or current financial year.

In the year under report, a total of 275 material risk takers pursuant to Section 39b Austrian Banking Act were identified in the Association of Volksbanks – three of which based on quantitative criteria. Material risk takers represent 8.8 % of all employees and were determined based on qualitative as well as quantitative criteria.

The material risk takers are determined by the respective committee of the affiliated bank.

3.2 Structure and design of the remuneration system

CRR Art 450 (1) (c) to (f), EU REMA (b) to (g)

Reasonable and sustainable remuneration policy

The remuneration policy of the Association of Volksbanks provides for reasonable, market-compliant, sustainable and gender-neutral remuneration. The remuneration policy does not create any incentives to take on excessively high risks, including sustainability risks.

A guiding principle of the remuneration system is that the total remuneration is market-compliant with reference to the external market (competitors in the banking and financial services sector on the Austrian labour market). Criteria for assessing market conformity are the function, professional and personal qualifications, (relevant) experience as well as the results of internal comparisons in salary studies. Internal methodologies for determining internal bandwidths were developed based on this.

Remuneration is governed by collective agreements, employer/works council agreements and/or individual agreements.

Fixed remuneration

The fixed remuneration within the Association of Volksbanks meets the following prerequisites:

- a) Set in advance;
- b) Non-discretionary (reflecting the extent of the employee's professional experience and length of service, and not subject to anybody's discretion);
- c) Transparent;
- d) Permanent over a period for the specific function and responsibility;
- e) Not revocable, except through collective bargaining or renegotiation in line with national salary adjustment criteria;
- f) Payments cannot be reduced, suspended or cancelled unilaterally by the bank;
- g) No incentive for assumption of risks;
- h) Not performance-related.

The fixed remuneration mainly reflects the person's relevant professional experience, activities performed, and the organisational responsibility within the respective affiliated bank. Basically, the following components are classified as fixed remuneration: gross total amount of all payments or benefits (incl. non-cash benefits) the disbursement of which does not depend on any performance within the Association of Volksbanks or on the economic result (e.g. additional voluntary social benefits such as anniversary bonuses, insurance contributions within the scope of company pension schemes, severance payments under the old or new system).

Variable remuneration

Within the Association of Volksbanks variable remuneration is limited to the models defined in the remuneration policy.

The following special remuneration components are classified as variable remuneration and are not permitted in the Association of Volksbanks as a matter of principle:

- Allowances that do not meet the criteria for fixed remuneration (e.g. performance-related allowances);
- Variable remuneration based on future performance;
- Guaranteed variable remuneration ("welcome bonus", "sign on bonus", "minimum bonus", etc.);
- Voluntary performance-based retirement benefits;
- Compensation or severance payments for prior employment;
- Retention bonuses.

The total pool of variable remuneration must not restrict the ability of the Association of Volksbanks or of the respective affiliated bank to improve its own funds base. A circumvention ban applies to all employees. Insurances and hedging strategies are not admissible for the purpose of compensating variable remuneration payments.

Within the association of credit institutions, salary components such as allowances, fringe benefits, contributions to pension schemes and the like are designed in such a way that they basically meet the criteria of fixed remuneration.

Proportion between fixed and variable remuneration

The variable remuneration component should not be too high, thus providing an incentive for reckless risk-taking. The variable remuneration is limited to a maximum of 100 % of the fixed remuneration (ratio 1:1). Any increase to a maximum of 200 % of the fixed part is only admissible by resolution of the general meeting.

Remuneration in the form of instruments

Pursuant to the annex to Section 39b (11) Austrian Banking Act, a significant part amounting to at least 50 % of variable remuneration components consists in a reasonable proportion of equities or equivalent participations, share-linked instruments or equivalent non-cash means of payment, or capital instruments. As no instruments are available within the Association of Volksbanks, number 11 is not applicable.

Deferred variable remuneration

Under number 13 (a), affiliated banks with total assets amounting to less than euro 15 billion (average of the last 4 years) are exempt from deferring the variable remuneration. In accordance with number 13 (b), regardless of the size of the institution, variable remuneration components of all employees, the amount of which does not exceed euro 50,000.00 and does not account for more than a third of the total annual remuneration of the respective employee need not be deferred. Therefore, no variable remuneration components are deferred within the Association of Volksbanks.

Ex-post risk adjustment

'Malus' and clawback are used for ex-post risk adjustment. These are explicit mechanisms for subsequent risk adjustment, where the affiliated bank itself adjusts the remuneration of the relevant employee based on said mechanisms. Part or all the deferred variable remuneration is forfeited in a malus case. Catching up is not permitted for the annual portions omitted. Clawback is used to reclaim any variable remuneration that has already been paid out. The following cases may constitute a clawback event:

- any significant contribution to the poor financial situation,
- wilful or grossly negligent breaches of duty of care,
- fraud,
- violations of statutory provisions or regulatory requirements to protect customers' interests, if determined by the regulatory authorities or by a court.

Ex-post risk adjustments are performance- or risk-based.

Severance payments

Uniform legal rules apply to all employees, including managing board members and all other identified employees. Voluntary severance payments are only permitted in connection with restructuring operations. The severance payments must not be higher than the opportunity costs that would arise in connection with or as an alternative to the premature termination of contracts and are limited to a maximum of two years of gross salary. Opportunity costs must be estimated within the scope of a business case, considering the alternative costs such as salary costs, ancillary wage costs, court and litigation costs, legal fees, etc., and must be documented in a verifiable manner.

Early retirement scheme

Employees are not entitled to any early retirement scheme. Within the framework of statutory partial retirement, working hours can be continuously reduced by 40 % to 60 %. Compensation is paid in the amount of 50 % of the difference if working hours are reduced by 40 %. In exceptional cases, a block model may be agreed. Access to partial retirement is possible at the earliest five years before reaching the standard retirement age.

Remuneration of specific functions

Remuneration of supervisory board members

The supervisory board members exclusively receive fixed remuneration. Incentive mechanisms based on the performance of the respective Volksbank are excluded. Under Section 98 Austrian Stock Corporation Act, the shareholders' general meeting approves the remuneration of supervisory board members. The remuneration must correspond to the economic situation of the company. The adequacy of the remuneration of supervisory board members within the scope of adjusting the remuneration is verified by Compliance and HR Management of VBW as CO.

Remuneration of managing board members

Managing board members receive fixed remuneration that is stable and independent of the risk appetite of the banks of the Association. Success or performance-related components do not currently form part of the remuneration policy for managing board members.

Fixed remuneration includes the basic salary and other additional and fringe benefits.

Basic salary

The amount of the basic salary of the managing board members is determined on an extended basis using criteria defined in the remuneration policy for all employees:

- a) **personal criteria**, such as professional and personal qualifications, as well as relevant/applicable experience,
- b) **function-related criteria**, such as the role of the managing board member, internal comparisons with similar positions within the bank, salary studies within the industry, and the complexity of the corporate structure and size of the company.

Discussions regarding the personal criteria and the determination of the proposal for the remuneration of the managing board member are documented on an audit-proof and detailed basis in the respective affiliated bank and by the responsible supervisory board committee and recorded in the minutes of the responsible supervisory board committee. The results recorded are made available to the CO to allow a complete evaluation.

Adjustments to the basic salary are evaluated and are implemented if applicable within the scope of contract extensions.

Additional and fringe benefits

a) Retirement benefits:

Managing board members receive retirement benefits through a statutory employee pension fund and a defined contribution pension plan via the BONUS pension fund. The company covers the contributions in full. The regulations are based on specifications from collective bargaining agreements and are also relevant for managing board activities. The contributions form part of the fixed remuneration and are based on standard market benchmarks.

b) Supplementary insurance:

Managing board members can receive supplementary insurance (health, casualty, life insurance) that covers personal risks. The company covers the costs of these in full.

c) Benefits in kind:

All managing board members are entitled to a company car with a parking space and this car may be used for private purposes without any restrictions.

The supervisory board is responsible for structuring the remuneration systems for the managing board members and must ensure that this is commensurate with the tasks and responsibilities of the managing board, and with the economic situation of the respective affiliated bank. External comparisons are used to assess the appropriateness and market-conformity of the remuneration of managing board members. The managing board members are excluded from disbursements under the employee profit-sharing scheme.

Remuneration of identified employees

All identified employees receive a fixed remuneration that reflects their professional experience and organisational responsibility. In 2024, an employee profit-sharing was paid out to them, similar to all employees, by full-time equivalent. The members of the supervisory board and of the managing board of the respective affiliated banks are excluded from this.

Remuneration of control functions

Employees holding control functions are independent of the business units they control, have sufficient authority and are remunerated irrespective of the performance of the business units they control. The adequacy of the annual remuneration

of senior management in Risk Control, Compliance and Internal Audit is reviewed annually by the Remuneration Committee of VOLKSBANK WIEN AG. Senior management in Risk Control, Compliance and Internal Audit of VOLKSBANK WIEN AG assumes the relevant function at the Volksbanks as well. In 2024, the employee profit share for employees holding control functions was paid out according to their full-time equivalent.

Remuneration of sales and lending staff

No incentives were paid out (either monetary and/or non-monetary forms of remuneration) that lead to a situation where the sales representatives put their own interests or the interests of the respective Volksbank above those of consumers. No individual or performance-related variable remuneration is paid to sales and lending staff. In 2024, the employee profit share for employees in sales and lending roles was paid out according to their full-time equivalent.

3.3 Bonus system of the Association of Volksbanks

CRR Art 450(1) (b), (e), (f), EU REMA (a), (c), (e), (f), (g)

The bonus model is based on an employee profit-sharing model and considers the cooperative idea, aiming to motivate employees for subsequent periods. It provides for bonus amounts per FTE, which are determined regardless of the salary level of the employees. The bonus model provides for a bonus payment to all employees (=profit-sharing scheme). Starting at a certain threshold, employees in Sales are then paid an additional bonus (=“upside Sales”).

The bonus model established hereby is directly coupled to the business results at Association level, tying bonus payments to profitability, risk and return. The bonus pot is defined at the level of the Association and then broken down to the individual affiliated banks based on the FTE share. The companies' individual bonus pools are then adjusted taking account of profit, risk indicators, qualitative criteria, and sustainability indicators.

All targets and thresholds are approved annually in the December Remuneration Committee of VOLKSBANK WIEN AG for the subsequent year. The individual targets of the affiliated banks are defined by resolution in the December meetings of the competent supervisory boards.

The following criteria and prerequisites are applied to the distribution of the Association's bonus pool:

- 1) Capital & liquidity minimum requirements of the Association (Risk Appetite Statement, CET1 capital ratio, Association limit or RAS liquidity coverage ratio limit) are met. K.O. criterion: if the respective Association limit is not reached, no bonus may be paid out in any affiliated bank.
- 2) Allocations must be made to the bonus pool of the Association. K.O. criterion: if the respective threshold (profit target of the Association) is not reached, no bonus may be paid out in any affiliated bank.
- 3) The bonus pool of the Association is distributed on the basis of the FTE of the respective affiliated bank.

The local bonus pool allocated based on the profit target may not entirely or not adequately reflect actual risks, therefore ex-ante risk adjustments must be effected. This ensures that the variable remuneration takes account of the risks assumed. The allocated bonus pool may be adjusted by no more than $\pm 15\%$ per target. Any upward correction is only possible upon approval by the Remuneration Committee of VOLKSBANK WIEN AG, and the total of the corrections [made by] the companies cannot exceed 100 % of the bonus pool originally allocated.

The targets of the respective company include specified risk targets (NPL ratio), customer satisfaction targets (Net Promoter Score) and sustainability targets (reduction in total emissions (corporate carbon footprint) and an increase in the proportion of female executives).

The bonus model does not provide for any remuneration exceeding euro 50,000.00 and/or more than a third of the total annual remuneration of the relevant employee. Therefore, the variable remuneration is not deferred.

The current bonus model of the association of credit institutions (employee profit-sharing scheme) is tied to the overall performance of the company, and not to individual employee targets.

The bonus for 2024 is disbursed according to the resolutions passed in the relevant bodies. The general prerequisite for entitlement to this is active employment on 31 December of the calendar year in question. The entitlement is calculated on a pro rata basis for employees who start at the company during the year. The amount of the bonus is based on the employment level as at 31 December of the year in question and is calculated on a pro rata basis for part-time employees.

3.4 Harmonisation of remuneration, risk culture, and sustainability

CRR Art 450 (1) (b) to (f), EU REMA (c)

The remuneration policy of the Association of Volksbanks is consistent with sound and effective risk management, supporting the same, and does not encourage risk-taking beyond what has been defined by the central organisation in the risk strategy of the Association.

The criteria for determining the fixed and variable remuneration components are set in such a way that employees will always act in the interest and with a view to the benefit of the Association of Volksbanks and in line with the company's risk culture and risk appetite. The conduct of employees complies with the value system and the Code of Conduct, and they act within the set risk tolerances.

3.5 Integration of sustainability in performance management

The remuneration policy is designed to encourage sustainable and risk-conscious corporate governance. In line with regulatory requirements and with the business strategy, sustainability goals (including ESG criteria) are being integrated into performance management of managing board members and senior management at the respective affiliated bank in the first half of 2025.

Linking of the remuneration policy with sustainability goals

The remuneration policy has been adjusted to support the strategic sustainability goals of the Association of Volksbanks. Sustainability risks are considered with this by:

- establishing sustainability goals as an integral part of individual performance assessments for managing board members and executives in senior management.
- incorporating ESG criteria and KPIs into the assessment of corporate objectives, which are used as a basis for variable remuneration for employees (i.e. employee profit-sharing scheme, except for managing board members).
- using the long-term reduction in climate-related risks and the promotion of sustainable financing strategies as benchmarks for performance expectations.

Various social sustainability factors are considered in the aim of supporting the sustainable direction and long-term value creation of the Association of Volksbanks. This includes compliance with labour law standards and comprehensive employee protection and health and safety. Reasonable fixed and variable remuneration in line with the sustainable and cooperative business model is just as crucial as fair working conditions, diversity in practice and targeted opportunities for training and further education. Measures aimed at combating inequality and promoting social cohesion also play a part in strengthening social sustainability within the Association.

Accountability for achieving the sustainability goals

Accountability for the sustainability goals is also ensured without variable remuneration through clear control mechanisms, regular reporting and embedding within the strategy. Sustainability goals are an integral part of annual performance assessments for managing board members and senior management from 2025 onwards. Achievement of the goals is discussed in employee appraisals and annual financial statements and documented transparently in the Annual Reports. The supervisory board monitors this process and regularly requests progress reports, introducing measures as necessary to ensure that goals are achieved.

Public sustainability reports also ensure transparency in relation to stakeholders. Regular communication with investors, customers and other stakeholders ensures that sustainability remains embedded within the strategy. The goals are integrated into the business strategy and business development over the long term and have a significant impact on the bank's reputation and market position. Managing board members are under an obligation to provide continuous reporting on progress and challenges, which further strengthens establishment of a sustainable corporate culture.

3.6 Gender-neutral remuneration policy

The remuneration policy of the Association of Volksbanks is gender-neutral, establishing the principles of equal pay as well as work of equal value for all employees.

To ensure performance-adequate and gender-neutral remuneration, the Association of Volksbanks has developed and implemented tools like the competence model, internal job profiles and job descriptions. The competence model defines the skills that employees need to have, while internal job profiles are based on objective criteria, defining specific activities, skills and modes of behaviour. Job descriptions offer a comprehensive overview of the positions, regardless of any specific persons.

The structured process of analysing equal pay gaps and gender pay gaps remains a factor with respect to equal treatment and equal opportunities. Every year – as part of the remuneration report for the supervisory board and/or Remuneration Committee – differences between the average male and female remuneration are documented and explained and appropriate measures are taken to equalise these differences where necessary. The gender pay gap can still mainly be attributed to the fact that men are disproportionately represented in higher-paid professions and positions, while women are more likely to work in lower-paid jobs. These structural differences have a direct impact on the gender pay gap.

In addition, gender-specific pay gaps are calculated using the median, which allows for a more accurate assessment of typical differences in pay and helps to uncover unequal distribution of women and men in different pay structures.

In addition to continuous analysis and the salary adjustments arising from this, we have implemented further measures within the scope of gender equality management:

- **Increasing the proportion of female executives:** A key objective within our strategy of reducing the gender pay gap is to increase the proportion of women in executive roles. We have been able to increase the representation of women at senior management levels on a sustainable basis through targeted programmes, mentoring and intensified gender recruitment measures. This plays a role in reducing salary differences at the executive levels.
- **Gender recruitment:** We have developed targeted programmes to bring more women into roles that are rated more highly and to increase the representation of women in executive roles.
- **Mentoring programmes:** These programmes provide targeted support to women in their career development and help them overcome obstacles on their way towards leadership roles.
- **Transparent application processes:** We promote equal opportunities in internal and external recruitment by designing a clearly structured and transparent application process.

3.7 Application of exceptions to the remuneration policies: Article 450 paragraph 1 letter k CRR and the CRD criteria

CRR Art 450(1) (k), EU REMA (i)

Referring to the requirements under Article 450 paragraph 1 letter k of the CRR, regarding the disclosure of exceptions under Article 94 paragraph 3 of the CRD, we would like to make clear that VOLKSBANK WIEN AG as well as the Association of Volksbanks do not make use of any such exceptions at consolidated level. Hence, no application of exceptions under Article 94 paragraph 3 letter a or b of the CRD is applicable to either the VBW credit institution group or the Association of Volksbanks.

3.8 Summarised quantitative information on remuneration

CRR Art 450(1) (g) to (i), EU REMA (h), (j), EU REM1, EU REM2, EU REM3, EU REM4, EU REM5

This quantitative information is disclosed in tabular form in the document "Offenlegung_Verbund_2024-12-31.xlsx".

4 Group structure and scope

4.1 Scope

CRR Art 436 (a), (f) to (h), EU LIB

VOLKSBANK WIEN AG (VBW), with its registered office at Dietrichgasse 25, 1030 Vienna, is the central organisation (CO) of the Austrian Association of Volksbanks. VBW has concluded an association agreement with the primary banks (Volksbanks, VB) in accordance with Section 30a of the Austrian Banking Act. The purpose of this association agreement is, on the one hand, the formation of a cross-guarantee system between the institutions of the primary sector and, on the other hand, the supervision and fulfilment of the supervisory standards at Association level. Section 30a (10) of the Austrian Banking Act requires an association's central organisation to have the right to issue instructions to the affiliated banks.

The annual financial statements of the Association of Volksbanks are basically prepared in accordance with all the latest valid versions of the IFRS/IAS as at the balance sheet date, as published by the International Accounting Standards Board (IASB), as well as with all interpretations of the International Financial Reporting Interpretation Committee (IFRIC) and Standing Interpretations Committee (SIC), if adopted by the European Union in its endorsement process, and with additional requirements pursuant to Section 245a of the Austrian Business Code and Section 59a of the Austrian Banking Act.

The regulatory provisions of Parts 2 to 8 of Regulation (EU) no. 575/2013 as well as Section 39a Austrian Banking Act must be met by the Association of Volksbanks on the basis of the consolidated financial situation (Section 30a (7) of the Austrian Banking Act). By letter dated 29 June 2016, the European Central Bank (ECB) granted perpetual approval of the Association of Volksbanks without further requirements.

Section 30a (7) of the Austrian Banking Act obliges the CO to prepare consolidated financial statements in accordance with Sections 59 and 59a Austrian Banking Act for the Association of Volksbanks. The annual financial statements of the Association of Volksbanks are prepared in accordance with a set of rules based on the International Financial Reporting Standards (IFRS). For full consolidation purposes, Section 30a (8) of the Austrian Banking Act specifies that the CO is to be regarded as parent institution, while each affiliated bank and, under certain conditions, each transferring legal entity, is to be treated as a subordinated institution.

In accordance with IFRS, a full consolidation can only take place if a company has decision-making authority for the associated company, hence, if it has the ability to influence returns on equity by its power of disposition (IFRS 10.6). The CO has the right to issue instructions, but doesn't receive any return flows from the affiliated banks; therefore the CO has no control as defined by IFRS 10. In the absence of an ultimate controlling parent company, a consolidated presentation can only be prepared in the sense of a group of equals, despite the CO's extensive powers to issue instructions. It was therefore necessary to define a set of rules for the preparation of the annual financial statements of the Association of Volksbanks.

In the 2024 financial year, there were no substantive, practical or legal impediments to the transfer of own funds or the redemption of liabilities between the parent institution and its subordinate institutions.

4.2 Differences between accounting and supervisory purposes

CRR Art 436 (b) – (d), EU LI1 – EU LI3

This quantitative information is disclosed in tabular form in the document "Offenlegung_Verbund_2024-12-31.xlsx".

4.3 Risk from equity exposures not included in the trading book

CRR Art 436 (e)

This item includes subsidiaries and participations established or acquired for strategic reasons. Strategic participations are companies that cover the areas of business of the Association, as well as companies that support those areas of business. Subsidiaries are fully consolidated if they are material for the presentation of a true and fair view of the net assets, financial position and results of operations of the Association.

Companies on which a material influence is exerted are measured according to the equity method. All other participations are reported at fair value, except if their acquisition costs are less than euro 50 thousand or if the related equity share does not exceed the carrying amount by more than euro 100 thousand. As these participations are not listed at a stock exchange and no market prices are available on an active market, the participations are measured by means of valuation methods and input factors some of which are not observable. Valuations are effected according to the discounted cash flow method and the peer group approach. Various calculation models are applied. The income approach is used if companies included in the annual financial statements of the Association of Volksbanks exercise control over the company or hold any management function, and budgets are available accordingly. If the company is not controlled, the fair value calculation is performed on the basis of the dividend paid as well as the annual results of the last five years. In case of companies whose object does not permit any regular income or the result of which is controlled by the parent company through settlements, the net assets are used as valuation criterion. In case of participations in cooperatives, the share capital is used as the fair value, provided the subscription of new shares and the cancellation of existing shares are possible at any time. If valuation reports for participations are prepared by external valuers, they will be used for current valuation.

To the extent that the discounted cash flow method is applied, the discount rates used are based on the respective current recommendations of the Fachsenat der österreichischen Kammer der Wirtschaftstreuhänder as well as of international financial data service providers and range between 8.5 – 12.7 % in the 2024 financial year (2023: 8.9 – 13.2 %). The market risk premium used for the calculation is 7.0 % (2023: 7.8 %), the beta values used range between 0.9 – 1.5 (2023: 0.9 – 1.4). Additional country risks did not have to be considered. Discounts due to fungibility and exercise of control in the amount of 10 % in each case are effected for two participations.

Changes in value are reflected in the fair value reserve. If the reason for an impairment loss ceases to exist, the reversal of impairment is made without any effect on profit or loss directly in equity in other comprehensive income, taking into account any deferred taxes.

For calculating fair value sensitivities, the interest rate is basically set at +/- 0.5 percentage points. The income components used for the calculation are taken into account at +/-10 % for the sensitivity calculation in each case. In case of participations where the fair value corresponds to net assets, this is taken into account at +/- 10 % for information regarding sensitivity. For fair values derived from valuation reports, a lower and an upper band for sensitivity are recognised, respectively. If the fair value corresponds to the share capital, no sensitivity will be calculated.

Shares and participations

| Euro thousand | 31 Dec 2024 | 31 Dec 2023 |
|---|--------------------|--------------------|
| Shares in unconsolidated affiliates | 11,633 | 14,464 |
| Investments in companies with participating interests | 8,934 | 8,147 |
| Other participations | 95,329 | 141,222 |
| Participations | 115,896 | 163,833 |

A list of unconsolidated affiliates is shown in Note 54).

In the financial year, participations with a carrying amount of euro 79,032 thousand were sold (2023: euro 1,047 thousand). The most significant participations in the item Other participations are Volksbanken Holding eGen with a carrying amount of euro 68,540 thousand (2023: euro 117,707 thousand), PSA Payment Services Austria GmbH with a carrying amount of euro 5,305 thousand (2023: euro 4,033 thousand) and Schulze-Delitzsch Ärzte und Freie Berufe e.Gen. with a carrying amount of euro 4,691 thousand (2023: euro 4,691 thousand). Income from participations is reported in the income statement in the item result from financial instruments and investment properties. Income from participations includes dividends of euro 3,101 thousand from participations measured at fair value through OCI (2023: euro 2,966 thousand).

VBW and the affiliated credit institutions (Volksbanks) cancelled 201,766,539 of its original 266,658,516 shares with a face value of euro 0.02 each in Volksbanken Holding eGen as at 30 November 2023, i.e. shares with a face value of euro 4,035,330.78. Following the expiry of the one-year disbursement block pursuant to Section 79 of the Cooperative Societies Act (GenG), Volksbanken Holding eGen disbursed the business assets totalling euro 77,519,253.74 to VBW and the affiliated credit institutions (Volksbanks) in December 2024, including euro 4,035,330.78 in pro rata nominal capital. The partial cancellation of the shares was carried out for the purposes of reducing the participation in Volksbanken Holding eGen. This cancellation has caused a carrying amount of euro 68,540 thousand to be disposed of.

Sensitivity analysis

VBW holds shares in cooperatives in which the members have no entitlement to the available assets in the event that the shares are cancelled (not in the event of winding up), unless the articles of association stipulate otherwise. Therefore, no sensitivity is calculated for these companies with a carrying amount of euro 9,641 thousand (2023: euro 9,557 thousand), as any change of interest rate will not affect valuation.

Participations valued using the DCF method

Proportional fair value

Euro thousand

| 31 Dec 2024 | | Interest rate | | |
|------------------|----------|---------------|--------|--------|
| | | -0.50 % | ACTUAL | 0.50 % |
| | -10.00 % | 14,727 | 14,244 | 13,820 |
| Income component | ACTUAL | 16,363 | 15,587 | 14,881 |
| | 10.00 % | 18,000 | 17,146 | 16,369 |
| 31 Dec 2023 | | | | |
| | -10.00 % | 13,104 | 12,687 | 12,307 |
| Income component | ACTUAL | 14,112 | 13,649 | 13,227 |
| | 10.00 % | 15,120 | 14,611 | 14,146 |

Participations measured at net assets

Proportional fair value

Euro thousand

| 31 Dec 2024 | Decrease of assumption | ACTUAL | Increase of assumption |
|--------------------------|------------------------|--------|------------------------|
| Net assets (10 % change) | 16,613 | 18,392 | 20,305 |
| 31 Dec 2023 | | | |
| Net assets (10 % change) | 17,564 | 19,515 | 21,468 |

Participations measured based on external appraisals

| Euro thousand | Proportional fair value | | |
|-------------------------|--------------------------------|---------------|-------------------|
| 31 Dec 2024 | Lower band | ACTUAL | Upper band |
| Proportional fair value | 64,758 | 71,953 | 79,148 |
| 31 Dec 2023 | | | |
| Proportional fair value | 108,731 | 120,809 | 132,893 |

5 Own funds

5.1 Adjustment of own funds, deductions and adjustment items, and limitation on application

CRR Art 437 (a), (d), (e), EU CC1, EU CC2

This quantitative information is disclosed in tabular form in the document "Offenlegung_Verbund_2024-12-31.xlsx".

5.2 Main features and conditions of Common Equity Tier 1, additional Tier 1 and supplementary capital instruments

CRR Art 437 (b) and (c), EU CCA

This quantitative information is disclosed in tabular form in the document "Offenlegung_Verbund_2024-12-31.xlsx".

5.3 Consideration of own funds components determined on a different basis

CRR Art 437 (f)

The relevant regulation is not applicable to the Association of Volksbanks as at 31 December 2024.

6 Own funds requirements

6.1 Approach used to assess the adequacy of internal capital

CRR Art 438 (a) and (b), EU OVC

The implementation of regulatory requirements in the Association of Volksbanks is as follows:

Pillar 1: Minimum capital requirements

Within the scope of Pillar 1, compliance with the minimum regulatory requirements is ensured. With respect to both credit risk and market risk, and also for operational risk, the respective regulatory standard approaches for determining the minimum capital requirements apply.

Pillar 2: Internal Capital & Liquidity Adequacy Assessment

By way of the Internal Capital & Liquidity Adequacy Assessment process, the Association of Volksbanks takes all measures required to ensure that all risks arising from current and planned business activities of the Association of Volksbanks are counterbalanced by an adequate liquidity and capital base at all times. The detailed design of the Internal Capital & Liquidity Adequacy Assessment process depends on the regulatory requirements and supervisory expectations of the ECB as well as on internal guidelines.

Pillar 3: Disclosure

The requirements of Pillar 3 are met by publishing the qualitative and quantitative disclosure rules pursuant to Regulation (EU) no. 575/2013 (CRR) and Directive 2013/36/EU (CRD IV), as well as the applicable Regulation (EU) no. 2019/876 (CRR II) and Directive no. 2019/878 (CRD V) on the bank's own website under www.volksbank.at/volksbanken-verbund/verbund-offenlegung.

The ICAAP implemented is based on the business strategy, strategic planning, risk profile and risk strategy of the Association of Volksbanks. The individual elements of the cycle are performed at varying intervals (e.g. daily for market risk / trading book risk measurement, quarterly for preparing the risk-bearing capacity calculation, annually for the risk inventory and the determination of the risk strategy). All the activities described within the cycle are reviewed for up-to-dateness and adequacy at least annually, and adjusted to the respective current environment if necessary; they are approved by the Managing Board of the CO.

By identifying the main risks in the risk inventory, by quantifying and aggregating risks, by determining the risk-bearing capacity, by setting limits and carrying out stress tests, it is possible to demonstrate that the risks assumed are sufficiently covered by adequate internal capital at all times, and to ensure such cover also in future. Thus, all measures are taken to meet the regulatory requirements for comprehensive risk management.

The respective risk management procedures are up to date and are continuously improved and developed. They are appropriate to the risk profile and strategy of the Association of Volksbanks.

As part of the annual SREP (Supervisory Review and Evaluation Process), the Managing Board of VBW submits the "Capital Adequacy Statement" (CAS) to the supervisory authority, which contains statements on the capital adequacy of the Association of Volksbanks. In the Capital Adequacy Statement, the capital resources of the Association of Volksbanks are assessed as adequate and the risk management as solid and robust. The adequacy of capital resources is determined in particular by the level of the CET1 capital ratio. The CET1 capital ratio of the Association of Volksbanks as at 31

December 2024 was 15.46 %. The total capital ratio as at 31 December 2024 was 22.92 %. After full application of all regulatory requirements, the CET1 capital ratio as at 31 December 2024 is 15.38 % and the total capital ratio is 22.85 %.

The Association of Volksbanks again submitted to the annual SREP (Supervisory Review and Evaluation Process) within the scope of the Single Supervisory Mechanism (SSM) of the ECB. This resulted in a Pillar 2 Requirement (P2R) of 2.25 % at the consolidated level as at 31 December 2024 (2023: 2.50 %).

Moreover, the result of the Supervisory Review and Evaluation Process (SREP) also took account of the SSM stress test of the ECB that was carried out in 2023, with a Pillar 2 Guidance (P2G) of 1.25 %. The Pillar 2 Guidance must be met entirely with Common Equity Tier 1 (CET1) and has no impact on the maximum distributable amount (MDA).

Based on the SREP decision of November 2023 and taking into account the composition of the additional own funds requirement (P2R), the capital requirements and capital recommendations for the Association of Volksbanks as at 31 December 2024 are as shown in the table. Any shortfall in AT1/Tier 2 will increase the CET1 requirement accordingly.

Minimum capital requirements and capital buffers

| | 31 Dec 2024 | 31 Dec 2023 |
|--|----------------|----------------|
| Pillar 1 | | |
| CET1 minimum requirement | 4.50 % | 4.50 % |
| Tier1 minimum requirement | 6.00 % | 6.00 % |
| Total minimum requirement for own funds | 8.00 % | 8.00 % |
| Combined buffer requirement (CBR) | 3.95 % | 3.79 % |
| Capital conservation buffer (CCB) | 2.50 % | 2.50 % |
| Systemic risk buffer (SRB) | 0.50 % | 0.50 % |
| O-SII buffer (O-SIIB) | 0.90 % | 0.75 % |
| Countercyclical capital buffer (CCyB) | 0.05 % | 0.04 % |
| Pillar 2 | 2.25 % | 2.50 % |
| CET1 minimum requirement | 1.27 % | 1.41 % |
| Tier1 minimum requirement | 1.69 % | 1.88 % |
| Total minimum requirement for own funds | 2.25 % | 2.50 % |
| Total CET1 requirement | 9.72 % | 9.70 % |
| Total Tier1 requirement | 11.64 % | 11.67 % |
| Total capital requirement | 14.20 % | 14.29 % |
| Pillar 2 Guidance | 1.25 % | 1.25 % |
| CET1 minimum guidance | 10.97 % | 10.95 % |
| Tier1 minimum guidance | 12.89 % | 12.92 % |
| Total own funds guidance | 15.45 % | 15.54 % |

During the 2024 financial year, the Association of Volksbanks complied with the minimum capital requirements and/or capital guidances resulting from the SREP.

The result of the 2024 Supervisory Review and Evaluation Process (SREP) was forwarded to VBW as the central organisation of the Association of Volksbanks in the official SREP decision from December 2024. The SREP requirement (P2R) remains unchanged at 2.25 % in 2025. The SREP guidance (P2G) remains unchanged at 1.25 % compared to the reporting year. The buffer for systemically important institutions (O-SIIB) at consolidated level will decrease from 0.90 % to 0.45 % in 2025. As at 31 December 2024, 77.2 % of available covering potentials in the economic perspective were utilised.

The capital position was consistently stable in 2024. The rating agency Fitch has confirmed the BBB+ rating of the Association of Volksbanks. The rating outlook is considered stable by Fitch.

6.2 Own funds requirement

CRR Art 438 (d), (e), (h), EU OV1

This quantitative information is disclosed in tabular form in the document "Offenlegung_Verbund_2024-12-31.xlsx".

6.3 Participations of insurance undertakings that were not deducted

CRR Art 438 (f), EU INS1

The relevant regulation is not applicable to the Association of Volksbanks as at 31 December 2024.

6.4 IFRS transitional provisions

The adjustment amount of the IFRS transitional provisions is calculated from the sum of the increase in risk provisions upon first-time application of IFRS 9 and the increases in risk provisions in Stage 1 and Stage 2 between first-time application and 31 December 2019 as well as the increase from 31 December 2019 until the current balance sheet date. In the event of a negative increase, the corresponding summand is limited by 0. Post-model adjustments are included in the respective levels of risk provisions. Deferred taxes are deducted from these totals, and the values calculated in this way are scaled using time-dependent factors specified in the CRR. The adjustment amount thus calculated is added to the Tier 1 capital and, on the other hand, added to total risk exposure in accordance with paragraph 7a multiplied by the adjustment amount with a uniform risk weight.

7 Macprudential supervision

7.1 Countercyclical capital buffer

CRR Art 440, EU CCyB1, CCyB2

This quantitative information is disclosed in tabular form in the document “Offenlegung_Verbund_2024-12-31.xlsx”.

7.2 Indicators of global systemic relevance

CRR Art 441

The Association of Volksbanks is classified as a not globally systemically important group.

8 Information on credit risk and credit risk mitigation

8.1 General qualitative information on credit risks

EU CRB

Definition of “overdue” and “non-performing”

Loans are considered overdue if payments on interest and/or principal have been outstanding for at least one day or if the committed credit limits have been exceeded for at least one day. All loans classified in credit rating class 5 are considered to be defaulted (non-performing).

Methods for determining specific and general credit risk adjustments

CRR Art 442 b)

Impairment loss is calculated and recognised for the following financial instruments:

- For financial assets at amortised cost (AC), lease receivables in accordance with IAS 17 and active contract items in accordance with IFRS 15, the impairment loss is recognised by way of a risk provision.
- In case of purchased or originated credit-impaired financial assets (POCI), the impairment loss is taken into account in the credit risk-adjusted effective interest rate¹. If the amount of estimated loss has changed since the time of addition, this is reported as a risk provision.
- Impairments of irrevocable loan commitments and financial guarantees are reported as provisions in liabilities.
- For debt instruments classified as fair value through other comprehensive income (FVTOCI) in accordance with IFRS 9, the impairment loss is recognised through other comprehensive income (OCI).

The impairment loss does not have to be calculated and reported separately for the following financial instruments:

- The impairment rules do not apply to financial instruments carried at fair value through profit or loss (FVTPL; “Financial at Fair Value through Profit and Loss”), as the fair value already takes impairment into account.
- As equity instruments must always be accounted for at fair value under IFRS 9, the impairment rules generally do not apply to them.

Under IFRS 9, the amount of the impairment loss is determined by a dual approach, which results in an impairment of either the 12-month expected credit loss or the lifetime expected credit loss. The loss estimates differ primarily in terms of the time horizon for which the probability of default is considered.

12-month expected credit loss (Stage 1) if:

- the credit risk has not increased significantly since addition, or
- the credit risk of the financial instrument is low on the reporting date (low credit risk exemption)

¹ Within the Association, POCI is defined as all financial instruments that were already included in rating class 5 at the time of addition.

Lifetime expected credit loss (Stage 2 and 3) if:

- the credit risk has increased significantly since addition, or
- the financial instrument is “credit impaired” at the reporting date, or
- the financial instrument was “credit impaired” at the time of acquisition (Purchased/Originated Credit Impaired Assets)

The impairment loss or risk provision is subsequently determined either at individual transaction level or at portfolio level. To determine the impairment loss at individual transaction level, the expected cash flows are compared with the contractual cash flows of the respective transactions (ECF method). When determining the impairment loss at portfolio level, the calculation is also carried out individually for each transaction, but the parameters used for this purpose (PD, LGD, transfer thresholds) are derived from portfolios/groups with the same risk characteristics.

Portfolio loan loss provision: For positions classified in Stage 1 or Stage 2, the calculation of the expected loss is generally performed at portfolio level (portfolio analysis in Stage 1 and Stage 2).

For loan exposures in rating class 5 (Stage 3), the impairment is determined on the basis of the significance of the customer of the Association:

- Individual analysis in Stage 3: Exposure amount of the customer of the Association at least euro 750 thousand
- Portfolio analysis in Stage 3: Exposure amount of the customer of the Association less than euro 750 thousand

If unexpected (redemption) payments are received, the risk provision in the balance sheet will be reduced accordingly.

Changes in the estimate of the amount or timing of the expected cash flows (e.g. by accepting additional collaterals) lead to a recalculation of the impairment; the original effective interest rate continues to be decisive for discounting. The impairment is adjusted to the recalculated requirement through profit or loss. If the reason for the impairment lapses, the impairment is reversed in full through profit or loss. The upper limit is the notional amortised cost of the receivable as it would have been without any impairment at the current reporting date.

Forward-looking information

The Association of Volksbanks takes account of forward-looking information in determining impairment loss. The forward-looking information includes both macroeconomic projections and existing information at sub-portfolio or individual customer level.

The ECB's macroeconomic projections are used as an anchor for determining the real economic scenarios. Based on internal analyses and taking into account additional market data, several scenarios are defined. The prognostic process comprises both the forecast of the development of the relevant variables in real economic terms over the course of the next three years and the estimate of probability (weighting) for each scenario. In weighting the macroeconomic scenarios, the risk situation and the composition of the portfolio of the Association are taken into account in particular.

The process of formation of an impairment loss for the annual financial statements provides for a comprehensive evaluation of the up-to-dateness of available forecasts. New risks that have not been fully mapped in the available data, or possible macroeconomic developments that are not fully reflected in the models, scenarios and assumptions are recorded as post-model adjustments.

For the evaluation of the up-to-dateness of the underlying data, account was taken of the fact that, for the rating model used for companies preparing a balance sheet, recalibration was in progress at year-end 2024, but was not yet in use as

at the balance sheet date (31 December 2024). The effects of this future rating calibration were mapped in the 2024 annual financial statements as post-model adjustments.

With respect to new types of risk drivers that are not fully reflected in the models, scenarios and assumptions, a systematic analysis was performed as at 31 December 2024. The analysis included, in particular, risk identification, delimitation, materiality and degree of coverage of the new risk drivers in relation to individual sub-portfolios and covered the following risk categories:

- Geopolitical risks
- Climate and environmental risks
- Energy costs, prices of raw materials and supply chain risks
- Inflation risks and risks of increasing interest rates
- Macroeconomic uncertainties

Material new risks not fully reflected in the models, scenarios and assumptions were quantified using simulations of rating downgrades and/or by readjusting the stage transfer rules, and then recognised as post-model adjustments. As at 31 December 2024, post-model adjustments were effected in the following sub-portfolios:

- Corporate customers highly dependent on gas and energy prices
- Customers in the real estate and construction sectors with below-average ratings

Foreign currency loans and loans with repayment vehicles

FMA-FXTT-MS

The following indicators were used and reviewed within the Association of Volksbanks in accordance with margin no. 50 of the FMA Minimum Standards for the Risk Management and Granting of Foreign Currency Loans and Loans with Repayment Vehicles:

- The foreign currency loan volume to borrowers not hedged as defined in margin no. 14 represents at least 10 % of an institution's total loan portfolio (total loan portfolio means total lending to non-banks pursuant to Section 2 no. 22 of the Austrian Banking Act excluding the government sector), or
- significant legal or operational risks are to be expected due to foreign currency and repayment vehicle loans, or
- the expected funding gap for repayment vehicle loans of the institution at aggregate level is at least 20 %.

The review of the indicators has shown that items a. and b. were not fulfilled as at 31 December 2024 and that no disclosure is required as a result; however, item c. is fulfilled, and therefore a disclosure of loans with repayment vehicles is made pursuant to margin no. 51 of the FMA Minimum Standards for the Risk Management and Granting of Foreign Currency Loans and Loans with Repayment Vehicles:

| 31 December 2024 | | | | |
|-------------------|---|-------------------------------------|--------------|---|
| Volume (EUR ths.) | Total exposure* repayment vehicle loans | Repayment vehicle gap cumulative | Gap in % | Share of repayment vehicle loans in total portfolio |
| Total | 345,981.02 | 94,481.76 | 27.3% | 1.3% |
| of which CHF | 248,735.90 | 81,175.18 | 32.6% | 0.9% |
| of which EUR | 94,912.56 | 12,813.49 | 13.5% | 0.3% |
| of which JPY | 2,251.84 | 429.76 | 19.1% | 0.0% |
| of which USD | 80.71 | 63.34 | 78.5% | 0.0% |
| other | - | - | 0.0% | 0.0% |

* Total exposure based on internal risk view: only customer loans, customer risks and customer contingent liabilities are included, internal transactions are excluded.

The projection of the repayment vehicles is made on the basis of the current redemption value, the periodic payments, the assumed return, the index adjustment (only for life insurance policies), and the residual duration. The calculated final value(s) or benefit(s) at maturity is/are compared to the loan(s) at customer level, resulting in a gap or surplus cover.

The parameters used (assumed interest rate and index development) are determined uniformly throughout the Association and revised annually in Q3. As of January 2024, the following annual net yields were used: traditional life insurance 1.52 %; unit-linked life insurance 1.24 %; non-linked repayment vehicles 0.97 %; and index adjustment for relevant life insurance policies 2.30 %.

8.2 Quantitative information on credit risks

CRR Art 442 c) – g)

The quantitative information presented in this chapter is based on the definitions and measures applicable to regulatory reporting under the CRR and the regulatory scope of consolidation of the Association of Volksbanks and may therefore differ from financial reporting under IFRS.

This quantitative information is disclosed in tabular form in the document “Offenlegung_Verbund_2024-12-31.xlsx”.

| Contents | Reference | Template |
|---|----------------|----------------|
| Disclosure on amount and credit quality of exposures including risk provisions, impairments and collateralisation | CRR Art 442 c) | EU CQ1, EU CR1 |
| Maturity structure of overdue exposures | CRR Art 442 d) | EU CQ3 |
| Collaterals obtained by means of seizure and realisation | CRR 442 c) | EU CQ7 |
| Presentation of exposures by geographical distribution, economic sectors and type of receivables | CRR 442 e) | EU CQ5 |
| Changes in the portfolio of defaulted on-balance-sheet and off-balance sheet exposures | CRR 442 f) | EU CR2 |
| Breakdown of loans and bonds by residual duration | CRR 442 g) | EU CR1-A |

8.3 Information on credit risk mitigation

CRR Art 453 a) to e), EU CRC

Rules and procedures for on-balance-sheet and off-balance sheet netting

Netting refers to the offsetting (of a total) of receivables and liabilities of the bank to a specific counterparty (borrower) to form a net receivable/net liability.

On-balance-sheet netting:

Under the CRR, on-balance-sheet netting is the netting of reciprocal receivables (loans and deposits) between the bank and a counterparty (borrower), which are subject to a netting agreement, to form a "net receivable" or net liability.

The net receivable remaining after netting is used to determine the minimum own funds requirement. Any mismatches in terms of currency and maturity between receivables and liabilities are accounted for by applying haircuts.

Qualitative requirements for on-balance-sheet netting under the CRR:

The credit institution must have a sound legal basis for netting that is legally enforceable under applicable law even in the event of the customer's insolvency.

The credit institution must be able at all times to determine the exposures and liabilities covered by the netting agreement.

The credit institution must monitor and manage the risks associated with the termination of collateralisation.

The credit institution must monitor and manage the exposures concerned on a net basis.

Netting is only permitted for reciprocal cash receivables in the same currency between the credit institution and the counterparty (loans and deposits); cross-group netting on both the customer and the bank side is not admissible.

Exposures that may be subject to netting:

In accordance with the CRR, netting of receivables is only recognised as permissible to the extent that the exposures or liabilities subject to a netting agreement:

- are not subject to any restriction on disposal or earmarking that would prevent offsetting at any time
- are legally valid and enforceable in all relevant jurisdictions, even in the event of the borrower's insolvency
- are denominated in the same currency.

This requirement is met by sight deposits and current account facilities without a period of notice or by reciprocal exposures and liabilities relating to current accounts (debit and credit balances).

Where the bank and the borrower are not subject to the same jurisdiction, the above conditions must be met in each of the jurisdictions concerned.

Only the netting of existing balances is permissible, but not the offsetting of any credit lines granted.

If it is not possible to offset exposures and liabilities (mutual cash balances) at any time and in particular directly in the event of the borrower's insolvency, any netting of the related transactions is not permitted. In such a case, corresponding

deposits with the credit institution could be taken into account as financial collaterals (cash collaterals) when determining the minimum own funds requirement, provided the other requirements are met.

Within the Association of Volksbanks, therefore, netting within the meaning of the CRR is generally limited to the mutual offsetting of exposures and liabilities without earmarking and restrictions on disposal in the interbank and commercial lending business.

Market and credit risk concentrations within credit risk mitigation

A major concentration in terms of credit risk mitigation exists in the mortgage collateralisation of Austrian residential real estate. There are no significant concentrations in foreign currencies and individual addresses.

Use of ECAI

CRR Art 444 (a) to (d), EU CRD

(lit a)

The Association of Volksbanks has appointed the rating agencies Standard & Poor's and Moody's irrespective of the class of exposures.

(lit b)

The credit ratings of the designated rating agencies Standard & Poor's and Moody's are not restricted to any classes of exposures.

(lit c)

The Association of Volksbanks applies external ratings in accordance with Article 139 CRR.

(lit d)

The Association of Volksbanks adheres to the standard classification published by the EBA.

8.4 Quantitative information on credit risk mitigation

CRR Art 453 f) to i) and Art 444 e)

This quantitative information is disclosed in tabular form in the document “Offenlegung_Verbund_2024-12-31.xlsx”.

| Contents | Reference | Template |
|--|----------------------|----------|
| Overview credit risk mitigation | CRR Art 453 f) | EU CR3 |
| Credit risk mitigation by exposure class under the standardised approach | CRR Art 453 g) to i) | EU CR4 |
| Credit risk mitigation by credit rating | CRR 444 e) | EU CR5 |

9 Counterparty credit risk

This quantitative information is disclosed in tabular form in the document “Offenlegung_Verbund_2024-12-31.xlsx”.

| Contents | Reference | Template |
|---|-----------|----------|
| Exposures by approach | 439 f,g | EU CCR1 |
| Exposures subject to capital requirements for credit risk-related valuation adjustments | 439 h | EU CCR2 |
| Exposures by exposure classes and risk weighting | 439 l | EU CCR3 |
| Composition of collaterals | 439 e | EU CCR5 |
| Exposures to CCPs | 439 i | EU CCR8 |
| Credit derivative exposures (not relevant within the Association of Volksbanks) | 439 j | |
| α -estimate (not relevant within the Association of Volksbanks) | 439 k | |

10 Market risk

CRR Art 445, EU MR1

Own funds requirements for market risk under the standardised approach

This quantitative information is disclosed in tabular form in the document “Offenlegung_Verbund_2024-12-31.xlsx”.

11 Risk from securitisation positions

CRR Art 449

The Association of Volksbanks has no exposures from securitisation positions.

12 Unencumbered assets

12.1 Quantitative information

CRR Art 443, EU AE1, EU AE2, EU AE3

This quantitative information is disclosed in tabular form in the document "Offenlegung_Verbund_2024-12-31.xlsx".

12.2 Qualitative information

CRR Art 443, EU AE4

The values in Charts A/B/C were calculated in accordance with the guidelines published by the EBA. The values calculated show the median of 4 reporting dates for asset encumbrance.

In the period under review, no longer-term repo transactions within the meaning of Delegated Regulation 2015/61 Article 8(4) are allotted to the encumbered assets reported in line 040 of Chart A. As in the previous period, short-term repo transactions (maturities of up to 2 months) were concluded with securities eligible for central bank borrowing in the past financial year. As at the reporting date, approximately euro 288 million in debt instruments eligible as HQLA were designated for short-term repo transactions. No securities eligible for the cover fund were allocated to the underlying stock for covered bonds, as of 8 July 2022 [under the] Austrian Mortgage Bank Act. As at the reporting date, approximately euro 1 million, and in the period under review approximately euro 1.50 million (median), were designated for the liquidity buffer under Section 21 Austrian Mortgage Bank Act.

Within the Association of Volksbanks, approximately 97 % of the reported values of the securities shown in Chart A are encumbered to cover deposits subject to collateralisation. The reduction of approximately 3 % in the median proportion of deposits subject to collateralisation within encumbered securities refers to the liquidity buffer (Section 21 Austrian Mortgage Bank Act). At the reporting date, the share of encumbered assets in the segment of HQLA-eligible debt instruments increased to approximately 7 % and is based on the above-stated repo transactions.

VB Wien AG, as the central organisation of the Association, provides a share of approximately 30 % of the encumbered debt instruments eligible as HQLA. For details on HQLA development and the LCR, please refer to the Liquidity Risk section of the report. The values shown in the quantitative information on the LCR are the market values of the assets less the corresponding haircuts for the respective asset classes. The median values shown as (E)HQLA in Chart A are determined from an accounting perspective, which is why a derivation is not possible due to the different valuation methods. The same scopes of consolidation are applied in both disclosure reports.

Cash collaterals (including initial margin) for the hedging of fair values for foreign currency refinancing and interest rate derivatives (for the hedging of issues and long-term lending business), as well as promotional loans, account for approximately 2.1 % of the volume of encumbered assets in the item Other assets (line 120 Chart A). Compared to the previous period, the volume decreased by approximately 8 % on average. The change is essentially due to interest rate hedging and the associated fair value changes of the interest rate derivatives. The central organisation's share of these sources of stress within the Association is 100 %.

The requirements for hedging fair value fluctuations for foreign currency refinancing have decreased compared to the previous period due to the further reduction of foreign currency loans.

No currency is classified as a significant currency within the meaning of Article 415 of the CRR. The Swiss franc (CHF) constitutes the major part of the requirement for FX refinancing, which is primarily effected via cross currency and FX swaps.

As regards the unencumbered assets shown in Chart A, credit balances with central banks and balances with clearing partners account for around 15 % of the volume. These assets are used to service operations and payment transactions as well as to hold minimum reserves and secure liquidity. Physical assets are unsuitable to be encumbered during "business as usual", because of the fluctuations in volume. The increase as at the reporting date in the amount of approximately 15 % is due, among others, to the growth in primary funds and the successful issuing activity.

Of the other unencumbered assets shown in Chart A, line 120, approximately 61 % are mortgage backed loans, of which approximately 48 % qualify directly for the underlying stock based on internal criteria.

VOLKSBANK WIEN AG, as the central organisation of the association of credit institutions, is an issuer of covered bonds within the meaning of the Austrian Mortgage Bank Act. Covered bonds within the meaning of the act governing covered bonds (FBSchVG) still exist. The underlying stock entirely consists of mortgage-backed loans of the association of credit institutions, including of VOLKSBANK WIEN AG.

In the reporting period, 2 covered bonds, total face value euro 138 million, within the meaning of the Austrian Mortgage Bank Act were issued and 1 bond under the FBSchVG was redeemed. The surplus cover of the underlying stock has increased due to the higher redemption amount. The quality of the cover fund was maintained during the period under review. The surplus cover of statutory requirements amounted to approximately 59 % with cover assets of approximately euro 5.097 billion as at the reporting date.

Of the covered bonds outstanding on the reporting date with a face value of euro 3.148 billion, euro 3.019 billion have an Aaa rating from Moody's. The share of covered bonds placed was approximately 73 % of the total issue volume on the reporting date. The remaining portfolio is deposited with the central bank as liquidity covering potential.

In the case of the selected liabilities in Chart C, apart from derivatives positions, around 76 % of the volume are attributable to covered bonds placed on the market. A share of approximately 7 % of the liabilities relates to deposits subject to collateralisation, e.g. charge money, trustee deposits or liabilities to central banks. The median of the volume of deposits subject to collateralisation changed by some 40 % year-on-year. As at the reporting date, the volume decreased by approximately 18 % year-on-year. The reduction on the reporting date is due, among others, to the reduction of the TLTRO III volume, which was repaid in full.

13 Debt

13.1 Quantitative information

CRR Art 451, EU LR1 (LR Sum), EU LR2 (LR Com), EU LR3 (LR Spl)

This quantitative information is disclosed in tabular form in the document “Offenlegung_Verbund_2024-12-31.xlsx”.

13.2 Qualitative information

CRR Art 451 d) and e)

Procedures for monitoring the risk of excessive indebtedness

The leverage ratio is a simple, transparent and non-risk-based ratio. The Tier 1 capital (T1 capital) is compared with the (unweighted) on- and off-balance sheet asset items. The leverage ratio requirements are intended to limit the excessive build-up of debt in the banking system. Thus, it is taken into account in internal risk management and assessed as part of the supervisory review process.

The ratios contained in the Risk Appetite Statement (RAS) represent the most important guidelines for the operational implementation of the strategic objectives defined in the business strategy of the Association. The leverage ratio is part of the RAS set of indicators. Target, limit and trigger values have currently been set at the level of the Association.

In the EU, the leverage ratio is a binding minimum requirement from June 2021 as a result of applicable CRR II provisions.

Current reporting

The leverage ratio is reported to the Managing Board of the CO as part of the aggregate bank risk report. The leverage ratio is updated quarterly.

Procedures for responding to changes in the leverage ratio

A limit/trigger violation will be reported directly to the Managing Board of the CO within the framework of the Risk Committee. The Managing Board of the CO will define appropriate measures as required and monitor their implementation on an ongoing basis.

Introduction of measures

If the relevant figure falls below the limit, a plan will be worked out to return to the green zone. Measures to strengthen capital include, for example, an increase in subscribed capital by third parties or the use of hidden reserves. Reductions in lending and the sale of assets, for example, may be used to optimise the balance sheet structure.

Factors that had an impact on the leverage ratio during the reporting period

As at 31 December 2024, the **leverage ratio** of the Association of Volksbanks has decreased by 0.81 percentage points to 7.31 % compared to 2023.

The change in **Tier 1** from euro 2.55 billion to euro 2.41 billion is mainly due to the call of the AT1 issue of euro 220 million in April 2024, following approval by the supervisory authority, and hence to the reduction of the AT1. This compares to an increase in CET1, which is due, in particular, to the profit generated in 2024.

The increase of the **assessment basis** by euro 1.5 billion is due to the new issue of two Tier 2 bonds in March and September 2024 (euro 0.5 billion each), and the partial repurchase of the Tier 2 bond from 2017 (euro -0.2 billion), as well as to the growth in customer deposits by some euro 1.1 billion. This is contrasted by the repayment (euro -0.6 billion) of refinancing within the scope of the TLTRO III programme of the ECB.

14 Liquidity requirements

14.1 Quantitative information

CRR Art 451a (2) and (3), EU LIQ1, EU LIQ2

This quantitative information is disclosed in tabular form in the document “Offenlegung_Verbund_2024-12-31.xlsx”.

14.2 Qualitative information

CRR Art 451a (2), EU LIQB

Explanations of the main drivers of LCR results and development of the contribution of inputs to the calculation of the LCR over time

The liquidity buffer (HQLA) is the main driver of the LCR. It is composed of OeNB credit balances and HQLA securities and indicates a comfortable liquidity base as before. The liquidity buffer is higher than at the beginning of the period under review (30 April 2023), which is mainly due to the increase in customer deposits, which has been ongoing since mid-2023, as well as to capital market issues. Liquidity outflows, e.g. the repayment of ECB funding (TLTRO III), have reduced the liquidity buffer.

LCR outflows are mainly caused by the high volume of retail deposits, which, however, receive very low LCR outflow factors of 5 % for the major part. The increase in the volume of deposits since mid-2023 has led to slightly higher LCR outflows with increasing LCR, as the additional deposits with low weightings simultaneously increase the liquidity buffer. Short-term fluctuations in the volume of deposits mainly arise from effects of payment transactions.

The cash inflows assumed in the LCR calculation also arise predominantly from retail business. The weighted inflows are comparatively low, and accordingly have only little influence on the LCR. They amount to 5-6 % of weighted outflows.

Explanations of changes in the LCR over time

In the period under review, the LCR average was initially around 190 % and then increased to approximately 199 %. In the course of 2024, the LCR at the reporting dates varied at a high level between 183 % and 225 %. It was mainly the launch of new issues as well as increasing customer deposits against a background of generally cautious credit growth that have had an LCR-increasing effect since mid-2023.

In terms of customer deposits, moderate outflows were recorded until mid-2023, which need to be seen in the context of the high increase in interest rates and the resulting aggravated competition over customer deposits, the reduction of excess liquidity from the period of the COVID pandemic, as well as high inflation and (energy) costs. This decrease was more than compensated by the end of the reporting period.

In the period under review, three benchmark issues with a volume of euro 500 million each were floated by VBW. Additionally, since the end of 2022, Retail issues with a total volume of some euro 750 million have been placed across the Association. The benchmark issues have markedly strengthened the LCR. The LCR effect of the Retail issues, on the other hand, is low, as the former are mostly liquidity-neutral reallocations of giro/savings deposits to securitised products.

The participation in two TLTRO III transactions of the ECB during the COVID pandemic led to a marked increase of the LCR at the time (2020/2021). Overall, a volume of euro 3.5 billion was raised. This volume was paid back in full with the last tranche of euro 600 million in June 2024. The partial repayment of euro 700 million in December 2023 and the repayment of the remaining euro 600 million in June 2024 have caused the LCR to decrease at the reporting dates, but, due to opposing positive developments in customer deposits and new benchmark issues, have not led to a decrease of the average LCR.

Explanations on the actual concentration of funding sources

The liabilities are strongly characterised by the customer deposit business, a stable and highly diversified source of funding with relatively constant and low LCR outflows. Due to this diversified funding through customer deposits, the Association of Volksbanks is not exposed to any material concentration risk.

In line with the business model, the most important source of funding is small-volume retail deposits (giro and savings, including SME deposits) with an average volume of around euro 16.4 billion, which corresponds to more than 50 % of total assets. Of this amount, around euro 12.3 billion is classified as stable deposits. By their very nature, small-volume customer deposits are highly diversified.

Unsecured deposits from large customers are of comparatively minor importance, with an unweighted LCR of around euro 5 billion. Here, too, no relevant concentrations have arisen. In the Association of Volksbanks, the top 15 depositors account for only around 3-4 % of total assets. Individual depositors are usually less than 1 %. At the end of the calendar year, there are only a few temporary exceptions with a few large customers at VBW for payment transactions or balancing out liquidity peaks, which temporarily increase the LCR.

The Association's dependence on capital market funding (including Tier 2 own funds issues) remains low, at around 15 % of total assets. VBW is the only institution in the Association that has central bank access and can accordingly refinance itself via central bank funds. Since June 2024, following the last TLTRO III partial repayment, the Association of Volksbanks is no longer refinanced through central bank funds.

As the central organisation of the Association, VBW is also responsible for the latter's liquidity management. From the perspective of VBW as an individual institution, therefore, the liquidity reserves to be provided by the individual Volksbanks with a total volume of around euro 2 billion are also relevant in terms of liabilities.

Overarching description of the composition of the institution's liquidity buffer

As at 31 December 2024, around 50 % of the Association's weighted LCR liquidity buffer consist of credit balances with the OeNB and of cash, the remainder being free HQLA securities. These are mainly HQLA Level 1 securities, primarily in the form of government bonds and mortgage bonds, with only a small part (around 5 % of HQLA) being classified as HQLA Level 2.

Derivative exposures and potential collateral requirements

The derivative exposure for which collateral must be provided mainly consists of interest rate swaps and EUR-CHF FX derivatives in the Association of Volksbanks. For this exposure, around euro 40 million net in cash collateral are currently being provided as at 31 December 2024. Potential future collateral requirements, derived from the maximum monthly change in collateral call liabilities over a historical 2-year period, are LCR-relevant. At approximately 2 % of weighted net cash outflows, LCR outflows from derivatives and collateral requirements are less important overall.

Currency mismatch in the LCR

The LCR currency mismatch in the Association of Volksbanks is immaterial. Relevant foreign currency positions exist only in CHF. Other currencies are present in the portfolio, but are of minor importance.

Within the Association of Volksbanks, the loan portfolio in CHF has been steadily maturing for years and currently accounts for around 1 % of total assets. The inflows from this loan portfolio are offset by outflows from FX derivatives that refinance this portfolio. The collateral for the FX derivatives is issued exclusively in euros. The volume of CHF deposits is immaterial. Securities denominated in CHF are not held.

Other positions in the LCR calculation that are not captured in the LCR disclosure reporting form but that the institution considers relevant to its liquidity profile

There are no other positions relevant to the liquidity profile.

15 Key Metrics (incl. MREL)

CRR Art 447 a) – g), 438 b), EU KM1, Art 45i (3) BRRD, EU KM2, EU TLAC1, EU TLAC3

This quantitative information is disclosed in tabular form in the document “Offenlegung_Verbund_2024-12-31.xlsx”.

16 Return on equity

CRD IV Art 90

The return on capital employed for the 2024 financial year is 0.41 % (2023: 1.07 %) and is calculated as the ratio between result after taxes and total assets at the balance sheet date.

The decrease of the annual result is due to higher loan loss provisions (euro -155.5 million) and to the decline in net interest income (euro -58.9 million), mainly caused by the interest rate reductions of the ECB as well as by higher current staff expenses (euro -21.2 million, among others due to collective bargaining agreements), and to higher administrative expenses (euro -31.6 million, mainly due to investments in market development causing higher IT and marketing expenses). This compares to the result from companies measured at equity of euro 38.0 million and higher commission fees (by euro 17.2 million).

For the increase in total assets, please refer to the explanations regarding the leverage ratio.

17 Qualitative information on environmental, social and governance risks (ESG risks)

In this chapter, the subheadings preceded by letters refer to the qualitative information contained in “ANNEX XXXIX – Prudential disclosures on ESG risks (Article 449a CRR)” to the EBA/ITS/2022/01 (Tables 1-3). The relevant context is provided, on the one hand, by the three risk categories of environmental risks, social risks and governance risks and, on the other hand, by the more detailed division per risk category contained in the annex by business strategy and processes, governance and risk management.

17.1 Business strategy and processes

CRR Art 449a in conjunction with Art 435

Qualitative information on environmental risks

Sustainability and regionality have been part of the business model of the Association of Volksbanks for more than 170 years. The Association of Volksbanks operates in line with cooperative principles and has been built up successfully and sustainably over many generations of members. Our cooperative identity and the sustainability values we go by are distinguishing features of the Association of Volksbanks. Our focus is on customers, partners and employees. The principles of the Association of Volksbanks are set down in a Code of Conduct and honoured by all employees within the scope of our corporate activities.

The Association of Volksbanks is a purely Austrian association of credit institutions and operates almost exclusively within its catchment area: the Austrian market. The Association has no foreign major shareholders, but a democratic cooperative decision-making and control structure through managing cooperatives. Austrian special interest groups are the owners of Österreichische Ärzte- und Apothekerbank. The main objective of the cooperatives is the development mission that determines the purpose of any cooperative, industrial and provident society. Right from the beginning, this objective has always been to maintain and strengthen the legal and economic independence of the cooperative facilities, resources and services, instead of profit maximisation. Ever since their formation, the Volksbanks have been representing the values of trust, regionality and customer focus. In the 21st century, these sustainable values are as important as ever. They still are the solid foundation of the customer concept of the Association of Volksbanks.

The company's business strategy is based on a combination of regional customer service know-how directly on location, on the one hand, and on the settlement and control services of a modern association of independent banks, on the other hand. This means that decisions relevant to customers are taken quickly and directly on the spot where the customers are. The independent primary banks are self-reliant in terms of sales management and accordingly able to act quickly and without red tape. The handling of administrative activities as well as control and management in compliance with banking law are mostly performed in centralised units of the Association. This cooperative division of labour enables the primary banks to focus on their marketing activities, while bundling activities that are not directly associated with retail business within centrally organised units. In this way, costs can be reduced, which in turn benefits our customers.

Focussing on Retail, SME and Real Estate business, the Association is geared to provide core banking services: lending, deposits and payment transactions. Other products and services are offered by competent partners. Therefore, cooperation agreements were concluded with reliable product partners. Our product partners also pursue sustainable business policies – which is of essential importance to the Association. Through considerable streamlining of processes and standardisation of the product range, transparency is increased for our customers due to a neat array of products. The core business segments with the highest impact on performance are the retail lending business and the deposit business.

The core of the Association of Volksbanks is its Austrian network of retail branches. The Volksbanks within the Association operate almost exclusively in their catchment area and on the Austrian market (a maximum of 5 % of the customer

exposure is permitted to exist in neighbouring countries). The focus of the Volksbanks is on being the relationship bank for customers in the region. Accordingly, business activities have focussed on Austria in previous years, resulting in streamlined logistics and a comparatively lower burden on the environment than that of a global player. The Association of Volksbanks does not have any foreign participations, but only participations that directly relate to transacting the company's current business.

This business model, in combination with the focus on Austria, reduces the risk of negative effects on human rights and the environment, as well as any associated reputational risk for the Association of Volksbanks (legal framework applicable in Austria).

The Association of Volksbanks prepares, and regularly reviews, an analysis of the business environment with respect to environmental and climate factors. This analysis examines the way how environmental and climate factors influence the Association of Volksbanks through current and future economic and regulatory developments, and identifies the associated risks and rewards.

The most important insights gained from this analysis of the regional business environment are the following:

- The business model of the Association of Volksbanks is fully associated with Austria, and therefore business operations also depend, in particular, on the general and macroeconomic situation of Austria and on the challenges caused by environmental and climate factors.
- In terms of transformation, the initial situation in the Austrian market is generally good, with a strong base of political stability and high economic potential.
- However, at present, Austria's economy is under pressure showing a slight downturn, mainly driven by the energy-intensive manufacturing sector as well as high energy costs, which are due in part to transition-related climate risks.
- Austria has ambitious goals and has already made a lot of progress on its way towards a climate-neutral economy; but a significant gap remains: the existing level of the measures adopted is likely to be insufficient to achieve the defined goals, especially in certain critical sectors.
- The energy sector is progressing well; it has been heading towards electricity generation based on renewable sources right from the start. Increasing the competitiveness of the EU might open up a growth opportunity for European companies in the clean energy sector – and hence an opportunity for Austria.
- In the sphere of environmental health and ecosystem vitality, Austria presents a differentiated picture.

The business environment analysis thoroughly explores the core sectors of the Association of Volksbanks. The Real Estate sector, Construction and associated industries are key sectors for the Association, and sustainability is an important aspect within the Real Estate sector. Environmentally friendly construction methods and energy-efficient buildings are becoming increasingly important. Investments in modern technologies and sustainable materials are required to meet increasing demands. Complying with legal obligations regarding the environment and adapting to new regulatory requirements will be equally decisive for the long-term competitiveness of companies. Against the background of the challenges existing in the properties and housing sector, experts recommend to support sustainable construction methods, to adapt to regulatory requirements and to use innovative technologies in order to ensure competitiveness and to meet increasing demands. Volksbank has developed the "Refurbishment, Renovation and Modernisation" sales approach to support these challenges and to enable the realisation of sustainable projects. Climate change greatly affects the tourism industry in Austria, in particular winter tourism. A prolonged summer period and an increase in periods with comfortable temperatures may have positive effects on tourism at Austrian lakes and in alpine regions. Tourism needs to adapt to new legal frameworks, including more stringent environmental requirements and emission reduction targets. In this context, investments in energy-efficient systems, renewable energies and sustainable infrastructures are required. Hotels and resorts can significantly reduce their energy consumption, and simultaneously their carbon emissions, by using energy-efficient technologies

and practices. The use of renewable energies such as PV systems, wind power or biomass also offers considerable opportunities to sustainably cover the energy requirement of the facilities and to improve the ecological image of the destination. Volksbank is part of this development by providing funding for carbon reducing projects and by supporting sustainable offers in tourism, the adoption of new technologies and the diversification of tourist services to reduce the sector's dependence on seasonal fluctuations. The agriculture and forestry sector is less cyclical, but greatly influenced by commodity prices, agricultural policy and international competition as well as weather events, global warming and the associated pressure to adapt to changing conditions. The dependence on the weather constitutes a significant risk for the agricultural sector. Unforeseeable weather events like droughts, floods or storms can destroy harvests, considerably damaging output. Outdated technologies and price fluctuations are additional challenges. Opportunities exist in precision farming and sustainable cultivation methods. The use of renewable energy sources such as biogas and solar power equally offers great potential. The demand for organic produce is steadily increasing, and consumers increasingly appreciate the option to buy products directly from producers. Strategies to adapt to climate change and the diversification of production are decisive to increase resilience. The following fields of action have been identified for the Association of Volksbanks: putting a sales focus on modernisation and supporting farmers in using sustainable products (e.g. to increase biodiversity). In this context, the Volksbank provides know-how on subsidies and supports with funding the adaptation strategies of the farmers. The manufacturing sector is massively influenced by macroeconomic variables like commodity prices, energy prices and international competition. The sector is cyclical and sensitive to economic fluctuations. Increasing energy prices and the volatility of commodity markets, in particular, constitute considerable challenges. Against the background of climate and environmental risks, digitisation and automation constitute important aspects in manufacturing. Investments in modern technologies and automation solutions are required to remain competitive. Volksbank experts recommend to support investments in modern technologies, in adaptation to regulatory requirements and the use of innovative technologies in order to ensure competitiveness and to meet increasing demands. Volksbank is happy to serve as contact for funding the transformation. In the transport sector, the transport of goods is mainly driven by activities in industry and construction, while the transport of passengers is less cyclical, nevertheless correlating strongly with trade and tourism. A central risk in this sector are strict regulations and environmental requirements, such as the EU Regulation on the reduction of carbon emissions of vehicles and the emission trading system ETS 2. These provide for strict standards requiring substantial investments in environmentally friendly technologies and compliance measures. Companies need to invest in low-emission or zero-emission vehicles to comply with carbon limits, which may increase operating costs. Companies that invest in modern technologies and adapt to new regulatory requirements may increase their competitiveness, opening up new business opportunities. By focussing on these topics, the Association of Volksbanks can effectively support and lead the required transformation, thus ensuring long-term sustainability and competitive advantages on the Austrian market. Therefore, the Association of Volksbanks invests in subsidy and consultancy know-how, putting a great focus on climate and environmental factors and the associated transformation process also in terms of corporate strategy and governance. In this context, the relevant governance processes are predefined at the level of the Association, the bank and the branch. The goals and the resulting governance ratios (sustainable financing, proportion of sustainable securities within the total securities customer portfolio and emission intensity in g CO₂/euro of the total portfolio) are planned down to these regional levels and regularly reported on within the NAKO (Sustainability Committee) of the Association and the local NAKOs.

With respect to the effects of climate and environmental factors on products and portfolios of the Association of Volksbanks, we can see that the distribution of the risk from the geographical regions analysed (Austria and its federal provinces) as well as from the sectors of the economy varies and affects the products and portfolios of the Association of Volksbanks. It is evident that loans and credits granted to real economy sectors are affected by transition risks to a significant extent. Bonds, which mainly refer to the financial and public sectors, are also greatly affected. The portfolios of the Association of Volksbanks, in particular real estate portfolios and lending to small and medium-sized enterprises (SME), are also greatly influenced by climate and environmental factors. Own assets mainly consist of bonds and equity instruments depending on Austria.

Therefore, the Association of Volksbanks has taken extensive steps to integrate sustainability aspects into its core business and to further expand its sustainability management. The material topics forming the basis of the bank's sustainability management were worked out together with stakeholders. The topics were selected considering the ecological and social impact of the sustainability topics identified, as well as their relevance to stakeholders. The identification and impact assessment of sustainability topics are continuously monitored in workshops with employees and the Managing Board members of VOLKSBANK WIEN AG in its capacity as central organisation of the Association of Volksbanks. In 2021, a stakeholder survey was conducted for the first time, not only for VOLKSBANK WIEN AG but also for the entire Association of Volksbanks, followed by a materiality analysis. To prepare for the CSRD (Corporate Sustainability Reporting Directive) and ESRS (European Sustainability Reporting Standards), the materiality analysis was revised completely in 2023. Together with external sustainability experts, all sustainability aspects were assessed in terms of their potential and actual environmental and social impact in accordance with the ESRS. In addition to the inside-out perspective, an assessment of the risks and opportunities (outside-in perspective) and thus a financial analysis was carried out as well. Together with the assessment of sustainability aspects from the stakeholders' perspective, the dual materiality analysis forms the basis for future reporting in accordance with the CSRD, which will be implemented from the 2024 financial year. The Managing Board of VOLKSBANK WIEN AG released the results of the double materiality analysis at the end of 2023, supplementing the same in subsequent months. A sustainability report in accordance with ESRS was prepared for VOLKSBANK WIEN AG in the 2024 business year for the first time. No sustainability report was prepared for the Association of Volksbanks in the 2024 business year, as there is no statutory obligation to do so.

In the spring of 2023, VOLKSBANK WIEN AG, representing the Association of Volksbanks, joined the TCFD to emphasise the importance of sustainability- and climate-related risks and opportunities. A TCFD GAP analysis was performed, involving all relevant specialist departments. Reporting in accordance with the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD) focuses on risks and opportunities arising from the consequences of climate change. Companies should describe these risks and opportunities and how to deal with them in more detail, thereby helping to strengthen the resilience of companies and financial market stability as a whole. In the reports and also in the present document, the missing information on the TCFD was and is continuously supplemented and disclosed.

Sustainability governance

a) General governance of the Association

In line with the governance principles of the Association of Volksbanks, the Managing Board of VOLKSBANK WIEN AG, in its function as central organisation (CO), bears overall responsibility for the Association with regard to the definition of the strategic corporate objectives, the governance framework and the corporate culture. Together with the CO Managing Board, the Supervisory Board of the CO evaluates the strategic objectives, the risk strategy and the internal principles of proper management and monitors their implementation within the Association. This ensures the effective and prudent management of the credit institution. The governance of the Association applies equally to all topics relating to sustainable effects, risks and rewards and their management for the following dimensions: environment, social matters and corporate strategy.

b) Sustainability governance of VOLKSBANK WIEN AG as the central organisation of the Association of Volksbanks

At European level, sustainability has already been regulated with binding effect by numerous regulations. The various regulations and guidelines emphasise the increasing regulatory importance of sustainability. The expectation of the supervisory authority is to integrate the topic of sustainability into all areas of the bank. This requirement, which according to Section 30a of the Austrian Banking Act is the responsibility of VOLKSBANK WIEN AG as the central organisation of the Association, results in the management requirements for the entire Association of Volksbanks as defined by VOLKSBANK WIEN AG.

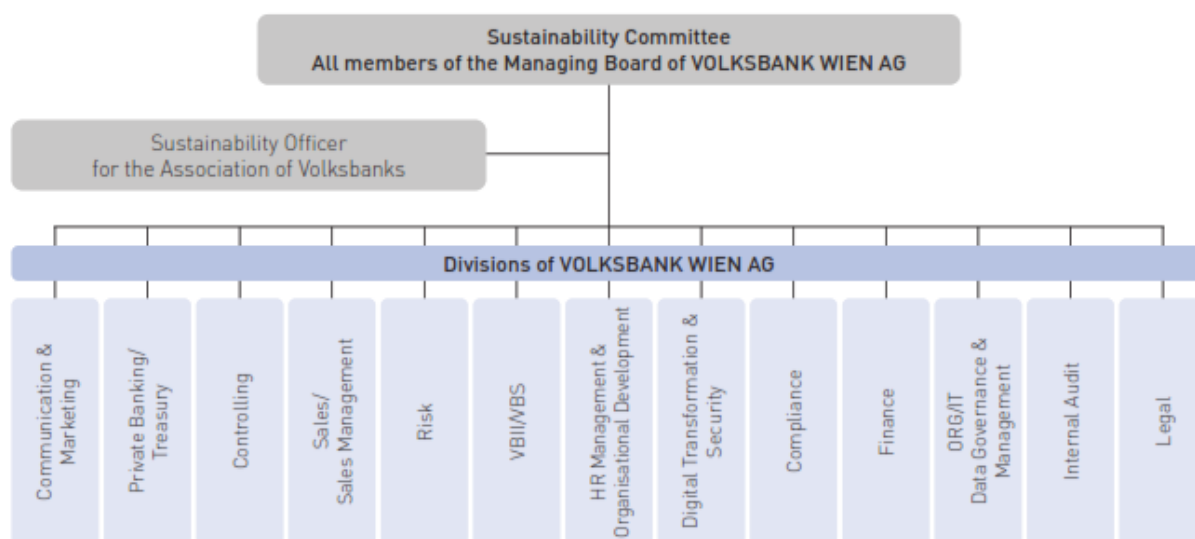
The “Sustainability Project” was launched in 2020 to further expand sustainability management. Following the successful integration of sustainability into all areas of the bank and its core business, this was completed on schedule in mid-2022. In order to accomplish the strategic goals and to ensure the requirements for ESG data, an ESG data project was set up with Risk Control acting as project manager – to continue and expand the topics addressed by the Sustainability Project. This was continued in 2023 and continuously adapted to future regulatory requirements. There are also initiatives regarding ESG databases for SMEs that cover all of Austria (ESG Data Hub).

All divisions of VOLKSBANK WIEN AG (as central organisation) are involved in implementing measures regarding sustainability goals and have each appointed sustainability ambassadors to accompany internal communication on the topic of sustainability and to support the process of achieving their sustainability goals with forward-looking ideas. The Sustainability Report of VOLKSBANK WIEN AG, the first to be prepared in accordance with ESRS, contains all measures and goals implemented in 2024 as well as an outlook on further plans with regard to the key topics of VOLKSBANK WIEN AG. www.volksbankwien.at/nachhaltigkeit

c) Sustainability Committee (NAKO)

A decision-making committee of the entire Managing Board on sustainability was established early in 2022: the Sustainability Committee (NAKO). According to the governance of the Association, this committee corresponds to the other committees within the Association, such as the Risk Committee, Asset Liability Committee, Credit Committee and Cost Committee. The NAKO is the central steering committee for sustainable risks and rewards (ESG risks) in the Association of Volksbanks. Management and control are the responsibility of the CO Managing Board. The NAKO manages the sustainable goals of the Association of Volksbanks (see heading Sustainability goals), adopts resolutions on sustainable effects, risks and rewards, reports on ESG aspects and explains new trends and innovations. Rules of procedure have been defined. Topics from the NAKO are reported to the Supervisory Board on a quarterly basis at each Supervisory Board meeting. Selected division managers serve as members of the Sustainability Committee; all divisions of the bank report to the Sustainability Committee on an ad hoc basis.

The management of and information on ESG aspects of the Association of Volksbanks takes place in the NAKO. Presentation of the composition of the NAKO:



Members of the Sustainability Committee¹⁾

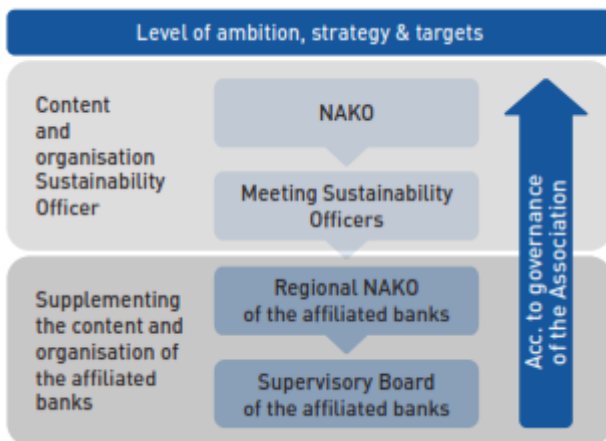
All members of the Managing Board
of VOLKSBANK WIEN AG
Sustainability Officer
DM Communication & Marketing
DM Private Banking/Treasury
DM Controlling
DM Product/Sales Management
DM Risk Control
DM Credit Risk Management, Restructuring & Workout
DM HR Management & Organisational Development
DM Facility Management
DM Compliance
DM Finance

1) DM = division management

d) Sustainability governance of the Association of Volksbanks

The banks of the Association are equally managed based on the sustainability goals and the Key Performance Indicators (KPIs) from the NAKO. Sustainability Officers (SO) have been appointed at the affiliated banks, who serve as multipliers and contribute ideas from the banks. A job description of the function of Sustainability Officer (SO) was prepared. They are responsible for ESG topics in the primary banks and support the managing boards of the primary banks in their efforts to manage the banks based on the sustainability goals. The Sustainability Officers in the Volksbanks regularly report to the supervisory boards of the affiliated banks as well.

The implementation of the sustainability strategy in the Association of Volksbanks and the management of risks and opportunities is taken care of by the Sustainability Committee in the Association.



a) Business strategy of the credit institution with a view to integrating environmental factors and risks, taking account of the impact of environmental factors and risks on the business environment, the business model, the strategy, and the financial planning of the institution

The Association of Volksbanks has established ESG aspects in all areas of the company and has formulated a sustainability strategy applicable across the Association. By defining sustainability principles, the sustainability strategy creates consistent framework conditions for a uniform approach to environmental, social and corporate governance issues. It is part of the business strategy of the Association and describes, among other things, how the Association of Volksbanks integrates ESG criteria into the organisation and the core business, how it takes ESG risks into account and exploits development potentials in connection with sustainability.

In 2021, a sustainability strategy was created for the Association of Volksbanks for the first time, and sustainability was included in all chapters of the strategy of the Association. This strategy defines the fundamental orientation of the Association. VOLKSBANK WIEN AG as the central organisation is responsible for defining the strategic guidelines and managing the Association, while operational implementation is the responsibility of the affiliated banks.

(i) Decarbonisation strategy

In 2023, a decarbonisation strategy for the company's operations was worked out, and the decarbonisation pathway Scope 1 + 2 was calculated using the SBTi methodology.

In 2023, "financed greenhouse gas emissions" (GHG emissions) Scope 3.15., so-called indirect and downstream emissions associated with the lending and investment activities of the Association of Volksbanks, were calculated using an ESG software. The Association of Volksbanks determines financed greenhouse gas emissions on the basis of the PCAF Standard (Partnership for Carbon Accounting Financials). A 2024 decarbonisation strategy with measurable goals was derived therefrom for the Association of Volksbanks. Work is going on continuously on developing the calculation methods and processes to determine GHG emissions.

(ii) Biodiversity and preservation of species in lending

A scoring system was established in the Association of Volksbanks for the assessment of credit risks associated with ESG factors. By assessing soft facts, the account managers evaluate risks of their customers within the scope of an ESG Score. In the sphere of the environment ("E"), these soft facts also include the topics of biodiversity and preservation of species. Moreover, ESG risks are analysed and reassessed as part of the risk inventory using ESG heat maps on a regular basis. In the ESG heat map, various risk events, such as loss of biodiversity and preservation of species, are described and evaluated.

Biodiversity is the basis for life and enables adaptation to changing environmental conditions, such as the climate crisis. Nature provides us humans with food, medication, building materials and helps to improve our well-being, health and the economy. Therefore, the Association of Volksbanks incorporates the topics of loss of biodiversity and preservation of species into its processes.

b) Goals, requirements and upper limits for the short-, medium- and long-term assessment and management of environmental risks, as well as the measurement of performance based on these goals, requirements and upper limits, including the consideration of forward-looking information on shaping the company's business strategy and processes

The sustainability strategy formulates concrete measures and targets as well as ESG KPIs for the Association of Volksbanks in the sphere of the environment, of social affairs and corporate governance. ESG KPIs are classified by short-, medium- and long-term periods (short-term: up to 1y; medium-term: up to 5y, and long-term: up to 2030).

The Managing Board is fully involved in the strategy process and is responsible for approving the sustainability strategy. Opportunity and risk analyses were carried out to develop the sustainability strategy, and the findings were incorporated into the strategy. These analyses included, for example, a materiality analysis, a SWOT analysis, impacts of transition risks, and physical risks regarding the business model in the form of outside-in and inside-out risks. The sustainability strategy is constantly being developed and adapted to the evolving regulatory environment, new findings and innovations, e.g. upon joining the TCFD in 2023.

Since 2022, apart from the existing qualitative goals for the Association of Volksbanks, additional goals have been quantified and included in the planning for the individual areas. Within the Sustainability Committee, steering and control activities are carried out by the Managing Board based on sustainability goals, which also include the monitoring of ESG risks.

Based on the sustainability goals, ten management KPIs have been developed: five environmental KPIs, three social KPIs, and two governance KPIs. For the purpose of measuring the targets, KPIs were adopted that are reported on monthly – if available –, and which apply to the Association and its affiliated banks in each case. The short-, medium- and long-term management of environmental risks was taken into account in defining the management KPIs. For Scope 1 und 2 carbon emissions (in kg CO₂e for operations – climate strategy) targets were already submitted in 2023. A long-term target of 1 kg CO₂e was defined. In the medium term, a target of 1.1 kg CO₂e is meant to be achieved, with a short-term target (2025) of 1.5 kg CO₂e. Moreover, VOLKSBANK WIEN AG is striving to increase the share of sales of sustainable securities. This goal is determined in the KPI concerning the proportion of sustainable securities within the entire securities portfolio. In the long term, the intention is for the sale of sustainable securities to amount to 30 %. Here, the steering effect is in widening the product range. For Scope 3 emissions in g CO₂/euro of the overall portfolio, we are focussing on long-term strategic considerations and on improving the data basis in the short term; see also Chapter 17.3 Risk Management. A target of 32.9 g CO₂/euro in the medium term and of 23.1 g CO₂/euro in the long term is expected to be achieved by reducing intensity in the Business Loans and Mortgages asset classes. The Association of Volksbanks introduced a system for marking sustainable credits in 2024. These sustainable credits correspond to the Taxonomy Regulation and to ICMA (International Capital Market Association) standards. The short-term goal is 15 %, the medium-term goal 18 %, and in the long term (2030) a value of 25 % of sustainable financing is meant to be achieved in new retail business. The social KPIs are geared to the customer relationship, employee satisfaction and diversity. Both short- and long-term goals are being set here, which are included in the definition of a target path. The governance KPIs refer to the structure, the processes and control mechanisms used by the company within its corporate governance. This is another step to integrate sustainability into the organisation. The indicators for measuring sustainability goals represent the current status, which is being continuously developed and updated. The KPIs will be adapted to the requirements of the CSRD and ESRS in future. The 10 ESG sustainability goals of the Association of Volksbanks including KPIs and status of implementation:

| | 10 sustainability goals | KPI | Implementation status |
|---|--|---|-----------------------|
| E | "Low risk" rating from Sustainalytics | Maximum rating of 20 and classification as low risk | Achieved |
| | Taking into account ESG criteria in the credit process | Reduction of emission intensity in g CO ₂ /euro of the overall portfolio | In progress |
| | Increase share of ESG products | Share of sustainable financing in Retail Share of sustainable securities in total securities sales | In progress |
| | Decarbonisation of operations | Greenhouse gas neutrality of operations (Scope 1 + 2) of the Association of Volksbanks until 2030 | In progress |
| | Development of a biodiversity strategy | tbd | Being prepared |
| | Customer and employee satisfaction | Customer Net Promoter Score and Employee Net Promoter Score | In progress |
| | Proportion of women in management positions | Increase the proportion of female managers by 10 % every two years | In progress |

| | | | |
|----------|---|-------------------|----------------|
| S | Cooperative dividend flow | tbd | Being prepared |
| G | Transparency on taxonomy, decarbonisation and governance and introduction of a premium system for ESG | Green Asset Ratio | Achieved |
| | Integration of ESG in the "three lines of defence" | tbd | Being prepared |

Reporting structure: see Chapter 17.2. Corporate governance (i) 2 Reporting structure

The Sustainability Report contains all measures and goals implemented as well as an outlook on further plans with regard to the material topics of the Association of Volksbanks. In 2020, the implementation of the ESG measures defined in the investment strategy was started. The main content is the simultaneous pursuit of an active and a passive strategy.

VOLKSBANK WIEN AG will not enter into business relationships or financing with industry sectors or in business areas that fail to comply with environmental regulations. Moreover, we take care to protect the environment, and the Association of Volksbanks is committed to advance environmentally friendly technologies and projects. For this reason, we will not, for instance, enter into business relationships in the following branches of industry and areas of business: owning or operating nuclear or coal-fired power plants and/or radioactive waste repositories or the mining of uranium, soft and hard coal.

c) Current investment activities and (future) investment requirements with a view to environmental goals and EU taxonomy-compliant activities

VOLKSBANK WIEN AG is the only bank within the Association of Volksbanks that is subject to the NFRD. Implementing the Taxonomy Regulation, VOLKSBANK WIEN AG has reported financing and investment in taxonomy-eligible economic activities as a proportion of total assets from 2022. As of this year, the extent to which VOLKSBANK WIEN AG finances or invests in taxonomy-compliant economic activities must be disclosed.

This is the first time that the share of these exposures in total assets, the so-called Green Asset Ratio (GAR), including applicable reporting forms, is presented in the Sustainability Report. Disclosure was made voluntarily for the report of the Association until the 2023 business year. No report was prepared for the Association for the 2024 business year. The strategic orientation of the bank's portfolio in relation to Taxonomy will be developed in the future.

The business model of VOLKSBANK WIEN AG is to focus on the bank's core business and to enter into cooperations with strong product partners. In the area of investment funds, Union Investment is VOLKSBANK WIEN AG's product partner; it currently has 13 sustainable funds on its list of recommended funds for sale in Austria.

The Association of Volksbanks intends to intensify its activities on the green financial market. For VOLKSBANK WIEN AG as the central organisation of the Association of Volksbanks to be able to issue green, social and sustainability bonds, it has now published its Sustainability Bond Framework. This has created the basis for the Association of Volksbanks to finance ecological and/or socially sustainable investments on the capital market. The Framework was prepared taking account of the Green Bond Principles, the Social Bond Principles and the Sustainability Bond Guidelines of the International Capital Market Association (ICMA). Sustainalytics GmbH has reviewed the Framework of VOLKSBANK WIEN AG and has confirmed compliance with ICMA Principles and Guidelines. VOLKSBANK WIEN AG issued a green bond for the first time in March 2023.

The aim is to continuously develop an ESG portfolio within the banking book. For this purpose, an amount of ESG bonds (which is taken into account in budgeting) is purchased annually. Currently, all green bonds, social bonds and sustainable bonds that are issued within a framework widely recognised in the market are considered to be ESG bonds.

New investments (tangible fixed assets) in the bank's operations were planned starting in 2024, and acquired in a controlled manner. The goal here is to make at least 15 % of investments with ESG aspects in mind.

Taking into account social and governance risks

Being climate risks, physical and transitory risks constitute the biggest block of ESG risks, but social and governance risks are considered as well. As opposed to climate risks, however, it is more difficult to identify these risks, and therefore they are considered in the overall context of the relevant company and/or the political / economic situation of a country.

Building an ESG bond portfolio within the banking book indirectly contributes to reducing these risks.

The following processes are actively applied to avoid such risks:

- Risk analysis within the scope of credit line requests
- Ad hoc evaluation in the event of a new purchase and brief documentation in the checklist

In the event of significant changes to the credit risk due to such risks, a statement will be made during the year within the scope of the rating process.

d) Strategies and processes for the direct and indirect cooperation with new or existing counterparties in relation to their strategies for mitigating and reducing environmental risks

A scoring system was established in the Association of Volksbanks for the assessment of credit risks associated with ESG factors. By assessing soft facts, the account managers evaluate risks of their customers within the scope of an ESG Score. During the relevant assessment, topics such as energy efficiency, air pollution, environmental damage and biodiversity are dealt with.

The assessment of the risks associated with ESG factors is considered within the scope of the credit decision. In this context, transitory and physical environmental risks and onerous or hazardous aspects in relation to the customer's earning power, financial situation and/or business model need to be assessed.

In accordance with the Code of Conduct, attention is paid to the protection of the environment within the scope of lending. Financed transactions must comply with environmental regulations. For this reason, no business is conducted in environmentally harmful sectors.

Moreover, in order to avoid physical and transitory risks, the following processes are applied to investments in the banking book:

- Risk analysis within the scope of credit line requests
- In the event of significant changes to the credit risk due to sustainability risks, a statement will be made during the holding period within the scope of the rating process.
- Ad hoc evaluation in the event of a new purchase, if possible

*See Chapter 17.3. Risk Management, Qualitative information on environmental risks, lit. l) and m).
See also Chapter 17.1. Qualitative information on social risks, lit. c).*

Details of strategies and procedures relating to environmental factors of VOLKSBANK WIEN AG are contained in the Sustainability Report in Chapter ESRS 2 SBM-3.

Qualitative information on social risks

For more than 170 years, the cooperative development mission in the region and the special aspect that customers of the Volksbanks are also owners of the bank have been distinguishing features of the credit cooperatives. Within the Association of Volksbanks, this participation option is partly guaranteed indirectly via the holding cooperatives (“Beteiligungsgenossenschaften”). Cooperatives are sustainable because they think and operate with a long-term perspective, with a mission to benefit their members without being driven by short-term shareholder value. They support the reasonable dimensions and the diversity of regional economic structures (as opposed to monopolies). They are built on proximity and personal contact and usually very deeply rooted in the region and among the people who live there. Hence, they strengthen regional economic cycles – for example, when Volksbank finances local SMEs. Regionality and sustainable action are therefore firmly anchored in Volksbank’s DNA.

The cooperative connects a wide variety of stakeholders in the region. In addition to its role as sponsor and financier, the regional bank is a hub, an enabler and a networker. According to the terminology of the EU Commission and the OECD, “social economy” also includes cooperatives. The ÖGV is therefore explicitly mentioned in the EU Commission’s Country Report as a driver of the social economy (<https://beta.op.europa.eu/en/publication-detail/-/publication/b6f7a49d-67cd-11e9-9f05-01aa75ed71a1/language-en/format-PDF/quote>, page 56).

Sustainability from the cooperative’s perspective:

Ecological sustainability manifests itself, for instance, in energy cooperatives that contribute to the achievement of climate targets, and regional independence from the commercial energy suppliers and uncontrollable electricity price increases.

Social sustainability means the preservation of communal identity and also overcoming poverty (e.g. cooperatives supporting regional building projects, ‘assistance cooperatives’), as well as supporting the target group in the healthcare sector through the professional bank of Austrian physicians and pharmacists.

As regards corporate governance, the special feature here is that customers are simultaneously owners of the cooperative and entitled to regional participation through the cooperative structure.

Economic sustainability means guaranteeing the livelihood of people in the region, providing for the sustainable existence of businesses, and enabling companies to have long-term business relationships.

- a) Modification of the business strategy of the credit institution with a view to integrating social factors and risks, taking account of the impact of social risks on the business environment, business model, strategy, and financial planning

Actively exemplifying the values of VOLKSBANK WIEN AG and the commitment to modern compliance are the mandate of the Managing Board and part of the permanent management mission across all hierarchy levels. The topic of human rights also has a high priority at VOLKSBANK WIEN AG and is taken into account in the company’s core business. The Code of Conduct was established by the Supervisory Board and documents the values of VOLKSBANK WIEN AG in its internal and external relations (publication on the intranet and internet).

The Code of Conduct is the introduction to the working instruction “Compliance Manual” and is the responsibility of the Compliance department. With regard to responsible corporate behaviour with a focus on human rights, VOLKSBANK WIEN AG has two further guidelines, the Data Protection Manual and the Diversity Policy. All policies are subject to an approval process, regular updating and are approved by the Managing Board.

The Code of Conduct explicitly states that VOLKSBANK WIEN AG respects human rights and opposes child labour. Furthermore, the Code of Conduct states that any form of discrimination will not be tolerated. Volksbank values the dignity of human beings, their rights and their privacy. Therefore, VOLKSBANK WIEN AG has joined the UN Global Compact and supports its ten principles in the area of human rights, among others. To ensure compliance with human rights in the

company's core business, for example, industry sectors and business areas have been defined where the bank will not enter into business relationships. In addition, employee training events have been carried out, and care is taken to ensure that business partners comply with human rights. A policy statement by the Managing Board of VOLKSBANK WIEN AG and approved by the NAKO regarding the protection of human rights ("Human Rights Policy") underscores the existing position of Volksbank, emphasising the latter's corporate duty of care. It has been published on the bank's sustainability web page www.volksbank.at/nachhaltigkeit

See also Chapter 17.3 Qualitative information on social risks. Chapter 17.1 Qualitative information on environmental risks lit. a) applies to ESG aspects.

- b) Goals, requirements and upper limits for the short-, medium- and long-term assessment and management of social risks, as well as the measurement of performance based on these goals, requirements and upper limits, including the consideration of forward-looking information in shaping the company's business strategy and processes

The Association of Volksbanks will not enter into business relationships or financing transactions with industry sectors or in business areas that are in conflict with the fundamental values of the bank. This list of industry sectors and business areas includes, among others, business relationships associated with violations against, for instance, the ban on forced labour or child labour, against the European Convention on Human Rights or against obligations under labour and social law.

The social ESG targets and KPIs were defined and are reported on and controlled through the NAKO. They are geared to customer relationship, employee satisfaction and diversity.

Chapter 17.1. Qualitative information on environmental risks lit. (b) applies to ESG aspects.

- c) Strategies and processes for the direct and indirect cooperation with new or existing counterparties in relation to their strategies for mitigating and reducing socially harmful activities

In general, it can be said that VOLKSBANK WIEN AG fulfils its cooperative mission in the region. As the central organisation of the Association of Volksbanks, VOLKSBANK WIEN AG, or more specifically, since November 2019, the newly established company VB Infrastruktur und Immobilien GmbH, is also in charge of central purchasing for all regional Volksbanks. In this context, the company sets great store by sustainable products, regional suppliers and, if possible, environmental certificates. Due to the fact that most suppliers are Austrian companies, the risk of human rights violations or other social issues is minimal.

Framework conditions for sustainable procurement were entered into a matrix and assessed positively in an Association-wide committee in April 2022. A supplier's sustainability is determined by means of indicators (company headquarters located in Austria, sustainable concepts or certificates of the supplier available, location of production checked, etc.). In May 2022, the rules and regulations included in the appropriate matrices were approved within the Association of Volksbanks. These rules and regulations describe the further procedure depending on the result of the evaluation according to the matrix. In the event that offers are available from equivalent suppliers, the more sustainable supplier will be commissioned. The procurement matrix was successfully applied in 2023.

Based on the guideline on the Risk Assessment of Outsourcing Activities, all outsourcing activities of VOLKSBANK WIEN AG are reviewed using a defined standard process. A sustainability check is part of this process. The investigation by sustainability risks covers a wide range of questions (e.g. sustainability principles).

In accordance with the Code of Conduct, in the context of lending, attention is paid to the sustainability in the sphere of social concerns. For this reason, no business is conducted in socially harmful sectors (see also Chapter 1. Qualitative information on social risks, lit. b).

Moreover, in order to avoid social risks as well as governance risks, the following processes are applied to investments in the banking book:

- Risk analysis within the scope of credit line requests
- In the event of significant changes in credit risk due to these types of risk, a statement will be made during the holding period within the scope of the rating process.
- Ad hoc evaluation in the event of a new purchase, if possible

Details of strategies and procedures relating to customer relationships, employee satisfaction and diversity at VOLKSBANK WIEN AG are contained in the Sustainability Report in Chapter ESRS 2 SBM-3.

17.2 Corporate governance

CRR Art 449a in conjunction with Art 435

Qualitative information on environmental risks

- e) Responsibilities of the management body with a view to defining the risk framework, the monitoring and control of target implementation, strategies and measures associated with environmental risk management in relation to relevant transmission channels

Based on the sustainability strategy, the Managing Board has overall responsibility for implementing ESG aspects in internal governance structures, in the risk management framework and in relevant guidelines of the Association of Volksbanks, which are subject to regular review. The entire Managing Board is responsible for defining roles and competencies for managing sustainability risks within the three lines of defence of the business organisation and to ensure a clear assignment of tasks and duties. In this context, reporting lines and the responsibilities of individual functions must be clearly defined and delimited. The requirement of integrating sustainability topics into all areas falling within the sphere of competence of the CO under Section 30a of the Austrian Banking Act results in the necessity of control requirements being defined by the CO. As part of its monitoring of the entire Managing Board, the Supervisory Board of VOLKSBANK WIEN AG checks whether the latter takes comprehensive account of the principles of sustainability (ESG criteria) in managing the company. Topics from the NAKO are regularly reported to the Supervisory Board, and via the Sustainability Officers in the Volksbanks also to the supervisory boards of the primary banks.

The consideration of sustainability aspects was anchored in the rules of procedure of the Managing Board and the rules of procedure of the Supervisory Board. Members of the Supervisory Board and of the Managing Board regularly attend Fit & Proper training events that also deal with sustainability topics. Steering and control activities by the Managing Board are based on sustainability goals, which also include the monitoring of ESG risks. The Managing Board of VOLKSBANK WIEN AG (as the central organisation) has nominated a Sustainability Officer for the Association of Volksbanks whose task, in addition to managing, organising and determining the contents of the NAKO, is to prepare the sustainability strategy in coordination with the Managing Board and to prepare the sustainability reports.

The Sustainability Report contains all measures and goals implemented as well as an outlook on further plans with regard to the material topics of the Association of Volksbanks. Since the 2024 financial year, VOLKSBANK WIEN AG has been reporting on strategies, measures and targets as well as KPIs under the Corporate Sustainability Reporting Directive (CSRD).

f) Consideration of the short-, medium- and long-term effects of environmental factors and risks by the management body, organisational structure both within the divisions and within the internal control functions

The Association of Volksbanks aims to make its sustainability strategy measurable and controllable and to take account of major sustainability risks by using divisional goals, KPIs and KRIs. The Association of Volksbanks has determined a set of KPIs that cover the three ESG aspects and are relevant for controlling the ESG goals of the credit institution group. These KPIs are being implemented at present and will then be reported on in the NAKO on a current basis; the latter is also responsible for steering these efforts (see Chapter 17.1b Targets, requirements and upper limits).

Within the Association of Volksbanks, sustainability risks are not considered as a separate risk type, but are mapped within the existing risk types and accordingly are embedded in the existing organisational structure as an integral part of bank management and of the risk framework.

See also Chapter 17.2. Qualitative information on environmental risks, lit. e).

g) Integration of measures to manage environmental factors and risks into the internal governance rules, including the role of the committees, the allocation of tasks and responsibilities, and the feedback loop from Risk Management to the management body that covers the relevant transmission channels

The steering, coordination and monitoring of key sustainability issues is carried out by the bi-monthly Sustainability Committee (NAKO). The NAKO is a decision-making body of the entire Managing Board and serves to advise on and monitor all sustainability-related issues, ensuring that decisions are in line with the sustainability strategy and sustainability goals. The NAKO provides the Managing Board with a holistic view of sustainability-related topics for the Association of Volksbanks. The responsibilities include both subject areas of VOLKSBANK WIEN AG as a single institution and matters concerning the entire Association of Volksbanks. Members of the NAKO include, among others, the internal control functions Compliance and Risk Control.

According to the governance of the Association, the entire Managing Board of VOLKSBANK WIEN AG has ultimate responsibility, within the scope of its function, for implementing sustainability aspects in internal governance structures, in the risk management framework and in relevant guidelines, which are reviewed regularly. The Supervisory Board is committed to sustainability in all areas of the company and, as part of its monitoring of the entire Managing Board, checks whether the latter takes comprehensive account of the principles of sustainability in its management of the company.

The consideration of sustainability aspects is anchored in the rules of procedure of the Managing Board and the Supervisory Board. Members of the Supervisory Board and the Managing Board regularly attend Fit & Proper training events on sustainability to make sure they have sufficient technical knowledge and skills to manage sustainability aspects. The training courses cover the current regulatory requirements on sustainability and their implementation within the Association of Volksbanks. The Sustainability Officer is the contact person for sustainability in the Association of Volksbanks and coordinates cross-divisional implementation as well as regulatory requirements.

See also Chapter 17.2. Qualitative information on environmental risks, lit. e)

h) Reporting lines and frequency of reporting in relation to environmental risks

As ESG risks are mapped within existing risk types, reporting in connection with ESG risks takes place in the Risk Committee. For details regarding risk reporting, please refer to Chapter 2 Risk management and governance (in the CRR Disclosure as at 31 December 2024).

See also the information on the NAKO and on internal reporting, Chapter 2. Qualitative information on environmental risks, lit. e)

i) Alignment of the remuneration policy with the goals of the institution in connection with environmental risks

The remuneration policy of the Association of Volksbanks and its incentive systems rely on profitability, sustainability and other drivers of sustainable business, taking special account of risk, capital cost, and efficiency. They are geared to the future and designed to be in line with the performance outcomes of the Association and of the respective credit institution. The incentive systems take into account the sustainability goals of the Association, they are compatible with the risk strategy and with the Risk Appetite Framework, and they do not provide any incentives for taking excessive risks, incl. environmental risks.

1) Integration of sustainability in performance management

The remuneration policy of the Association of Volksbanks is designed to encourage sustainable and risk-conscious corporate governance. In keeping with regulatory requirements and with the business strategy, sustainability goals are integrated in performance management. Integration was resolved upon by the Remuneration Committee within the scope of General Instruction 15.0 in March 2025 and will be implemented until 30 June 2025.

The integration of sustainability goals in the performance management of managing board members and senior management within the Association of Volksbanks is decisive to ensure that sustainability is implemented as a central component of the business strategy. In this way, we can make sure that the strategic orientation of the Association of Volksbanks will result in sustainable development.

The performance management of managing board members and senior management supplements the existing model of employee profit sharing, which applies to all employees of the Association, except for managing board members. The disbursement of the profit share is linked to the achievement of corporate goals, including specific sustainability goals (see working instruction on remuneration policy at Association level). Senior management members are included, while managing board members do not participate in the employee profit-sharing scheme.

2) Strategic embedding of sustainability and integration in business development

The overriding mission and vision of the Association of Volksbanks are based on sustainability as a central pillar of its long-term business strategy. Moreover, sustainability goals are an integral part of business development, decisively influencing the product strategy and market positioning of the Association of Volksbanks. Sustainability goals are linked to business development on several levels:

- Product development: developing a sustainable product range.
- Customer strategy: use of the sustainability position to strengthen the company's market presence, to support the acquisition of new customer groups and to improve customer loyalty.
- Partnerships & innovation: cooperation with external partners in developing innovative solutions for sustainable financing.

Specific targets are derived from the business strategy that contribute to advancing sustainability in the financial sector:

- Advancing sustainable financing and a sustainable investment strategy by developing and offering ESG products.
- Minimising environmental effects by reducing carbon emissions and improving energy efficiency.
- Preserving and protecting biodiversity through the bank's strategic orientation.
- Increasing customer orientation through optimised customer service and a range of targeted financing products and consultancy.

- Increasing employee satisfaction and loyalty.
- Encouraging diversity and inclusivity, especially increasing the share of female executives.
- Facilitating the cooperative flow of dividends by supporting business projects and connecting sustainable activities in the region.

These strategic goals form the basis for sustainability-related performance indicators that are recorded in the course of performance management for managing board members and senior management of the Association of Volksbanks. The current sustainability goals are documented by the business strategy of the Association and the sustainability strategy of the Association, and managed in the Sustainability Committee.

3) Reporting structure

Based on the business strategy, specific sustainability goals were defined that are measurable and verifiable (see information on targets/goals above).

The achievement of the sustainability goals is systematically reported on in various boards to ensure transparency and regular control:

| Committee | Frequency | Topics |
|--|---|---|
| Sustainability Committee (Nachhaltigkeitskomitee, NAKO) | Every 2 months | ESG KPIs, progress in achieving sustainability goals |
| Supervisory Board | Every meeting | Mandatory ESG KPIs, sustainability topics (one focus topic per meeting), and sustainability reporting |
| General Meeting | Annually | Sustainability report including sustainability goals |
| Regional NAKOs and regional Supervisory Board meetings | Regularly according to rules of procedure | ESG KPIs and sustainability goals at the regional level |
| Meetings with sustainability officers of Volksbanks | Every 2 months | Progress of ESG KPIs and sustainability goals at the Association level |
| Meetings with "sustainability ambassadors" of all departments of VBW | Monthly | Progress of ESG KPIs and sustainability goals |
| Risk Committee | Monthly | ESG heatmaps and ESG scoring, quantification, decarbonization |

4) Linking up sustainability goals with performance management

The achievement of the sustainability goals is systematically integrated in performance management. Each managing board member and each executive at senior management level is given clearly defined sustainability goals that are documented as an integral part of annual performance measurement. The performance of managing board members is measured by the supervisory board of the respective Volksbank, that of senior management by the responsible managing board member.

This is done in the following way:

- Objective and responsibility:** Each managing board member is given individual sustainability goals in line with the strategic priorities of the Association and/or the respective Volksbank.
- Regular reporting:** Regular evaluation of progress through internal reports to the Sustainability Committee and the supervisory board.
- Documentation in the performance management tool or similar:** All relevant KPIs and measures are systematically entered in the SAP performance management tool (Goals & Objectives) or any comparable in-house system, and documented for each responsible person.

- d) **Feedback and improvement process:** Based on the KPI results, annual target discussions are held to analyse the progress made and to adjust the measures with a view to target achievement if necessary.

5) Accountability for achieving the sustainability goals

Even without variable remuneration, accountability for the achievement of sustainability goals is ensured through clear control mechanisms, regular reporting and by embedding the goals within the strategy.

a) Integration in performance assessment

- Sustainability goals are an integral part of the annual performance assessment of managing board members and senior management.
- Senior management members are evaluated in the course of appraisal interviews, while managing board members discuss their achievements in the annual financial statements and subsequent meetings.
- The results are documented transparently in the Annual Reports.

- b) **Supervision by the Supervisory Board:** The Supervisory Board of VOLKSBANK WIEN AG and of the Volksbanks monitors the implementation of the sustainability goals, requesting regular progress reports. If required, measures to ensure target achievement will be initiated.

- c) **Transparency and public reporting:** The progress towards the sustainability goals is published annually in the sustainability report to transparently present successes and challenges for stakeholders.

- d) **Stakeholder engagement:** Through regular discussions with investors, customers and other stakeholders, the bank wants to ensure that sustainability goals are actively taken into account in the business strategy and that evidence of the progress made is provided.

- e) **Embedding of goals in the company's long-term strategy:** The sustainability goals are an integral part of our long-term business strategy, influencing the performance, reputation and market position of the Association of Volksbanks.

- f) **Mandatory regular reporting:** Managing board members are obliged to regularly report to the supervisory board and to internal committees, aiming to make the progress and the challenges achieved or met in implementing sustainability goals transparent and to encourage a corporate culture of sustainability.

These measures provide for effective control and monitoring of sustainability goals within the Association of Volksbanks.

As the central organisation, VOLKSBANK WIEN AG develops and implements strategies that have a long-term positive impact on the economy, the environment and on society. By integrating sustainability indicators in the remuneration and performance management system of managing board members and senior management, and through the close link between remuneration and these goals and the relevant performance, the company makes sure that the Association of Volksbanks strives to make a positive contribution to overcoming global challenges and promoting sustainable development.

Qualitative information on social risks

- d) Responsibilities of the management body with a view to defining the risk framework, the monitoring and control of target implementation, strategies and measures associated with the management of social risks in relation to the approaches of the counterparties in the following areas:

The information on responsibilities, goal setting, monitoring, administration, strategy, and risk management contained in Chapters 17.1. and 17.2. Qualitative information on environmental risks, lit. e) applies to ESG aspects.

(i) Activities oriented towards society and the community

Assuming responsibility and making a contribution to the common welfare is an integral part of the vision of the Association of Volksbanks due to its cooperative structure. The mission of the cooperative is to advance the welfare of its members. Social and arts facilities as well as sports associations are supported in a spirit of partnership. The focus here is on long-term, integral concepts and mutual learning from each other. The basic criteria for determining whether a cooperation is suitable and relevant for the Association of Volksbanks are precisely defined and were laid down in guidelines for regional and sustainable sponsorships. One essential aspect of the sustainability policy of the Association of Volksbanks is to support sports, cultural and social/charitable activities, thus making an important contribution to society at large. Sports and athletics play an extremely important role within society. The Association of Volksbanks focuses on providing children and young people with opportunities to do sports. The targeted promotion of Austrian sports activities and the associated enhanced presence of such activities in the population may lead to increased sports enthusiasm and hence improved physical and mental fitness in the long run. In 2021, the Association of Volksbanks established guidelines on the topic of sustainable sponsorships, which describe sponsorship and promotion principles across the Association to support the regional approach.

(ii) Employer/employee relations and labour standards

The Association of Volksbanks builds on a relationship based on trust – because when it comes to banking, mutual trust has been a bond with customers for many years. The same is also very important to the Association of Volksbanks as an employer in the relationship with its employees. That is why the Association relies on mutual trust through partnership.

As a central element of the HR strategy, a promise to employees was formulated by the managing boards of the banks of the Association, which is supported by the employer values and the strategic HR guiding principles, addressing the challenges and opportunities arising from the current environment: “As a modern and customer-oriented regional bank, we promise you performance-based remuneration with flexible working models in a corporate culture based on trust. Within the scope of our sustainable business model, we offer meaningful work that we support through top-level training and development opportunities.”

Employees represent and combine the company’s authentic employer values – encounters at eye level, the courage to get involved, and making the company ‘fit for the future through flexibility’ – by working together. Behind all three employer values is a value commitment that the individual affiliated banks make vis-à-vis their employees. This value commitment has become an integral part of the value framework practiced within the Association of Volksbanks, helping the affiliated banks to improve as employers. As part of the organisation’s positioning as an attractive employer, great importance is attached to training and education, flexible working hours, equal rights, recognition, innovation, and self-fulfilment. The Association of Volksbanks is building on this, because this is how Volksbank will remain fit for the future and sustainably successful.

For years, the Association of Volksbanks has been committed to a fair and positive working environment for all employees, with a strong focus on diversity and inclusion. First and foremost, all employees are valued and treated equally. The aim of “living diversity” is to create an organisational culture where no one is disadvantaged and everyone is able to develop and unfold their potentials. This increases productivity, motivation and social skills and brings sustainable success to the company and all employees. In the Code of Conduct, to which all employees are bound, the Association of Volksbanks states that it expressly respects human rights and rejects any form of discrimination.

For the Association of Volksbanks, further training is an essential component of HR development and employee retention in order to ensure and develop the knowledge and skills of the employees required to implement the “relationship bank of the future” strategy throughout the Association. In this context, the services of Volksbank’s own academy (Volksbank

Akademie) are used, which provides needs-based training courses with optimal coordination between executives, technical experts and HR management. The Association of Volksbanks relies on mutual trust through partnership. This includes listening to, and systematically using, employee feedback to develop the organisation and executives. This is operationalised in the form of employee surveys and appraisal interviews.

The Association of Volksbanks is proud of its executives and employees, who contribute a high degree of professionalism as well as technical, interdisciplinary and social skills. In order to be able to guarantee and develop these resources in the long term, an annual appraisal interview is held between supervisors and employees. The aim is to look back on the past period, to reflect on the joint successes, learnings and areas of development, and to define and plan further joint goals. In order to ensure equal rights, the Association of Volksbanks primarily implements measures for the advancement of women with a view to equal opportunities. The overriding goal of cross-company measures for the advancement of women is to reduce or prevent the underrepresentation of women in senior positions. The proportion of women in managerial positions is meant to increase steadily to achieve equal participation in decision-making and responsibility.

The Association of Volksbanks is convinced that the compatibility of professional and private life is decisive for the quality of life and the health of its employees. HR management sets itself the strategic goal of making this possible. A healthy and successful work-life balance is meant to be facilitated by flexible working hours and workplace models.

Within the framework of operational safety, a working instruction has been drawn up that contains the main tasks and obligations arising from the Austrian Industrial Safety Act (ArbeitnehmerInnenschutzgesetz; ASchG) for the Association of Volksbanks. According to the ASchG, employers are obliged to ensure the safety and health of employees with regard to all work-related aspects. Employees are obliged to comply with applicable protective measures and to follow the employer's instructions. The implementation of the ASchG within the Association of Volksbanks as well as compliance with or observance of the provisions of other laws such as the Austrian Workplace Ordinance (AStV) are described in an internal working instruction. Furthermore, all required documents must be made available digitally at every workplace. Each retail branch is responsible for updating these documents, and at the headquarters, this is done by the safety officer.

Details of VOLKSBANK WIEN AG are also provided in the Sustainability Report in Chapter S1 "Employees". www.volksbank.at/nachhaltigkeit

(iii) Protection of customers and product responsibility

Following the introduction of the sustainability preference query in 2022, account managers are obliged to ask their customers about their wishes in terms of sustainability during their personal consultations. Based on the customers' goals and wishes regarding sustainability, account managers must not recommend any product unless it is in line with the customers' sustainability preferences. A committee of experienced investment specialists from the Association of Volksbanks develops and decides on product proposals from the area of investment funds and certificates. The product proposals are reviewed in the course of the investment process with regard to sales approval, tax transparency and MiFID regulations, as every MiFID-II-relevant product actively offered to a customer in the Association of Volksbanks has to pass a product approval procedure to be documented in advance. However, a successfully tested product may only be included in the product range (Volksbank master list) if it is in line with the business strategy of the Association of Volksbanks.

As regards responsible corporate behaviour with a focus on human rights, a number of guidelines have been established across the Association. Throughout the Association of Volksbanks, the "Data Protection Manual" on data protection (a human right) applies as a uniform guideline and was approved by the Managing Board. Additionally, data protection management has been implemented in all banks of the Association.

Details regarding the protection of customers and product responsibility at VOLKSBANK WIEN AG are contained in the Sustainability Report in Chapter S4.

Financial Literacy

With the support of cooperative associations – including the ÖGV – the first student cooperatives were launched in 2021. The idea behind this: The young generation should get to know the successful model of cooperative business in a practical way. Along the way, important skills such as self-initiative, creativity and team spirit are conveyed as well.

Moreover, the Association of Volksbanks supports other financial literacy initiatives like “Schoolgames”, where students can score with scientific knowledge in a playful way.

(iv) Human rights

The Code of Conduct explicitly states that the Association of Volksbanks respects human rights and opposes child labour. This commitment is supplemented by the “Policy Statement of the Managing Board of VOLKSBANK WIEN AG on the Protection of Human Rights”, which is published on the homepage of VOLKSBANK WIEN AG. Furthermore, the Code of Conduct states that any form of discrimination will not be tolerated. Volksbank values the dignity of human beings, their rights and their privacy. Therefore, VOLKSBANK WIEN AG has joined the UN Global Compact and supports its ten principles in the area of human rights, among others. To ensure compliance with human rights in the company’s core business, for example, industry sectors and business areas have been defined where the bank will not enter into business relationships. In addition, employee training events have been carried out, and care is taken to ensure that business partners comply with human rights.

See also the policy statement on the protection of human rights (“Human Rights Policy”) of VOLKSBANK WIEN AG: www.volksbank.at/nachhaltigkeit.

- e) Integration of measures to manage social factors and risks into the internal governance rules, including the role of the committees, the allocation of tasks and responsibilities, and the feed-back loop from Risk Management to the management body

See Chapter 17.1 Qualitative information on environmental risks as well as Chapter 17.2 Qualitative information on environmental risks, lit. e) and g); the information applies to ESG aspects.

- f) Reporting lines and frequency of reporting in relation to social risks

See Chapter 17.2 Qualitative information on environmental risks, lit. h); the information applies to ESG aspects.

- g) Alignment of the remuneration policy with the goals of the institution in connection with social risks

Within the scope of aligning our remuneration policy with the goals of the Association of Volksbanks, especially with a view to social risks, we consider a fair and balanced remuneration to be very important. This includes both a reasonable fixed and also variable remuneration that is in line with our sustainable cooperative business model. Additionally, various sustainability factors are taken into account to achieve sustainable goals and to promote long-term value creation within the Association of Volksbanks. These sustainability factors include the following:

Compliance with labour law standards: We are committed to strictly comply with all applicable labour law provisions, thus ensuring the protection of our employees’ rights.

Occupational health and safety: The protection of the health and safety of our employees is a top priority for us. We strive to provide a safe working environment and take initiatives to promote the well-being of our employees.

Appropriate remuneration: Our remuneration policy provides for both fixed and variable remuneration components matching the sustainable cooperative business model and promoting the long-term stability of the credit institution.

Fair working conditions, diversity, as well as training and further education: We lay great store by fair working conditions, and we actively promote diversity among our staff. Additionally, we support our employees on their career journey by offering targeted education and further training.

Fighting inequality: We are committed to oppose any form of inequality, and we promote equal opportunities within our association.

Encouraging social cohesion: Strengthening social cohesion among employees and beyond is one of the central concerns of our remuneration policy.

These factors essentially contribute to supporting the sustainability goals and to creating added value within the Association of Volksbanks in the long term.

Qualitative information on governance risks

- a) Integration of the efficiency of counterparties in corporate governance terms into the governance rules of the institution, including the committees of the top management body and the committees responsible for making decisions in economic, environmental and social matters

Significant counterparties in the value chain of the Association of Volksbanks are suppliers and customers. Based on exclusion criteria, the Association of Volksbanks has defined undesirable industry sectors where the bank will not enter into any business relationships, and in retail banking the company takes account of governance risks in the form of a Soft Facts ESG Score. The efficiency of the counterparty in corporate governance terms (decision-making, monitoring and steering process of the counterparty at all levels) is not considered directly, but exclusion criteria may nevertheless result in a business relationship being terminated or not even started.

- b) Integration of the role of the top management body of the counterparty into the reporting of the institution on non-financial information

The role of the top management body or the materiality analysis of the counterparty are not directly taken account of in the reporting of the institution on non-financial information.

- c) Integration of the efficiency of counterparties in corporate governance terms into the governance rules of the institution, including the following aspects:

- (i) *Ethical considerations*

The Code of Conduct documents the values of VOLKSBANK WIEN AG in its internal and external relations (publication on the intranet and internet). To implement the principles anchored therein and to support the bank's employees in avoiding mistakes and in strengthening the trust of customers and business partners in VOLKSBANK WIEN AG, accompanying measures have been implemented, among others:

- a clear organisational structure with defined responsibilities,
- structured written rules,
- target group-oriented training with practical examples,
- annual appraisal interviews,
- specialised staff in the Compliance function,
- a stringent complaints procedure, and
- transparent and consistent sanction processes.

VOLKSBANK WIEN AG reserves the right not to enter into business relationships or financing transactions with industry sectors or in business areas that contradict the bank's fundamental values. This list of industry sectors and business areas includes, among others, business relationships related to the following topics:

- Forced labour or child labour
- Violations against the European Convention on Human Rights, or of obligations under social and labour law
- Corruption
- Violations against environmental protection in general (environmental hazards, intentional violation of environmental protection regulations, increased contamination, etc.)
- Animal testing
- Ownership and operation of nuclear power plants or operation of final disposal sites for nuclear waste
- Mining of coal or operation of coal-fired power plants
- Arms deals
- Particularly controversial forms of gambling

Undesired industry sectors and business areas are evaluated continuously and adjusted if necessary.

(ii) Strategy and risk management

Based on the General Instruction on the Risk Assessment of Outsourcing Activities, all outsourcing activities of the Association of Volksbanks are reviewed using a defined standard process. A sustainability check is part of this process. Checking for sustainability risks covers a wide range of issues, e.g. whether the service provider endangers the environment and/or biodiversity, is heavily dependent on resources such as coal, gas, oil, water, etc. or has established sustainability principles.

The Association of Volksbanks has comprehensively integrated ESG risks into its risk framework and created corresponding framework conditions (*for details see Chapter 17.3 Risk management*).

(iii) Inclusivity

Based on the General Instruction on the Risk Assessment of Outsourcing Activities, all outsourcing activities of the Association of Volksbanks are reviewed using a defined standard process. A sustainability check is part of this process. The investigation by sustainability risks covers a wide range of questions, e.g. whether the service provider has established sustainability principles.

Within the scope of the lending process, the soft facts of the ESG Score include aspects regarding employees and consumers as well as ethical standards (ESG, supply chain). See the information on the ESG Score (*Chapter 17.3 Qualitative information on environmental risks, lit. I), Risk identification*).

(iv) *Transparency*

The soft facts of the ESG Score comprise all three risk aspects (Environmental, Social and Governance). Moreover, certain aspects regarding corporate governance are taken into account in the soft facts of the rating models applied. This creates transparency.

The General Instruction on the Risk Assessment of Outsourcing Activities creates transparency.

(v) *Management of conflicts of interest*

The Supervisory Board has implemented the Code of Conduct, which stipulates that the bank ensures that conflicts of interest are identified and mitigated. In operational terms, this requirement is implemented in the General Instruction on Compliance and in the corresponding working instruction of the Association. In addition, the executive bodies have their own "Policy for dealing with conflicts of interest". Conflicts of interest are reported in regular compliance reports; the Supervisory Board, which includes representatives of the works council, also receives these reports. Reports are submitted to the Supervisory Board at least once a year and to the Managing Board on a quarterly basis.

(vi) *Internal communication regarding critical matters*

Based on the General Instruction on the Risk Assessment of Outsourcing Activities, all outsourcing activities of the Association of Volksbanks are reviewed using a defined standard process. A sustainability check is part of this process. The investigation by sustainability risks covers a wide range of questions, e.g. whether the service provider has established sustainability principles.

The soft facts questionnaire includes aspects regarding ethical standards (ESG, supply chain and internal governance).

See the information on the ESG Score (Chapter 17.3 Qualitative information on environmental risks, lit. I), Risk identification).

The main product partners of the Association are domiciled in Austria and Germany and hence are subject to the strict requirements applicable to companies under EU regulations.

See also Chapter 17.1. Qualitative information on social risks, lit. c).

17.3 Risk management

CRR Art 449a taking account of Art 435 CRR

Qualitative information on environmental risks

j) *Integration of short-, medium- and long-term effects of environmental factors and risks into the risk framework*

The Association of Volksbanks has comprehensively integrated ESG risks into its risk framework and created corresponding framework conditions. For example, the Risk Appetite Framework (RAF) for the Association of Volksbanks has been developed further and explicitly takes ESG risks into account in its specifications.

- Central control of ESG risks by the Risk Management function
- Involvement of the Managing Board with a view to identifying and managing ESG risks
- Quarterly reporting to the Supervisory Board about progress in terms of integrating ESG risks
- Application of high regulatory standards as an ECB-audited institution
- Standardised identification of ESG risks within the scope of the risk inventory process
- Calculation of ESG-related scenarios in the internal stress test
- Evaluation of ESG aspects in the course of the new product process
- Assessment of outsourcing risks extended by ESG aspects
- Reflection of the findings from the internal stress test and risk inventory in the risk strategy of the Association
- Quantification of ESG risks for certain risk types in the risk-bearing capacity calculation
- Consideration of ESG risks within the scope of regular risk reporting

On the one hand, the risk strategy of the Association maps ESG risks via a specially formulated sub-risk strategy; on the other hand, important findings from the risk identification and assessment process are described in the sub-risk strategies for existing risk types. The sub-risk strategy for ESG risks was determined at the level of the Association and is applied to all affiliated banks as part of the local risk strategies.

Details on the RAF and the risk strategy are included in Chapter 2 Risk management and governance (in the CRR Disclosure as at 31 December 2024).

k) Definitions, methods and international standards that the framework for environmental risk management is based on

Environmental, social and governance risks (ESG risks) refer to operational risk events or conditions affecting the climate, the environment, social affairs or corporate governance, the occurrence of which could have an actual or potential negative impact on the value of assets or on the net assets, financial position and results of operations, as well as the reputation of the Association of Volksbanks. ESG risks arise because climate, environmental, social and governance matters (ESG factors) may affect counterparties, customers and other contractual partners of the Association of Volksbanks. ESG risks comprise the following sub-risk categories:

Climate and environmental risks are the risks arising from exposures of the Association of Volksbanks to counterparties, customers and other contractual partners that may contribute to or be affected by climate change or other forms of environmental degradation. Climate and environmental risks can manifest themselves in physical risks or transitory risks. Physical risks arise as a result of changing climatic and/or environmental conditions. Transitory risks arise as a result of the adjustment process toward a lower-carbon and more environmentally sustainable economy.

Social risks are risks arising from exposures of the Association of Volksbanks to counterparties, customers and other contractual partners that are negatively impacted by the neglect of social aspects.

Risks in the area of corporate governance are risks arising from exposures of the Association of Volksbanks to counterparties, customers and other contractual partners that are negatively impacted by the neglect of appropriate corporate governance.

Within the Association of Volksbanks, ESG risks are not considered as a separate risk type, but are mapped within the existing risk types.

In the spring of 2023, VOLKSBANK WIEN AG, representing the Association of Volksbanks, joined the TCFD to emphasise the importance of sustainability- and climate-related risks and opportunities. A TCFD GAP analysis was performed, involving all relevant specialist departments. Reporting in accordance with the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD) focuses on risks and opportunities arising from the consequences of climate change.

Companies should describe these risks and opportunities and how to deal with them in more detail, thereby helping to strengthen the resilience of companies and financial market stability as a whole. In the reports and also in the present document, the missing information on the TCFD was and is continuously supplemented and disclosed.

As regards the requirements of various stakeholders in terms of transparency and disclosure (supervisory authority, rating agencies, auditors, customers, etc.), we are in the process of joining the following initiatives and standards, in particular:

- PCAF (= Partnership for Carbon Accounting Financials): standardised method to measure carbon emissions (= basis for managing climate risks)
- SBTi (= Science Based Targets Initiative): initiative aiming at the definition of scientifically sound climate target

1) Process for identifying, measuring and monitoring activities and exposures (and collaterals, if any) susceptible to environmental risks, including relevant transmission channels

Risk identification

The Association of Volksbanks basically considers ESG risks as material. Therefore, ESG risks are regularly analysed and reassessed as part of the risk inventory by means of an ESG Materiality Assessment and using ESG heat maps. The ESG Materiality Assessment and the ESG heat maps are tools to identify, analyse and assess the materiality of ESG risks and/or their risk drivers.

In the 2nd half of 2024, the ESG Materiality Assessment for the customer loan portfolio was introduced and resolved upon within the scope of the 2025 risk strategy of the Association. In the Materiality Assessment, different scenarios as well as the following time horizons are considered:

- the short-term horizon is one year,
- the medium-term horizon extends from one to five years, and
- the long-term horizon extends beyond five years, covering ten years as a minimum.

The new process takes effect upon the 2025 risk strategy of the Association being adopted and is going to be refined and developed for the remaining risk types in 2025. Regulatory requirements and more specific information are considered in the processes.

At present, 17 different risk events (e.g. increased costs due to CO₂ taxes, extreme weather events, loss of biodiversity, water stress, land use, etc.) are described and evaluated in the ESG heat maps for all other risk types. These risk events are derived from the United Nations Sustainable Development Goals (SDGs). The assessment of the impact of risk events is based on a medium- to long-term horizon of five to ten years. The underlying economic conditions in the assessment are those of an orderly transition to a lower-carbon economy. The application of ESG heat maps enables ESG risks to be systematically recorded across risk factors and risk drivers and allows those risk events to be identified that have the greatest impact from the perspective of the Association of Volksbanks.

Within the scope of the regular revision, risk events, risk drivers and assumptions are made plausible and/or verified based on the results available. The risk events are assessed and re-evaluated along qualitative classification criteria by the respective risk owner. This is based on the existing ESG heat maps in each case; reclassifications will take place whenever they can be justified on the basis of new insights or extended expertise. The classifications obtained in the course of the heat map process will be aligned within the scope of the risk inventory process as a final step and resolved upon in the Risk Committee. Subsequently, the results will be integrated into the risk strategy of the Association, with any measures being derived therefrom if required.

A separate scoring system was developed for assessing the risks associated with ESG factors at the level of the individual borrower, which is applied to Corporate and Real Estate customers depending on credit exposure. By means of the

assessment of soft facts by account managers, the risks associated with ESG factors as well as the risk-mitigating measures taken by the customers are evaluated in the context of an ESG Score. The soft facts, which are tailored to the customer segments, cover all three risk aspects (environmental, social and governance). Apart from the ESG factors, sustainability criteria equally inform the customer rating in the course of the rating process, by way of evaluating additional parameters (e.g. regarding a sustainable business model, management quality, short- and medium-term investment needs, or regarding dependencies on external factors).

The ESG Score is designed to take into account both industry risks (results from the ESG heat map) and customer awareness and actions in relation to ESG factors. In quantitative terms, the additional assessment of customer-specific soft facts (evaluation of qualitative information), in addition to industry-specific ones, results in an ESG Score, which can subsequently be used to classify ESG risks. The lending decision is not directly based on the ESG Score itself; rather, individual risks will be considered for the individual customer in assessing their repayment ability or within the scope of a sensitivity analysis (e.g. improvements to reduce carbon emissions or developments with a view to circular economy).

An assessment of the risks associated with ESG factors takes place within the scope of the lending and monitoring processes. The assessment of the borrower's ability to service the debt is generally made taking into account the borrower's current and future financial circumstances, with risks to the future financial and liquidity position having to be included in the consideration. The credit decision must therefore also take into account transitory and physical environmental risks. The manufacturing, energy supply, sewage management, waste management, and transport sectors in particular are currently undergoing a major transformation process with regard to the reduction of carbon emissions. For customers in these sectors, the front office statement should therefore address – in addition to the ESG Score – the extent to which costs/efforts for high CO₂ emissions or for the transformation towards low-carbon economic activities are incurred by the customer. In doing so, onerous or hazardous aspects in relation to the customer's earning power and business model need to be assessed.

Furthermore, the statement must address if a financed property is located in a hazard zone (e.g. flood, avalanche danger, landslides). As it may be assumed that there is insufficient insurance cover for properties in hazard zones, an assessment must be made as to whether there are reserves in the customer's financial position to cover any losses.

Climate and environmental risks are examined as part of the valuation of commercial and residential properties. This is done by examining environmental impacts (noise, flooding, hazard zones), energy efficiency, and use of fossil fuels. For this purpose, climate and environmental influences (noise, flooding, hazard zones), energy efficiency (energy certificate, year of construction, year of refurbishment) and the use of fossil fuels (oil, gas) are documented and incorporated into the assessment. If a real property is located within the sphere of any climate or environmental hazard, the assessment must indicate if this fact is relevant in terms of value and if a corresponding impairment must be recognised.

Risk assessment

Within the Association of Volksbanks, ESG risks are mapped in existing risk types (e.g. credit, market and operational risk). The management of ESG risks is therefore carried out using existing risk types and is being driven forward by successively expanding the quantification methods and the related data basis and enriching them with new findings.

Quantification of ESG risks through credit risk

The assumptions regarding expected losses are still considered to be reasonable. However, overall economic uncertainties arising from ESG risks (e.g. CO₂ pricing, increasing physical risks, compliance costs) may systematically influence the economic valuation and hence are measured as part of unexpected losses.

For the purpose of quantifying ESG risks, an ESG credit spread premium (exceeding the currently used credit spreads) per rating level and maturity is calibrated. The derivation is based on the difference in GDP development in the NGFS scenarios “Orderly Transition” and “Disorderly Transition Front Loaded”.

Application in the loan portfolio model

- Simulation of impairments for the unsecured portions of the performing exposures of Corporates.
- For Private Customers and for other positions, no ESG risk is currently provided for.

Quantification of ESG risks in operational risk

Within the scope of the annual analysis of operational risk, various negative scenarios are considered. These scenarios are classified in terms of any relation to ESG risks, for longer-term ESG risk trends to be subsequently derived therefrom.

Risk monitoring

The ESG Score is updated once a year within the scope of the annual credit review. Any climate-related transitory and physical risks are taken into account as part of the lending and monitoring process in assessing the creditworthiness of the customer. For instance, when checking the customer’s repayment ability, the way in which climate change (e.g. transformation costs) will impact on the customer’s business is critically analysed. Aspects that burden or jeopardise the customer’s sustainable profitability, their assets and/or their business model must be reported and taken into account when assessing the customer’s creditworthiness.

In the course of a regular industry analysis based on external, macroeconomic as well as internal (within the Association) and ESG factors, branches of industry associated with higher risks are identified, and measures are taken if necessary.

For the purpose of identifying those sectors and economic activities that have a greater negative impact on the financed emissions of the Association of Volksbanks due to higher GHG emission intensities, a 2024 decarbonisation strategy was adopted that includes measurable goals. For instance, investments in energy-efficient buildings or the redistribution of the loan portfolio through investments that cause less carbon emissions are monitored internally for measurement purposes. If the goal for the reduction of emissions is not reached, corresponding measures for new business in carbon-intensive sectors must be defined to counter that trend.

m) Activities, obligations and exposures that contribute to the mitigation of environmental risks

The Association of Volksbanks is committed to conducting lending operations in a sustainable and responsible manner. For this reason, we do not enter into business relationships in sensitive areas that conflict with this claim. Business relationships or financing transactions are not possible for traders in ethically questionable sectors and business areas, or are only possible in accordance with the rules of conduct specified by Compliance. In the context of lending, accordingly, attention is paid to the protection of the environment. Financed transactions must comply with environmental regulations. For this reason, no business is conducted in environmentally harmful sectors. In case of doubt, the matter needs to be discussed with Compliance in the course of assessing the business relationship or within the scope of granting credit lines. Defining undesirable branches of industry and business areas reduces the reputational risk of the individual primary banks and of the Association of Volksbanks.

As regards risk mitigation within the lending and monitoring process, reference is made to item l) Risk identification and risk monitoring, and the information on the ESG Score.

The new product process ensures that new products, markets, services and service providers are in line with the understanding of sustainability of the Association of Volksbanks, and that ESG risks can be identified and mitigated at an early stage. Based on the General Instruction on the Risk Assessment of Outsourcing Activities, all outsourcing activities of the Association of Volksbanks are reviewed using a defined standard process. A sustainability check is part of this process. Checking for sustainability risks covers a wide range of issues, e.g. whether the service provider endangers the environment and/or biodiversity, is heavily dependent on resources such as coal, gas, oil, water, etc. or has established sustainability principles.

n) Introduction of tools to identify, measure and manage environmental risks

In addition to the new product process, risk identification and assessment for ESG risks is carried out via the ESG Materiality Assessment and the internal stress test. As part of the internal stress test, ESG-related scenarios are simulated that reflect both physical and transitory risks as well as risk events from the social and/or governance categories. For example, the effects of extreme weather events as well as the rapid implementation of stricter requirements in connection with climate and environmental standards on the portfolio of the Association of Volksbanks are simulated. The scenarios are designed with respect to the portfolio composition of the Association of Volksbanks and also take into account the key assumptions of the NGFS (Network for Greening the Financial System). The time horizon for the scenario analysis of the internal stress test is 3 years. In addition to the internal stress test, an adverse scenario for a long-term horizon of up to 10 years is analysed for selected portfolios. In this longer-term climate scenario, the effects on relevant macroeconomic factors are derived on the basis of long-term NGFS scenarios, consolidated within the 10-year period of review, and the effects on the income statement of the Association of Volksbanks (in particular, the expected losses) are determined.

“Financed greenhouse gas emissions” (GHG emissions), so-called indirect and downstream emissions associated with the lending and investment activities of the Association of Volksbanks, are calculated using an ESG software. The Association of Volksbanks determines financed greenhouse gas emissions on the basis of the PCAF Standard (Partnership for Carbon Accounting Financials).

Investments (e.g. in renewable energies, in optimising supply chain and circular business management as well as in sustainable technologies and innovations) will compensate or reduce the emission intensity of carbon-intensive sectors continuously. To achieve the reduction of GHG emissions, various political and legal measures have been taken in Austria (such as subsidies for renewable energy and sustainable means of transport, laws to increase energy efficiency, waiver of fossil fuels). By improving the emission intensities in the real economy, the Association of Volksbanks expects to achieve a reduction of GHG emissions in the loan portfolio when credit liabilities in more carbon-intensive sectors are paid back with simultaneous credit growth in sectors with lower carbon emissions. Taking into account the effect from investments in the energy transition, a 2024 decarbonisation strategy with measurable goals was adopted for the Association of Volksbanks. For instance, investments in energy-efficient buildings or the redistribution of the loan portfolio through investments that cause less carbon emissions are monitored internally for measurement purposes. If the goal for the reduction of emissions is not reached, corresponding measures for new business in carbon-intensive sectors must be defined to counter that trend.

o) Results of the risk tools used and estimated effects of environmental risk on the risk profile with a view to capital and liquidity

The results of the scenario analyses within the internal stress test show that the internal hurdle rates are complied with throughout the stress test horizon. The effects of the longer-term climate scenario on the expected default rates of the loan portfolio are manageable. The analyses show that the Association of Volksbanks can maintain all regulatory capital ratios and adequate liquidity levels even if potential ESG risks materialise, and that the resilience of the business model is not jeopardised over the simulated period due to ESG risks.

For the effects of climate and environmental risks to be mapped appropriately using the risk assessment tools also in future, the latter are continuously being developed and adjusted to the current situation (environment, politics, regulations). Previous analyses have shown manageable effects in terms of capital and liquidity.

Physical risks

Acute and chronic physical risks were determined for each transaction or real estate collateral based on external data sources. For the portfolio in Austria, physical risks were evaluated by means of a scenario analysis, taking into account various data sources and forward-looking climate scenarios. The assessment of the physical risks of foreign exposures is based on the Think Hazard! data source. The exposures reported as “sensitive to physical risks” mostly concern acute physical risks (in Austria: primarily heavy rain, landslide, river floods, frost days, and snowfall). Chronic physical risks are of minor importance.

In line with the EBA ITS on supervisory disclosures of ESG risks under Article 449a CRR, the results of our analyses of physical climate risks are disclosed in Template 5. It shows the credit exposure of the Association of Volksbanks that is sensitive to physical climate risks, broken down by maturity among others. In addition to the information presented in Template 5, it should be noted that sensitivities to physical climate risks concern Austria’s mountainous regions, in particular, especially the federal Länder of Salzburg and Tirol.

Carbon emissions

The measurement of financed CO₂ emissions is effected in line with the PCAF standard and developed continuously. Directly captured carbon emission data are meant to be integrated in the next step. Details are provided in the Sustainability Report of the Association of Volksbanks in the Chapter “SUSTAINABILITY MANAGEMENT/Financed emissions (Scope 3)”. www.volksbank.at/nachhaltigkeit

p) Availability, quality and accuracy of the data and efforts to improve these aspects

Data are an essential factor with a view to identifying, measuring, monitoring and managing ESG risks. A comprehensive gap analysis (taking account of regulatory requirements, in particular the expectation of the ECB under the *Guideline on Climate and Environmental Risks* and the *EBA Guideline Loan Origination and Monitoring*) has already been carried out as part of the sustainability project of the Association of Volksbanks, and measures to close the gaps identified were initiated or implemented, among others the implementation of ESG scoring, determination of energy certificates, extended documentation requirement for climate and environmental risks within the scope of real estate valuations.

In order to achieve the strategic plans and ensure the requirements for ESG data, the Association of Volksbanks has set up an ESG data project – to continue and expand the topics addressed by the sustainability project – in particular for the lending portfolio. This project ensures the comprehensive ESG data requirements for internal control and risk management as well as sustainability reporting and regulatory disclosure.

Many of the planned initiatives have already been implemented:

- Collection of data for the quantification of acute and chronic physical risks in the loan portfolio.
- Within the scope of CRR disclosure/Template 5, quantification of exposures “sensitive to acute and chronic risks”. For the portfolio in Austria using different forward-looking climate scenarios (RCP 2.6, RCP 4.5, RCP 6.0 and RCP 8.5) and based on several external data sources (e.g. Copernicus, World Bank, ISIMIP, etc.).
- Collection of CO₂ emission data (Scope 1, 2 and 3) for the loan portfolio (in line with the PCAF standard).

- Calculation of financed CO₂ emissions: The emission data used for greenhouse gases (in CO₂e) for the corporate sectors come from the Statistical Office of the European Commission (Eurostat) and are publicly available there per NACE code. For property-specific emissions, the data source used was the 2021 Climate Protection Report of the Austrian Federal Environment Agency (see also Sustainability Report of the Association of Volksbanks, Chapter “SUSTAINABILITY MANAGEMENT/Financed emissions (Scope 3)”).
- Identification of ESG risks within the scope of the ESG Score by assessing questions about soft facts in relation to the customer (assessment is made by the account manager based on talks with customers).
- Labelling of sustainable financing

Acute and chronic physical risks were determined for each transaction or real estate collateral based on external data sources. For the portfolio in Austria, physical risks were evaluated by means of a scenario analysis, taking into account various data sources and forward-looking climate scenarios. The assessment of the physical risks of foreign exposures is based on the Think Hazard! data source.

In Austria, the share of companies subject to the NFRD (and hence companies that have to disclose their ESG data) is low, especially in the SME segment which is relevant for the Association. Moreover, there is currently no energy certificate database that covers the whole of Austria. Therefore, apart from the measures taken by the Association to collect ESG data directly from our customers, external ESG databases and data providers constitute essential sources of data. Hence, the Association supports external initiatives to establish ESG databases covering the whole of Austria, especially for SMEs, and is exchanging technical information with the OeKB (among others, participation in the ESG questionnaire of the OeKB tool for the tourism sector).

q) Description of upper limits for environmental risks (as drivers of risks subject to supervision) that are defined and will trigger escalations and exclusions if exceeded

Apart from the undesirable branches of industry and areas of business (see Chapter 17.3 Qualitative information on governance risks, lit. d)), external financing transactions are limited within the Association, due to the regional business model. The major part of admissible foreign exposure (currently no more than 5 %) originates from Germany and other European neighbouring countries.

The Association of Volksbanks aims to make its sustainability strategy measurable and controllable and to take account of major sustainability risks by using divisional goals, KPIs and KRIs. The Association of Volksbanks has determined a set of KPIs that cover all three ESG aspects and are relevant for controlling the ESG goals of the credit institution group. These KPIs are being implemented at present and will then be reported on in the NAKO on a current basis; this committee is also responsible for steering these efforts. *See also Chapter 17.1. Qualitative information on environmental risks, lit. b)*

r) Description of the link (transmission channels) between environmental risks and credit risk, liquidity and financing risk, market risk, operational risk, and reputational risk within the Risk Management framework

In assessing the impact of ESG risks, consideration was given to key transmission channels. Transmission channels explain how ESG factors can affect the Association of Volksbanks via counterparties, customers, contractual partners as well as invested assets. These transmission channels are mapped on the one hand via the scenarios of the internal stress test or via the risk events of the ESG heat maps. The following transmission channels were considered, for example:

- Profitability
- Real estate values
- Household incomes

- Performance of investments
- Cost of implementation of and compliance with regulatory requirements
- Legal costs

The qualitative assessment based on the ESG heat maps has shown that existing risks due to ESG risks will not materially increase overall. The quantitative results of the internal stress test confirm this finding.

The long-term integration of ESG aspects into the business model of the Association of Volksbanks is managed via the sustainability strategy, which is part of the business strategy. Building on existing initiatives such as the United Nations SDGs, the Paris Agreement on Climate Change and the United Nations Global Compact, it sets out concrete plans and corresponding framework conditions in connection with products and services.

Qualitative information on social risks

h) Definitions, methods and international standards that the framework for the management of social risks is based on

Being an employer as well as a user and provider of products and services, VOLKSBANK WIEN AG is in a position to influence human rights, and the company proactively assumes this responsibility within the scope of its corporate duty of care. The bank is convinced that a business model geared to sustainability is an absolute necessity for its continuing success; VOLKSBANK WIEN AG considers the protection of human rights as a core element of responsible corporate governance.

Representing the Association of Volksbanks in its role as central organisation of the latter, VOLKSBANK WIEN AG joined the United Nations Global Compact (UNGC) in 2018. By committing to the Ten Principles of the UNGC regarding human rights, labour, the environment and anti-corruption, the company emphasises the importance of responsible corporate governance and sustainability within the scope of its business model.

The principles regarding human rights, in particular, (Principle 1 and Principle 2) as well as the principles regarding labour (Principle 3 to Principle 6) focus on the protection of human rights. As a signatory of the UNGC, VOLKSBANK WIEN AG is committed to:

- supporting and respecting the protection of internationally proclaimed human rights within its sphere of influence (Principle 1),
- making sure that it is not complicit in human rights abuses (Principle 2),
- upholding the freedom of association and the effective recognition of the right to collective bargaining (Principle 3),
- eliminating all forms of forced and compulsory labour (Principle 4),
- effectively abolishing child labour (Principle 5),
- eliminating discrimination in respect of employment and occupation (Principle 6).

Additionally, VOLKSBANK WIEN AG is geared towards other initiatives relating to human rights issues:

- “Charta der Vielfalt” (advancing diversity and mutual respect within the company),
- Declaration of the ILO (International Labour Organization) and the core labour standards, and
- Oikocredit (advancing ethical investment, fair investments and social return).

Based on these international principles, VOLKSBANK WIEN AG undertakes to respect and advance human rights in all its business activities.

VOLKSBANK WIEN AG has implemented a Code of Conduct that constitutes an integral part of its corporate culture, taking all employees, including the management, up on their promise to comply with the CoC.

The Code of Conduct constitutes the basis of the bank's own commitment to sustainability, to dealing with any violations, and to the Ten Principles of the UNGC. This Policy Statement focuses on the bank meeting its duty of care; in this way, VOLKSBANK WIEN AG contributes to raising people's awareness, confirming corporate responsibility for the protection of human rights with respect to its own business activities and those along the supply chain.

- i) Process for identifying, measuring and monitoring activities and exposures (and collaterals, if any) susceptible to social risks, including relevant transmission channels
- j) Activities, obligations and assets that contribute to the mitigation of social risks

The Association of Volksbanks is committed to conducting lending operations in a sustainable and responsible manner. For this reason, we do not enter into business relationships in sensitive areas that conflict with this claim. Business relationships or financing transactions are not possible for traders in ethically questionable sectors and business areas, or are only possible in accordance with the rules of conduct specified by Compliance. In the context of lending, therefore, attention is paid to the sustainability of matters in the social sphere. For this reason, no business is conducted in socially harmful sectors.

- k) Introduction of tools to identify and manage social risks
- l) Description of how the upper limits for social risks are determined and in which cases these upper limits will trigger escalations and exclusions if exceeded
- m) Description of the link (transmission channels) between social risks and credit risk, liquidity and financing risk, market risk, operational risk, and reputational risk within the Risk Management framework

See also Chapter 3. Risk management lit. j) to r); the information refers to ESG aspects.

Qualitative information on governance risks

- d) Integration of the efficiency of counterparties in corporate governance terms into the risk management rules of the institution, including the following aspects:
 - (i) Ethical considerations
 - (ii) Strategy and risk management
 - (iii) Inclusivity
 - (iv) Transparency
 - (v) Management of conflicts of interest
 - (vi) Internal communication regarding critical matters

The Association of Volksbanks and its affiliated banks act in accordance with the highest ethical and professional standards and are therefore committed to conducting the lending business in a sustainable and responsible manner. For this reason, we reserve the right not to enter into any business relationships or financing transactions with sectors or in business areas

that are in conflict with these core values. This list of industry sectors and business areas includes, among others, business relationships related to the following topics:

- Forced labour or child labour
- Violations against the European Convention on Human Rights, or of obligations under social and labour law
- Corruption
- Violations against environmental protection in general (environmental hazards, intentional violation of environmental protection regulations, increased contamination, etc.)
- Animal testing
- Ownership and operation of nuclear power plants or operation of final disposal sites for nuclear waste
- Mining of coal or operation of coal-fired power plants
- Arms deals
- Particularly controversial forms of gambling

Business relationships or financing transactions are not possible for traders in ethically questionable sectors and business areas, or are only possible in accordance with the rules of conduct specified by Compliance.

Furthermore, in the context of lending, attention is paid to the protection of the environment and the sustainability of social concerns. Financed transactions must comply with environmental regulations. For this reason, no business is conducted in environmentally or socially harmful sectors.

As regards the identification and mitigation of conflicts of interest, stringent rules have been implemented within the Association of Volksbanks.

See also the information on the ESG Score (Chapter 17.3 Qualitative information on environmental risks, lit. I), Risk identification).

18 List of abbreviations

| | |
|-----------------|--|
| Abs/para | paragraph |
| ABS | Asset Backed Security |
| AER | Asset Encumbrance Ratio |
| afs | available for sale |
| ALMM | Additional Liquidity Monitoring Metrics |
| AMA | Advanced Measurement Approach |
| ARL/WI | working instruction |
| Art | Article |
| ASchG | ArbeitnehmerInnenschutzgesetz [Austrian act governing OH&S] |
| ASA | Alternative Standardised Approach |
| A-SRI | other systemically important institutions |
| AStV | Arbeitsstättenverordnung (Austrian Workplace Ordinance) |
| AT1 | Additional Tier 1 |
| BaSAG | Banken Sanierungs- und Abwicklungsgesetz [Act on the Recovery and Resolution of Banks] |
| BB | banking book |
| BIA | Basic Indicator Approach |
| BP/bps | basis point(s), 0.01 per cent |
| BWG | Bankwesengesetz, Austrian Banking Act |
| bzw. | and/or, respectively |
| CAS | Capital Adequacy Statement |
| CCF | Credit Conversion Factor |
| CDS | Credit Default Swap, derivative swap instrument on a loan loss |
| CEM | Current Exposure Method |
| CET1 | Common Equity Tier 1 |
| CO ₂ | carbon dioxide |
| COSO | Committee of Sponsoring Organizations of the Treadway Commission |
| CQS | Credit Quality Step |
| CRD IV | Capital Requirements Directive IV, Directive 2013/36/EU of the European Parliament and of the Council |
| CRE | Commercial Real Estate |
| CRO | Chief Risk Officer |
| CRR | Capital Requirements Regulation, Regulation (EU) No 575/2013 of the European Parliament and of the Council |
| CSA | Credit Support Annex |
| CSR | Corporate Social Responsibility |
| CSRD | Corporate Social Responsibility Directive |
| CVA | Credit Value Adjustment |
| CVaR | Credit Value at Risk |
| i.e. | that is |
| Dr. | Doctor |
| DVA | Debt Value Adjustment |
| EAD | Exposure at Default, outstanding exposure in the event of default |
| EBA | European Banking Authority |
| EBA IST | European Banking Authority – technical implementation standards |
| ECAI | External Credit Assessment Institution |
| EFE | expected future exposure |
| incl. | including |
| EM/OF | Own funds |
| ESG | Environmental, Social, Governance |
| ESRS | European Sustainability Reporting Standards |
| ETS 2 | Emissions Trading System |
| EU | European Union |
| EUR | euro |
| EVE | Economic Value of Equity |
| EWB/ILLP | individual loan loss provision |
| ECA | European Currency Area |
| EWS | Early Warning System |

| | |
|----------------|---|
| et seqq | and following (plural) |
| FH | financial holding |
| FMA | Austrian Financial Market Authority |
| FRA | Forward Rate Agreement, over-the-counter forward rate transaction |
| FVPL | Fair Value through Profit or Loss |
| FVTOCI | Fair Value through Other Comprehensive Income |
| FVTPL | Financial at Fair Value through Profit and Loss |
| FX | foreign exchange, foreign currency |
| GDP | gross domestic product |
| DOB | born |
| acc. to | according to |
| GKRM/RMP | Risk management principles |
| G-SRI | global systemically important institutions |
| P&L | income statement, profit & loss account |
| GRI | Global Reporting Initiative |
| GvK/GaC | group of affiliated customers |
| GI | General Instruction |
| GI RAF | General Instruction Risk Appetite Framework |
| HB/TB | trading book |
| hft | held for trading |
| HIKtG | Hypothekar- und Immobilienkreditgesetz (Austrian Mortgage and Real Estate Credit Act) |
| HR | Human Resources |
| htm | held to maturity |
| HQLA | liquidity buffer (High Quality Liquid Assets) |
| IAS | International Accounting Standards |
| ICAAP | Internal Capital Adequacy Assessment Process |
| ICMA | International Capital Market Association |
| ICS | internal control system |
| ILAAP | Internal Liquidity Adequacy Assessment Process |
| ILO | International Labour Organisation |
| IFRS | International Financial Reporting Standards |
| iHv. | in the amount of |
| incl. | included/including |
| IRB | Internal Rating Based, based on internal ratings |
| IRS | Interest Rate Swap, derivative swap instrument on variable interest rates |
| ISDA | International Swaps and Derivatives Association |
| iVm | in connection with |
| JRAD | Joint Risk Assessment Decision |
| KI/CI | credit institution |
| KIM-Verordnung | ordinance regarding real estate financing measures by credit institutions |
| CC | Credit Committee |
| SME | small and medium-sized enterprises |
| KPI | Key Performance Indicators |
| KP-V | Capital Buffer Regulation |
| KRI | key risk indicator |
| KRL | Capital reserve(s) |
| LCR | Liquidity Coverage Ratio |
| lit | littera, letter |
| LFZ | maturity, term |
| LGD | Loss Given Default |
| l&r | loans and receivables |
| LK | countries and municipalities |
| Mag. | Magister |
| MDA | maximum distributable amount |
| MiFID | Markets in Financial Instruments Directive |
| m | million |
| bn | billion |
| MUM | Monetary Union Member, country of the euro zone |
| NAKO | Sustainability Committee |
| NGFS | Network for Greening the Financial System |

| | |
|--------------|--|
| NHV/SO | Sustainability Officer |
| NII | Net Interest Income |
| NPL | non-performing loans |
| no. | number |
| NSFR | Net Stable Funding Ratio |
| ODP/OFXP | open foreign exchange position |
| OECD | Organisation for Economic Cooperation and Development |
| OEM | Original Exposure Method |
| OeKB | Österreichische Kontrollbank |
| OeNB | Österreichische Nationalbank, Austrian National Bank |
| UCI | undertakings for collective investment |
| ÖGV | Österreichischer Genossenschaftsverband (Austrian association of cooperatives) |
| OpR (OpRisk) | operational risk |
| O-SIIP | buffer for systemically relevant institutions |
| OTC | over the counter (derivatives) |
| p.a. | per annum, annually |
| PCAF | Partnership for Carbon Accounting Financials |
| PD | Probability of default |
| PLM | Problem Loan Management |
| POCI | purchased or originated credit-impaired financial assets |
| PSE | Public Sector Entity |
| PVBP | Price Value of a Basis Point |
| P2G | Pillar 2 Guidance |
| P2R | Pillar 2 Requirement |
| p&l | profit and loss |
| RAF | Risk Appetite Framework |
| RAS | Risk Appetite Statement |
| RCF | Risk Control Function |
| RL/Dir | Directive |
| RMF | Risk Management Function |
| RRE | Residential Real Estate |
| RST/Prov | provision |
| RTFR | risk-bearing capacity calculation |
| SA-CCR | standardised approach to counterparty credit risk |
| SDGs | Sustainable Development Goals |
| SBTi | Science Based Targets Initiative |
| SPPI | Solely Payments of Principal and Interest |
| SREP | Supervisory Review and Evaluation Process |
| STA | standardised approach |
| T1 | Tier 1 |
| T2 | Tier 2 |
| TC | Total Capital |
| TCFD | Task Force on Climate-Related Financial Disclosures |
| KEUR | euro thousand |
| GHG emission | financed greenhouse gas emission |
| TLTRO | targeted longer-term refinancing operations |
| UGB | Unternehmensgesetzbuch, Austrian Business Code |
| UNGC | United Nations Global Compact |
| VaR | Value at Risk |
| VB | Volksbank |
| VKrG | Austrian Consumer Credit Act |
| VO/Reg | Regulation |
| FTE | full-time equivalent |
| Z | number |
| e.g. | for example |
| CO | Central Organisation |