

Luminor Bank Annual Report 2025

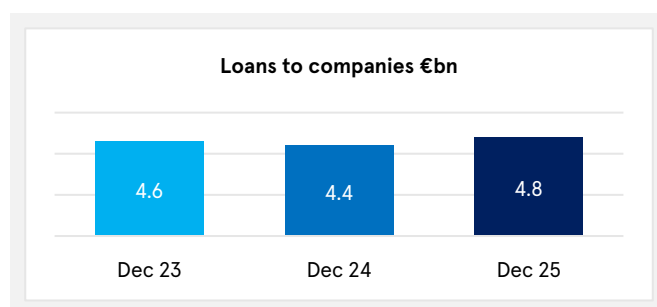
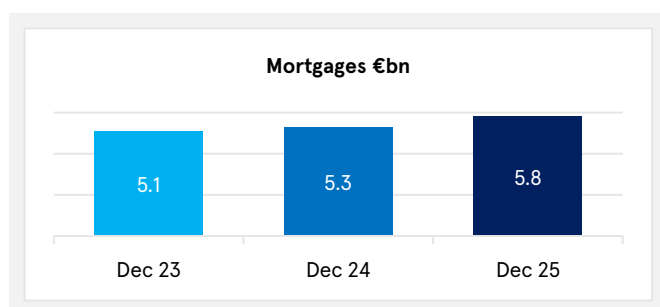
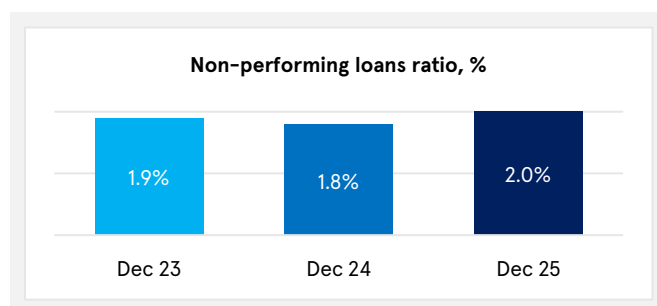
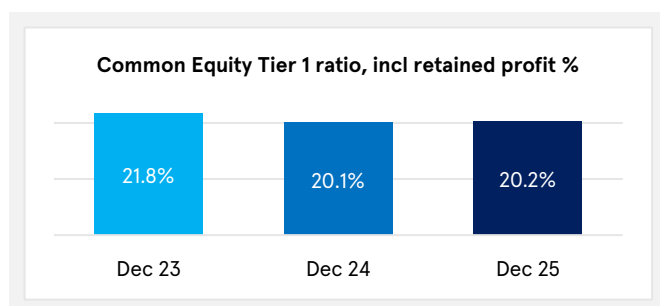
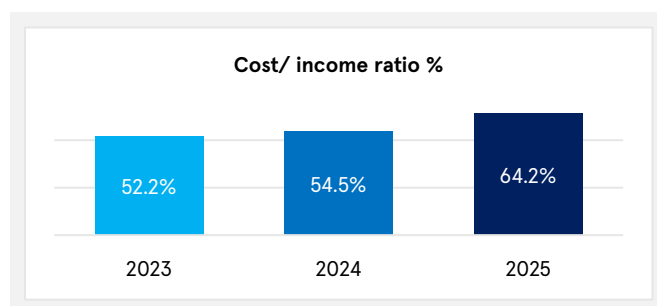
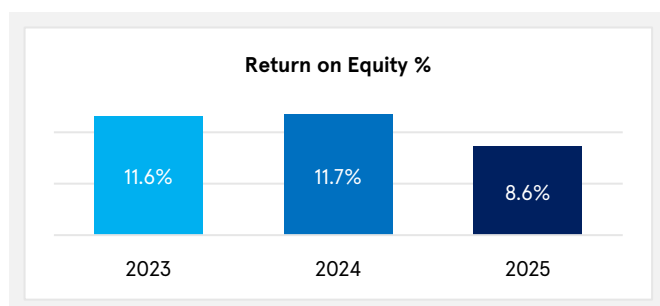
INTRODUCTION

At a glance

OUR YEAR IN BRIEF

- We made clear progress implementing our refreshed strategy
- We recorded profit for the period of 157.7 million EUR (2024: 202.2 million EUR), and generated a Return on Equity of 8.6%
- We grew lending by 9.1% and deposits by 1.4%, and maintained lending quality, with Stage 3 loans at 2.0% of gross lending
- Our liquidity and capital ratios remained strong with an LCR of 174.6%, MREL of 35.54%, and CET1 of 20.2% at year end
- Karl von Rohr was appointed Chairman of the Supervisory Council effective 1 January 2026

PERFORMANCE IN BRIEF



ABOUT US

Luminor is the leading independent bank in the Baltics and the third-largest provider of financial services in our region. We serve the financial needs of individuals, families, and companies. We are here to improve the financial health of our customers and our home countries, and to support their growth. Further information about us can be found at www.luminor.ee.

Chief Executive's Statement

In 2025 the economies of our home markets of Estonia, Latvia, and Lithuania benefitted from lower interest rates and continued growth, which generated good, broad-based demand for new lending.

We refreshed our strategy in 2025. In the next two-years we will strengthen further our position as a top 3, universal, pan-Baltic bank, with a digital-first operating model, demonstrated track record, and a modern and scalable IT platform. To realise this, between now and the end of 2027 we will focus on three areas: first, to grow our customer franchise; second, to improve the efficiency of our IT systems and digitalise our operating model; and third, to remain compliant with changing regulations.

We made clear progress implementing our strategy, growing lending to individuals and businesses, and increased our deposit balances, as we improved our product offering and increased customer NPS scores. We advanced our digitisation plans, as well, implementing essential elements of our future digital platform, modernising key IT assets, and taking back full control of IT services, which were outsourced previously. Without the costs of these necessary plans our expenses would have fallen. And, we strengthened our security and regulatory compliance processes, enhanced our cyber resilience, and focused on compliance with the Digital Operational Resilience Act.

We made clear progress implementing our strategy, with improvements already visible in our numbers; we increased lending – by 9% – and grew our deposits.

We advanced our digitisation plans, as well, and strengthened our compliance processes.

Wojciech Sass
Chief Executive

We generated a profit for the period of 157.7 million EUR as compared to 202.2 million EUR in 2024. Total operating income decreased by 95.6 million EUR due, in the main, to a decrease in Net interest income, as reference rates fell, while Total operating expenses were unchanged. We recorded a slightly higher reversal of 1.9 million EUR in Expected credit losses, supported by the positive macro environment and our recovery activities. We incurred no Bank taxes and resolution fee as compared to a cost of 33.4 million EUR, as most sector-specific taxes lapsed, while income tax expense decreased by 17.1 million EUR as Profit before tax reduced. We recorded a net interest margin of 2.71% and a cost to income ratio of 64.2%, and generated a return on equity of 8.6%, or 11.9% assuming a CET1 ratio consistent with our target of 15%.

Loans to customers increased by 956.0 million EUR to 11.5 billion EUR. An increase of 589.1 million EUR in lending to individuals, driven principally by growth in mortgage lending, was complemented by broad-based growth in loans to companies of 366.9 million EUR. We maintained the quality of our loan book. Stage 2 and 3 loans reduced by 153.6 million EUR driven in the main by improvements in portfolio quality offset, in part, by a single exposure and revision of unlikely-to-pay criteria for individuals. At year end the amount of Stage 3 loans was 231.9 million EUR, 2.0% of gross loans, or 168.5 million EUR after credit loss allowances, against which we held collateral of 212.2 million EUR.

Our liquidity and capital positions are strong. At year end our Liquidity Coverage ratio was 174.6%, MREL was 35.54% and Common Equity Tier 1 (CET1) capital ratio, including retained profit, was 20.2%, over 700 basis points above our CET1 requirements and Pillar 2 guidance of 13.13%. Our Tier 1 and Total capital ratios were boosted by our inaugural hybrid capital issue, a 150 million EUR, perpetual Additional Tier 1 note. We propose to pay, in March, a dividend of 74.0 million EUR, or 50% of the profit for the year attributable to the shareholder, as per our dividend policy.

We strengthened our governance with the appointment to the Supervisory Council of two new independent members, Karl von Rohr, as Chairman, effective 1 January 2026 in succession to Nils Melngailis, and Peter Kleinschmidt as a member of the Council and Chair of its Audit committee. The Management Board was enhanced with two new appointments to lead Retail Banking. Jonna Pechter joined as Chief Marketing Officer, and Tanel Rebane was promoted to Chief Sales Officer. Their appointments means both of our customer segments are headed by local business leaders.

The outlook for the Baltic region is positive. We look forward with confidence, despite the economic environment, because of our belief in our home markets, our refreshed strategy, and our value proposition; we are here to improve the financial health of our customers and our home countries, and to support their growth. In so doing, we will maintain our strong financial standing, exercise prudent risk management, and fulfil our wider obligations. I look forward to sharing our progress.

We are Luminor

We are the leading independent bank in the Baltics and the third-largest provider of financial services in our region. We serve the financial needs of individuals, families, and companies. We are here to improve the financial health of our customers and our home countries, and to support their growth. Our name is formed from a blend of light, (lumin) to illuminate the way forward, and nor, which reflects the Nordic roots of our founding banks.

Since re-dependence in the early 1990's, the Baltic countries have transformed from planned economies to robust democracies. All three countries are members of NATO, the European Union, and the Schengen Area, and have adopted the euro. GDP per head has more than doubled since 2000, yet remains a fraction of the EU average. Governments have pursued conservative fiscal policies and have Government debt to GDP ratios of below 40%, less than half the EU average. Principal export markets are the other EU member countries, the United States, and the United Kingdom.

The total population of the three countries, at just over 6 million, is similar to other Nordic countries such as Denmark, Finland or Norway. Like their neighbours, the Baltic countries score highly for openness and freedom. In Transparency International's 2025 Corruption Perceptions Index, all the Baltic countries were ranked in the top quartile of 181 countries globally, with an average score of 67, higher than France, Spain, or Italy, and well ahead of countries in the CEE region.

The Baltic banking market is competitive but profitable. We compete against two Swedish banks which operate across the region, together with smaller scale, local banks in each country. Lending balances in the region have grown in recent years, but low private indebtedness, including low mortgage penetration, gives room for further credit growth.

We were created in 2017 when DNB and Nordea joined their Baltic operations. We manage our business by customer segment – Retail Banking and Corporate Banking – on a pan-Baltic basis from our headquarters in Estonia and branches in Latvia and Lithuania. Deposits from customers, and customer investments, are protected by Tagatisfond, the Estonian Guarantee Fund. Our subsidiaries provide leasing, manage pension funds and offer e-commerce payments.

Retail Banking provides banking services to individuals and micro-businesses, and is responsible for our pension management companies. Corporate Banking provides banking services to legal entities and is responsible for our leasing and e-commerce payments companies. We operate only in the Baltic countries and target our services at residents of the Baltic countries, or individuals and companies with a strong connection to the Baltic countries.

We are owned, via Luminor Holding, by a consortium led by private equity funds managed by Blackstone (80.05%) and DNB Bank (19.95%). We are regulated by the European Central Bank (the ECB), have a well-developed governance structure and aspire to the highest standards of conduct. Our non-executive Supervisory Council oversees the executive Management Board. The Supervisory Council members are appointed either from amongst the nominees of the shareholders of Luminor Holding, or are independent. The executive Management Board members are a blend of local and international executives.

We organise our control framework across three lines. The first line, our two banking divisions and three support divisions – Finance, Operations, and Technology – are responsible for managing their risks according to our policies, procedures and controls. The second line is a control function comprised of our Compliance and Risk divisions which are independent of, and monitor the activities of, the first line. Internal Audit serves as the third line which assesses the effectiveness of the first two lines. We do not tolerate financial crime. To prevent, detect, and report any potential financial crime, we have a low-risk appetite, have built our compliance culture, and enhanced our risk management capabilities. We work closely with governments and supervisors and use this work to augment our systems and processes, to raise our effectiveness.

We are well placed to grow with our customers. We have a simple and straightforward business model; we are a retail and corporate bank, and our business is balanced, by customer type, by sources and uses of funds, and by country. We are easy to understand: Loans to customers' account for two-thirds of our assets; we are funded primarily with Deposits from customers; and, we are well capitalised. We will continue to support the development of Baltic capital markets, and are committed to carbon neutrality by 2050.

Our strategy

We refreshed our strategy in 2025 to realise our ambition to strengthen further our position as a top 3, universal, pan-Baltic bank by end 2027, with a digital-first operating model, demonstrated track record, and a modern and scalable IT platform. Consistent with this ambition we target generating a return on shareholder equity above 15%, assuming a Common Equity Tier 1 ratio of 15%, aligned with a cost/ income ratio below 50% in the medium term, and a 50% dividend payout ratio.

The Baltic economies and operating environment provide strong foundations on which to build: economic growth is forecast to be above the EU average over the next 3 years, with unemployment trending lower and real wages growing; and, the banking market remains under-penetrated for both individuals and corporates, when compared to the EU average, paving the way for profitable growth.

To realise our ambition, and meet our financial targets, over the next two years we will focus on three areas: first, to grow our customer franchise; second, to improve the efficiency of our IT systems and digitalise our operating model; and third, to remain compliant with changing regulations.

We have good market shares in anchor products, such as residential mortgages, and lending for larger corporates, where we will maintain our strong position. In Retail Banking, we will develop our daily banking offering to increase our number of primary bank relationships, maximise our share of current accounts, and grow fee income. We will also grow consumer lending on the back of our end-to-end digital offering. In Corporate Banking, we will capitalise on our existing platform to accelerate growth in lending to SME customers. Together these actions will increase our share of significant Baltic banking revenue pools.

We have already transformed our IT systems. Our next step is to improve the efficiency of our IT systems and digitise our operating model. Therefore, we will migrate our three existing, country-based legacy systems, operating on-premises, to a single, modern, cloud-based, pan-Baltic platform. This migration will align our IT systems with our pan-Baltic operating, legal, and regulatory model; increase automation, and hence customer satisfaction, and lower unit costs; and improve the pace of IT developments and build scalability. These enhancements will optimise customer on-boarding and service, support 'compliance by design', and intensify cybersecurity.

To remain compliant with changing regulations we will continue to develop our compliance culture, including adherence to the highest ethical and conduct standards, and so build sustainable compliance into a competitive advantage, including ESG. We believe a strong compliance culture creates trust between our stakeholders and us, and so supports a sustainable business model. Our compliance culture has four pillars: employees behave with integrity; business and control divisions work as partners; we are open and reliable with our stakeholders; and we are engaged with current requirements and anticipate new expectations. We are committed to meeting our Sustainability targets, aligned with becoming carbon neutral by 2050.

Our plans are ambitious, but I am confident we will achieve them, given our good market positions, the team we have in place, and examples of early successes. Our business model is straight-forward and our balance sheet is robust with undoubted strengths in capital and liquidity, asset quality and risk management; we are already a safe home for customers' deposits, and our loan portfolio is well diversified; and we have a unique regional presence, with strong brand recognition, and high customer satisfaction. Over the past year we have appointed new heads of our two customer segments. They, together with existing Management Board members, each of whom have a pedigree of delivering change effectively, have demonstrated already some early strategic 'wins'.

As we implement our strategy, I will provide updates on our developments. As a Management Board we are accountable for our improvements, will celebrate our successes, and be candid where we need to do better. I look forward to sharing our progress as my colleagues and I, through our home markets of Estonia, Latvia, and Lithuania, make Luminor an undoubted top 3 universal pan-Baltic bank by end 2027.

Our strategy will direct our actions over the next two years as we grow our franchise, simplify our operations, and remain compliant with changing regulations.

By the end of 2027 we intend to be the primary bank for more customers, operating more effectively, so lifting our efficiency and profitability.

Wojciech Sass
Chief Executive

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This annual report has been prepared in accordance with IFRS, as adopted by the European Union, and Estonian law. The Management Report includes our Sustainability Statement prepared in accordance with CSRD. The corporate governance report is prepared in accordance with the requirements of the Estonian Accounting Act, the European Banking Authority's Guidelines on internal governance, and with consideration to Global Reporting Initiative Standards. In this report 'Luminor', 'Luminor Bank', 'we', 'us' and 'our' refer to Luminor Bank AS together with its subsidiaries. The abbreviations '€m' and '€bn' represent millions and billions (thousands of millions) of euro, respectively; '-' indicates a zero balance, '0.0' shows a balance that rounds to zero; and words with a capitalised first letter refer to a line item in the Financial Statements. The ratios we use to measure our performance and position, including Alternative performance measures, are defined in 'Additional information.'

MANAGEMENT REPORT

Financial review

Summary income statement, €m	2024	2025
Net interest and similar income	507.7	419.8
Net fee and commission income	89.6	85.4
Net other operating income	35.5	32.0
Total operating income	632.8	537.2
Total operating expenses	-345.0	-345.0
Profit before credit losses, bank taxes, and tax	287.8	192.2
Expected credit losses	1.3	1.9
Bank taxes and resolution fee	-33.4	0.0
Profit before tax	255.7	194.1
Income tax expense	-53.5	-36.4
Profit for the period	202.2	157.7

In the commentary below we compare the result for the year to the prior year

We generated a profit of 157.7 million EUR as compared to 202.2 million EUR. A decrease of 95.6 million EUR in Total operating income, due mainly to a decrease in Net interest income, and unchanged Total operating expenses, was offset in part by an increased reversal of Expected credit losses, the elimination of Bank taxes and resolution fee, and lower Income tax expense, which resulted in a 44.5 million EUR, or 22.0% decrease in Profit for the period. We generated a return on equity of 8.6%.

Total operating income of 537.2 million EUR decreased 15.1%. Net interest income decreased by 87.9 million EUR, or 17.3%, driven, chiefly, by reduced deposit margins as reference rates fell. In addition, lending spreads decreased due to competitive pressures on new lending and changes in mortgage refinancing regulations which resulted in increasing demand for repricing of existing loans. The impact of these effects was offset in part by growth in lending balances and supported by a decrease in overall funding expenses including a reduction in the amount of covered bonds in issue for half of the year. We generated a net interest margin of 2.71%, as compared to 3.33%. Net fee and commission income decreased by 4.2 million EUR, or 4.7%, as a Pension performance fee generated last year did not recur. Net other operating income decreased by 3.5 million EUR, or 9.9%, driven, in the main, by lower Net gain from financial items, as a legacy bond portfolio managed by Treasury, designated at fair value, reduced in size and income from foreign exchange transactions decreased.

Total operating expenses of 345.0 million EUR were unchanged. An increase in Personnel expenses of 6.2 million EUR, or 4.2%, as we insourced critical functions, was more than offset by a reduction of 8.8 million EUR, or 5.0%, in Other administration expenses as we lowered Consultancy and professional services spending by 6.6 million EUR and IT-related expense by 1.3 million EUR. Depreciation, amortisation, and impairment expense decreased by 1.1 million EUR, or 5.4%, as we wrote down 9.7 million EUR of goodwill associated with the purchase of Maksekeskus as compared to a write-down of 11.1 million EUR, and Loss on derecognition of non-financial assets increased by 3.7 million EUR, as we realised a higher loss on derecognition of capitalised software costs. Reflecting the movements above, the cost/ income ratio increased by 9.7%-points to 64.2%.

We recorded a reversal of 1.9 million EUR in Expected credit losses as compared to a reversal of 1.3 million EUR. The reversals were driven mostly by the positive macro environment that has contributed to low level of new defaults. In addition, successful restructuring and recovery activities led to reversals of previously established loan loss provisions. We incurred no Bank taxes and resolution fee in 2025 as compared to a cost of 33.4 million EUR, as most sector-specific taxes lapsed and we mitigated the effect of the second Latvian bank tax as we grew our customer balances. Income tax expense of 36.4 million EUR, an effective tax rate of 18.6%, as compared to 20.9%, decreased by 17.1 million EUR, or nearly a third, as Profit before tax reduced and due to changes in deferred tax assets and liabilities. Profit attributable to our shareholder was 147.9 million EUR as compared to 202.2 million EUR.

Summary balance sheet	31 Dec	31 Dec
€m	2024	2025
Cash and balances with central banks	3,106.3	1,937.6
Debt securities	1,670.2	2,092.3
Loans to customers	10,535.4	11,491.4
Other assets	411.8	380.7
Total assets	15,723.7	15,902.0
Deposits from customers	11,352.7	11,510.7
Debt securities issued	2,238.0	2,165.5
Other liabilities	446.6	340.8
Equity	1,686.4	1,885.0
Total liabilities and equity	15,723.7	15,902.0
Liquidity Coverage ratio, %	205.1	174.6
Net Stable Funding ratio, %	143.6	134.1

In the commentaries below we compare the year-end balance sheet to the balance sheet at the end of the prior year

In 2025 we increased Loans to customers by 956.0 million EUR and grew Deposits from customers by 158.0 million EUR. The total balance sheet increased by 178.3 million EUR to 15.9 billion EUR, as increased lending was offset by a decrease of 1,168.7 million EUR in Cash and balances with central banks while Debt securities increased by 422.1 million EUR. Loans to customers accounted for over seventy percent of total assets, funded wholly by deposits.

Loans to customers increased by 9.1% to 11.5 billion EUR. An increase of 589.1 million EUR in lending to individuals, driven principally by growth in mortgage loans, was complemented by growth in loans to businesses of 264.3 million EUR driven by broad-based growth in lending including to the Utilities, Real Estate, and Wholesale & retail sectors, offset in part by a reduction in lending to Construction, and Other, sectors. Loans to Financial institutions grew by 20.6 million EUR and loans to the Public sector by 82.0 million EUR.

Cash and balances with central banks decreased by over a third and Debt securities increased by a quarter as we reshaped our excess resources. Our liquidity portfolio consists, in the main, of high-quality government and covered bonds which can be pledged with the European Central Bank to allow us to obtain additional liquidity.

Deposits from customers increased by 1.4% as we balanced our liabilities and adjusted our deposit rates selectively. An increase in deposit balances from Individuals, Financial institutions, and Public sector customers was offset in part by a managed decrease in deposits from Businesses. Demand deposits decreased by 105.2 million EUR while Term deposits increased by 263.2 million EUR. At year end, Term deposits accounted for a quarter of Deposits from customers. Debt securities issued decreased by 72.5 million EUR as we lowered the amount of senior bonds issued.

Equity increased by 198.6 million EUR as we issued our inaugural Additional Tier I security in 2025, a 150 million EUR perpetual obligation, and retained the Profit for the period. These additions were offset by payment of a 101.1 million EUR dividend for 2024.

Our own funds and MREL-eligible instruments totalled 35.54% of Total Risk Exposure Amount (TREA) and 16.82% of our Leverage Ratio Exposure (LRE). With effect from 1 January 2026 our MREL targets were confirmed at 23.69% of TREA plus combined buffer requirement, down from 23.77% previously, and 5.91% of LRE.

Our Liquidity Coverage ratio decreased by 30.5%-points to 174.6% as we increased Loans to customers and paid a dividend for 2024. Our Net Stable Funding ratio was 134.1%, a decrease of 9.5%-points. Available stable funding increased, driven by issuance of our AT1 security and by a higher amount of Debt securities issued with remaining maturities greater than one year. Required stable funding also increased, driven in the main by the increase in Loans to customers. Both ratios remained well above the 100% minima.

Capital resources and uses Management view, €m	31 Dec 2024	31 Dec 2025
Shareholder's equity	1,686.4	1,737.4
Foreseeable dividends	-101.1	-74.0
Common Equity Tier 1, before regulatory adjustments	1,585.3	1,663.4
Regulatory adjustments	-62.0	-65.6
Prudential filters	-0.3	-0.2
Common Equity Tier 1	1,523.0	1,597.6
Additional Tier 1 capital	-	147.7
Tier 1 capital	1,523.0	1,745.3
Subordinated debt	199.1	199.5
Total capital	1,722.1	1,944.8
Credit risk exposure amounts	6,474.3	7,105.8
Operational risk exposure amounts	1,068.5	779.1
Other risk exposure amounts	31.9	14.6
Risk exposure amounts	7,574.7	7,899.5
Common Equity Tier 1 ratio, %	20.1	20.2
Tier 1 ratio, %	20.1	22.1
Total capital ratio, %	22.7	24.6
Leverage ratio exposure amounts	16,294.2	16,687.5
Leverage ratio, %	9.1	10.0

We are strongly capitalised, with own funds at 31 December of over 1.9 billion EUR. Measured on our 'Management view', which includes profit for the period which we will retain, our Common Equity Tier 1 (CET1), Tier 1, and Total capital ratios were above 20.0% at year end. As reported on a regulatory basis, pending ECB approval of year end audited profits, the ratios were 19.2%, 21.0%, and 23.6%, respectively. Our target CET1 capital ratio is 15.0%.

We have initiated the final part of our capital efficiency programme, to return excess equity capital to our shareholder – subject to regulatory approval. Furthermore, we will maintain the efficiency of our capital resources, maximising the amount of issued capital consistent with our capital requirements. In the meantime, we continue to assess the opportunity to issue senior non-preferred debt as we anticipate possible changes in deposit preference regulations to maintain our current A2 rating.

Our CET1 ratio increased by 0.1%-points, with similar rates of growth in both Equity capital and Risk exposure amounts. Our Tier 1 and Total capital ratios increased by 2.0%-points and by 1.9%-points respectively, after we issued our inaugural Additional Tier 1 capital security, a 150 million EUR, perpetual subordinated note, resettable six and a half years after issuance. The security was issued to Luminor Holding, our parent company, which, in turn, sold a similar security, rated Ba2 by Moody's, to investors.

Risk exposure amounts increased by 324.8 million EUR, or 4.3%. Credit risk exposure amounts, which we measure on a standardised basis, grew 631.5 million EUR, or 9.8%, as we increased Loans to customers, and completed a year-long, in-depth review of our credit risk exposure calculation methodologies and processes, offset in part by our adoption of the requirements of Basel IV in January 2025. The same requirements drove a reduction of 289.4 million EUR, or just over a quarter, in Operational risk exposure amounts, as per the standardised measurement approach, while Other risk exposure amounts decreased by 17.3 million, or over half, driven, in the main, by decreased market risk exposure as we revised our calculation methodology.

Our capital ratios remain well above our minima which, at 31 December 2025, require us to have a CET1 ratio exceeding 11.63%, a Tier 1 ratio above 13.60% and a Total Capital ratio greater than 16.23%. Since June 2025 these minima include an additional countercyclical buffer of 0.5% of our risk exposures in Latvia, which increased the minimum capital amount by 14 basis points. Our capital targets and internal limits are set at the regulatory expectation (including Pillar 2 Guidance of 1.5%) plus a Management Buffer. Our leverage ratio increased by 0.9%-points as Tier 1 capital grew by more than Leverage ratio exposure amounts, as compared to the required minimum ratio of 3.0%.

Asset quality of Loans to customers €m	31 Dec 2024	31 Dec 2025
Stage 1	9,526.5	10,636.4
Stage 2	927.2	729.0
Stage 3	187.3	231.9
Gross carrying amount (a)	10,641.0	11,597.3
Credit loss allowances	-105.6	-105.9
Total	10,535.4	11,491.4
Non-performing loans ratio, %	1.8	2.0
a. Stages 2 and 3 include POCI loans		

At year end Loans to customers totalled 11.5 billion EUR, an increase of 9.1% compared to the end of 2024. The Gross carrying amount of loans was 11.6 billion EUR, of which 91.7% were classified as Stage 1. We maintained the quality of our loan portfolio – both to individuals and companies. During 2025 the Gross carrying amount of Stage 2 and 3 loans decreased by 153.6 million EUR.

Our exposure to the Commercial Real Estate sector totalled 1.5 billion EUR. Our CRE portfolio is well-diversified by sub-sector, with around one third of the portfolio to the retail sector and around 30% to offices, with several other sectors accounting for the remainder. We have limited exposure to development risks, with only around 10% of the CRE portfolio in the development stage. The portfolio has an average loan-to-value ratio of 47%.

The Wholesale and retail, and Manufacturing, sectors are our second and third largest business sectors by lending to businesses. Both sectors are well diversified among different sub-sectors. We have no direct exposure to companies domiciled in Russia, Belarus or Ukraine. Our exposure to residents of these countries, mostly residential mortgages all of which are secured on Baltic properties, is just 1.0 million EUR.

The quality of mortgage loans, of which 95.7% are classified as Stage 1, 3.2% as Stage 2 and only 1.1% as Stage 3, remains good. The Gross carrying amount of Consumer loans and cards to private individuals totalled 153.3 million EUR, or approximately 1% of total Loans to customers, of which 1.2 million EUR were classified as Stage 3.

The gross amount of Stage 2 loans decreased by 198.2 million EUR, or 2.4%-points, to 6.3% of gross lending at year end, primarily driven by portfolio quality improvements and repayments.

The gross amount of Stage 3 loans increased by 44.6 million EUR to 231.9 million EUR or 2.0% of gross lending at year end. For private individuals, Stage 3 loans increased by 14.7 million EUR, while for companies increased by 29.9 million EUR. The increase for companies was driven by a large single exposure, while for private individuals the increase was driven by a more stringent identification of unlikely-to-pay criteria. The inflow of non-performing loans, most of which was to companies, was around 1.5 times higher than the outflow. Around 60% of the outflow was from companies and around 40% from private individuals, with repayments accounting for over 60% of the outflow.

Details of the reversal of Expected credit losses for the year of 1.9 million EUR can be found in the analysis of our income statement section, above.

The Baltic economies are performing well. As a result, our portfolio is showing healthy growth, and despite a minor increase in Stage 3 loans, our portfolio continues to perform well in all business segments.

Diego Biondo
Chief Risk Officer

Stage 3 Loans, €m	31 Dec 25
Gross carrying amount	231.9
Credit loss allowances	-63.4
Total	168.5
Collateral fair value	212.2

Alternative performance measures

%	2024	2025
Return on Equity, assuming a CET1 ratio of 15%	16.1	11.9
Measured on an actual basis		
Return on Equity	11.7	8.6
Cost/ income ratio	54.5	64.2
Cost of risk	0.01	0.01
Non-performing loans ratio, period end	1.8	2.0
Net interest margin	3.33	2.71
Average spread for Loans to customers	2.67	2.52
Average spread for Deposits from customers	2.06	1.24
Combined weighted total average spread, loans and deposits	2.35	1.86
Common Equity Tier 1, including profit to be retained, ratio	20.1	20.2
Reference money market rate used in the above - Average 3m Euribor	3.572	2.177

For definitions of our Alternative performance measures, see section 'Additional information', below. We describe our APMs, provide formulae, and show calculations, in 'Luminor Bank, Alternative Performance Measures, 4Q25', available at www.luminor.ee.

Customer segments

Retail Banking, €m	2024	2025
Net interest and similar income	272.3	216.7
Net fee and commission income	63.2	59.1
Net other operating income	5.6	4.5
Total operating income	341.1	280.3
Total operating expenses	-216.6	-223.6
Profit before credit losses and tax	124.5	56.7
Expected credit losses	13.9	7.2
Profit before tax	138.4	63.9
Tax expense	-28.9	-12.0
Profit after tax	109.5	51.9
Cost/ income ratio, %	63.5	79.8
Allocated capital	414.4	410.3
Return on Allocated Capital, %	26.4	12.6
Customer balances	31 Dec	31 Dec
€m	2024	2025
Loans to customers	5,900.1	6,477.9
Deposits from customers	6,119.2	6,320.5

We grew our customer balances and improved our customer net promoter scores in 2025 as compared to the prior year. Mortgage lending activity grew in 2025. New sales volumes increased steadily, supported initially by changes in refinancing laws in Latvia and Lithuania, and then by demand remaining solid subsequently – with new records being set in both the third and fourth quarters.

As part of our commitment for sustainable and energy-efficient living, we continued to promote energy-efficient buildings in Estonia and Latvia by offering attractive financing terms for properties with Energy Performance Certificates of A or higher. Supported by our offering, demand from customers in energy-efficient homes remained high throughout the year.

Demand from customers for consumer lending also increased during the year. Activity increased significantly in the second half of the year as we improved our offering, particularly in Latvia, where a new digital customer experience and underwriting process allowed customers to apply for and receive funds quickly. This offering was expanded to Lithuania in the fourth quarter. As a result, new lending volumes rose by more than 40% compared to the previous year.

Total deposits grew by more than 3%, supported by growth in new customer numbers and by an overall increase in the number of active customers. New customer numbers increased by almost 40% compared to a year earlier, with onboarding activity accelerating especially during the second half of the year because of our marketing activities. Our active customer base also increased during the year by 1%.

We continued to improve our customer experience throughout the year. We introduced a new sustainable design for our flagship Luminor Black VISA card that uses 95% recycled plastic and so cuts carbon emissions by 8.7 tonnes a year.. We added additional card benefits during the year, including additional purchase insurance and extending injury coverage to holders' family members. We introduced the latter in Latvia initially and will extend coverage to Estonia and Lithuania in the first quarter of 2026.

In 2025 we did more for our customers. We grew mortgage lending once again, increased consumer lending, and attracted more deposits.

Jonna Pechter
Tanel Rebane
Heads of Retail Banking

Corporate Banking, €m	2024	2025
Net interest and similar income	220.4	179.7
Net fee and commission income	26.1	26.5
Net other operating income	10.0	13.4
Total operating income	256.5	219.6
Total operating expenses	-121.6	-114.1
Profit before credit losses and tax	134.9	105.5
Expected credit losses	-13.5	-7.0
Profit before tax	121.4	98.5
Tax expense	-25.4	-18.5
Profit after tax	96.0	80.0
Cost/ income ratio, %	47.4	52.0
Allocated capital	701.6	696.5
Return on Allocated Capital, %	13.7	11.5
Customer balances	31 Dec	31 Dec
€m	2024	2025
Loans to customers	4,632.2	5,013.5
Deposits from customers	5,196.9	5,156.9

We saw positive customer sentiment throughout the year, with steady growth in demand for new credit.

The fall in reference interest rates at the beginning of the year strengthened customer confidence, especially among small and medium-sized enterprises that were considering new investment. This confidence then remained as the year progressed, with quarter-on-quarter growth in loan balances from March onwards. Demand for financing was broad-based, with growing interest across sectors such as Real estate, Wholesale and retail, and Transport and storage, and renewable energy.

Customer confidence strengthened in 2025 which led to wide-spread demand for new financing.

Jonas Urbonas
Head of Corporate Banking

Leasing activity remained strong as well and was supported by ongoing investment by our customers in fleet renewal and efficiency improvements as they looked to maintain their long-term competitiveness. Favourable financing conditions and the recovery of the transport sector also contributed positively to growth in the portfolio.

Deposits increased in the first and second quarters and grew again in the fourth quarter, reflecting improved liquidity management by clients and sustained trust in our offering. A seasonal decrease in the third quarter was driven mainly by dividend payments, spending on investment, and more intense competition in the market.

We expanded our product offering to meet the evolving needs of customers. We introduced renovation loans in Estonia to help housing associations modernise buildings and improve energy efficiency. We launched revenue-based financing in all three countries to provide a flexible option for small and medium-sized merchants seeking funding for growth linked to their sales. We extended our cooperation with the European Investment Bank to allow SMEs to access financing at reduced interest rates and enhanced our leasing services for private individuals by launching a faster, more convenient self-service solution.

We lead-managed a range of securities across sectors. We were appointed sole arranger and distributor for the inaugural defence bond issued by Valstybės investicinis kapitalas (VIK, the Lithuanian state-owned investor), and co-lead manager for the Republic of Lithuania's 1.75 billion EUR dual-tranche bond. We also lead managed the largest ever corporate bond from a Latvian borrower, a 400 million EUR Green Bond issued by one of the leading green energy producers in the Baltic region, a 70 million EUR bond issued by a development financial institution, as well as a series of securities issued by real estate companies.

Supplementary information

ECONOMIC ENVIRONMENT

Macroeconomic data	Public Debt /GDP	Economic growth (GDP) (a)		Inflation (CPI) (a)		Unemployment rate		Wage growth (a)	
%	25Q3	2024	25Q3	2024	2025	2024	25Q3	2024	25Q3
Estonia	22.9	-0.1	0.9	3.5	4.8	7.6	7.1	8.1	5.7
Latvia	45.2	-0.4	1.8	1.3	3.7	6.9	6.9	9.7	7.9
Lithuania	40.7	2.7	2.1	0.9	3.8	7.1	6.6	10.2	8.5

a. Year-on-year change, Data as at 27 January 2026

The economy of the European Union continued to grow through 2025, albeit at an uneven pace across countries and sectors, with Spain the powerhouse for growth while Germany underperformed. The economies of the Nordic countries did better than in the prior year, with expansion in Sweden offsetting lower growth in Finland, where weaknesses in the real estate and construction sectors were observed. Money market interest rates declined and stabilised slightly above 2%. Lower interest rates supported the improved performance of the Baltic economies directly as interest on most household mortgages and business loans is set at a spread to short-term money market rates. Growth prospects for the year 2026 remain stable, aided by diminished perceptions of geopolitical risks.

Economic growth converged across the Baltic states as compared to the prior year, with Estonia and Latvia returning to growth alongside Lithuania. Expansion of the Estonian economy was aided by energy and manufacturing sectors, though the relatively weak Nordic real estate and construction markets continues to have a negative impact, while Latvian numbers being boosted by strong manufacturing and export sectors, and Lithuania benefitted from close relationships with the strongly growing Polish economy.

Inflation rates remained above the euro area levels in all Baltic states. Estonian inflation was higher because of increase in the value added tax from 22% to 24% in July 2025, introduction of car tax and several other administrative measures leading to price level increases. The inflation rates in Latvia (3.7%) and Lithuania (3.8%) show the wage pressure coming from real wage growth following the previous decrease in real wages and strong domestic demand. Food prices were increased inflation while the strong euro and cheap Chinese imports provided a countervailing push downwards in prices.

Unemployment rates remained somewhat elevated compared to European levels as the statistics reflect higher unemployment rates following inclusion of refugees from the war in Ukraine. That said, employment levels remain very close to historic peak levels. Wages continue to increase. Nominal wages continued to grow, with growth of around 8% in both Latvia and Lithuania in the third quarter of 2025. Estonian wage growth slowed to 5.7%, but with the increase of the personal income tax in 2024 and elevated inflation rates, real wages fell. Latvian and Lithuanian purchasing power of wages now exceeds clearly the previous peak level of 2021 as wage growth has exceeded inflation for some time.

Governments in all the Baltic states run budget deficits and are offering support to their respective economies. With the debt-to-GDP ratios among the lowest in the European Union, there is ample room to provide additional support to the economies whenever necessary. Deficits have had limited effects on the debt-to-GDP ratios as nominal GDP has been growing fast. The outlook for all the Baltic countries remains optimistic for 2026 with incomes increasing, stable interest rates at prevailing lower levels, and continued expansion of the European Union economy.

BUSINESS DEVELOPMENTS

We refreshed our strategy, as per 'Our strategy' section, above. In summary, we intend to strengthen further our position as a top 3, universal, pan-Baltic bank by end of 2027, with a digital-first operating model, demonstrated track record, and a modern and scalable IT platform. To realise our ambition, we are focused on three areas: first, to grow our customer franchise; second, to improve the efficiency of our IT systems and digitalise our operating model; and third, to remain compliant with changing regulations.

Through the year we continued to improve the experience of our customers banking with us, and are taking steps to accelerate these enhancements further in the period ahead. We strengthened our security and regulatory compliance processes and systems and, as well, maintained our focus on compliance with the Digital Operational Resilience Act.

To support the growth and development of medium-sized companies in the Baltic region, assets managed by our pension fund management subsidiaries committed to invest over 25.0 million EUR in a new private equity and debt funds, which will invest majority of its assets in the region.

We made several changes to the Supervisory Council and its committees. Karl von Rohr was appointed Chairman of the Council effective 1 January 2026 succeeding Nils Melngailis. Karl brings three decades of international banking experience gained at Deutsche Bank, where he served as a member of the Management Board, President of the Management Board and Chief Executive of Deutsche Bank's Private Bank, and Chairman of the Supervisory Board of DWS Group. Nils will remain a member of the Council and was appointed, for 2026, Senior Advisor.

Peter Kleinschmidt was appointed as member of the Council. He is a former Partner at PwC and has three decades experience in financial services, governance, and compliance, with expertise in auditing, risk management, and digital transformation. Since 2023, Peter has focused on investment and advisory roles. From 2024 until March 2026, he was a member of the supervisory board and the Chairman of the Risk & Audit committee of N26, the German neobank. Peter is Chairman of the Council's Audit committee, and a member of the Risk committee. The appointments, above, are subject to regulatory approval.

Maria Elena Cappello, Mathias Favetto, and Betsy Nelson were re-elected as members of the Council for new terms of five years each. Sandy Kinney Pritchard stepped down from the Council and its Audit and Risk committees, after which Bjoern Erik Naess chaired the Audit committee on an interim basis before the appointment of Peter Kleinschmidt.

The Management Board was strengthened with two new appointments to lead Retail Banking. Jonna Pechter joined as Chief Marketing Officer, with responsibility for retail products, marketing, and branding, and Tanel Rebane was appointed as Chief Sales Officer, accountable for retail sales, customer service touchpoints, private banking, and our pension subsidiaries. Jonna has over two decades of experience in retail banking and product management in the Baltic counties, especially Estonia while Tanel has worked for us since 2020 leading customer relations, sales, and innovation. Together they are accountable for improving the performance of Retail banking. Following these appointments, we reorganised the operations of Retail banking.

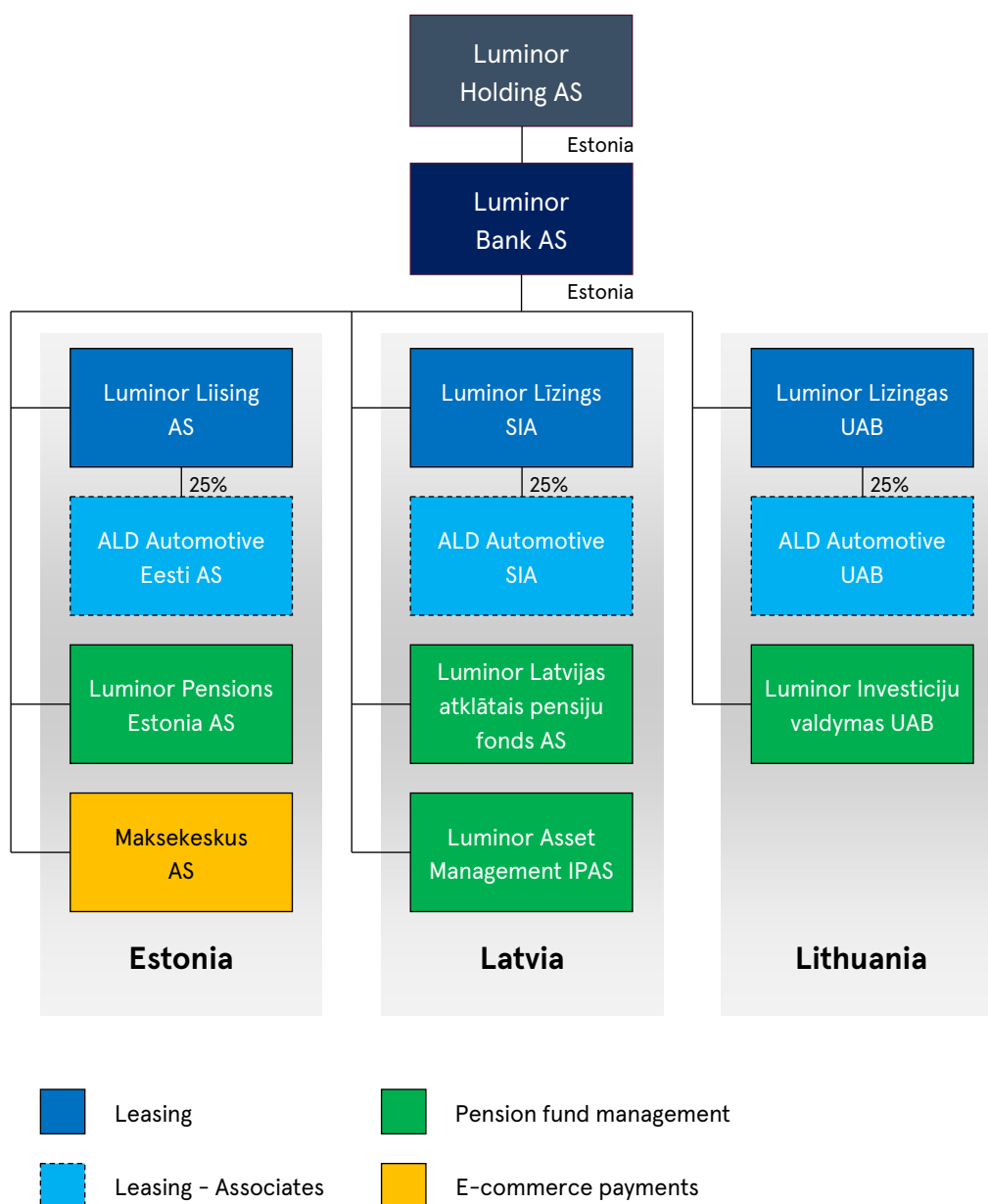
We simplified the structure of our IT organisation, and embedded an engineering first, distributed way of working that supports better our focus on customers and business development. We also prepared implementation of key deliverables of the Instant Payments Act. We insourced critical functions and terminated our outsourcing contract with Kyndryl. In addition, we launched the Verification of Payee service to help make instant payments safer and reduce the risk of fraud and misdirected payments.

We completed the purchase of the outstanding minority interest in Maksekeskus, our e-commerce payments subsidiary, recorded a small gain on sale as we sold the shares we owned in our Associate, Kredītinformācijas birojs AS, and completed the liquidation of SIA Promano Lat, our subsidiary.

We continued to work closely with our regulators. Finantsinspekcijai issued a precept in September about customer notifications and internal procedures for terminating or refusing basic payment service agreements. We adjusted our procedures to align them with the supervisor's observations.

ORGANISATION STRUCTURE

We operate principally through Luminor Bank AS, registered and headquartered in Estonia, with branches in Latvia and Lithuania. Through subsidiaries we provide leasing, manage pension funds, and offer e-commerce payments. We own 100% of all subsidiaries. In Note 12, 'Investments in associates and subsidiaries', below, we list, as well, subsidiaries being liquidated. We have omitted such subsidiaries from the structure chart immediately below.



PREVENTING FINANCIAL CRIME

We do not tolerate financial crime, and we remain committed to maintaining our strong conduct, ethics, and risk culture. We market our products and services only to residents of the Baltic countries, and to individuals and companies with a strong connection to those countries.

Our commitment to protecting our customers and preserving the integrity of the financial system remains at the heart of our actions. We work closely with regulatory and supervisory authorities and use this work to enhance our systems and processes. We are committed to following all laws and regulations, standards, guidelines, and recommendations.

We continued to improve our organisational setup, governance, and processes throughout the year to ensure that our activities are aligned with our risk appetite and our risk-based approach, while keeping a clear focus on the experience for our customers. We consolidated our efforts to prevent financial crime and strengthened the operational structures supporting them.

We remain committed to the protection of human rights and to countering the financing of terrorism and the proliferation of weapons of mass destruction. We report possible sanctions breaches and violations to the regulatory authorities.

We advanced our anti-money laundering (AML) capabilities, sanctions compliance measures, and anti-fraud framework through ongoing development and iterative deliveries. We continued to prioritise and enhance our risk management measures for tackling fraud. These efforts included continuous technological upgrades, the application of risk mitigation strategies, and regular training for our staff so they can address fraudulent activities more effectively. Our focus during the whole year remained on strengthening both the efficiency and the effectiveness of our fraud prevention framework.

Over the year we continued to enhance our risk culture and carried out a range of awareness-raising activities. We organised 63 training courses on compliance risk for a total of over 30,000 hours during the year. We ran several internal communication and engagement projects to promote discussion and a common understanding around different aspects of risk culture, we introduced a user-friendly Code of Conduct Employee Guide, and we organised a dedicated Conduct Month.

We took proactive steps to make our customers more aware about fraud. We ran communication initiatives throughout the year to empower customers and the wider public with the knowledge and skills they need to recognise possible attempts at fraud in a climate where criminal activity is always evolving fast.

We remain dedicated to staying at the forefront of technological advances and to refining our risk management measures for fraud risk to adapt to emerging threats and ensure the continued security of the financial assets of our customers.

EVENTS AFTER PERIOD END

On 27 January 2026 we announced the redemption of our 500 million SEK floating rate senior notes, due March 2027. The notes will be redeemed on 27 March 2026, the optional redemption date, at 100% of their nominal amount, together with accrued but unpaid interest. The listing of the notes on the Irish Stock Exchange will be cancelled thereafter.

CONSOLIDATED SUSTAINABILITY STATEMENT

Sustainability at a glance

OUR PRIORITIES

1. Committed to sustainable growth using ESG targets
2. Contribute positively to our home markets of Estonia, Latvia, and Lithuania
3. Become climate neutral by 2050, building capabilities to decarbonise our business

OUR PROGRESS AND TARGETS

1. Delivered results against climate risk targets
2. Strengthened ESG risk governance
3. Enhanced our Climate and Environmental Transition Plan and so align with EBA Guidelines on ESG risk management

No	Target	Measure	2024	2025
1	Committed to Paris Agreement alignment, tCO ₂ e (own operating emissions)	Net '0' by 2050	2,570.7	2,239.9
2	tCO ₂ e operational emissions per FTE vs. 2021 (a)	0.72 by 2025	0.87	0.68
3	New lending volume in high climate risk sectors to clients that have transition plans in place, % (b)	90% by 2025	81.3	75.2
4	Mortgage portfolio with EPC rating A or better, % of total mortgage exposure	30% by 2027	28.9	32.8
5	Volume of new lending to sustainable real estate and renewable energy related projects (accumulated), €m (c)	€228m by 2027 €700m by 2030	182.4	305.4
6	Volume of green or sustainability-linked Covered bonds and Corporate Senior bonds in our bond portfolio, %	50% by 2030	3.2	7.4
7	Renewable energy consumption and/or production target, %	100% of electricity by end 2025	70.8	76.2
8	Improve customer satisfaction and increase retail transactional NPS score	+50 in 2025	+55	+56
9	Maintain low ESG Risk Rating by Sustainalytics	Low risk, bi-annual as of 2023	-	18.4

- a. The metrics represent the target established in 2021. The presented target and the reported metrics for 2024 and 2025 do not contain emission categories, that were included in the updated emission baseline in 2024 (IT equipment and employee stay in hotels during business trips) as well as category 15 emissions.
- b. In scope are customer groups with exposures above 5 million EUR, excluding off balance items. We had considered that customers fulfilled their requirement for transition plans submission if they had prepared a sustainability statement disclosing the existence of plans, appropriate activities and KPIs. In case customers have not prepared a sustainability statement but have submitted information indicating activities helping to transition to more sustainable practices we treated them as compliant to the requirement to have transition plans. We have established transition plan guidelines for our customers outlining requirements which would meet our general requirements for transition planning documentation.
- c. The loans reported cover development of renewable energy projects and real estate construction, acquisition and renovation projects that comply with the technical screening criteria for the primary energy demand of buildings under the Climate Delegated Act or are granted one of the following or higher international certificates: LEED (Gold), BREEAM (Very Good), EDGE (Standard), Passive House (Standard), DGNB (Silver) or other equivalent sector-specific or local certificate. We reached our 2027 target in 2025. Henceforth we will report our progress versus our 2030 target only.

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GENERAL INFORMATION

We have prepared this sustainability statement in accordance with the Corporate Sustainability Reporting Directive (CSRD) as transposed into Estonian law, and the European Sustainability Reporting Standards (ESRS). This statement is based on the Double Materiality Assessment (DMA) of potentially material ESG matters, and the resulting definition of the related impacts, risks and opportunities of the material topics, and has sections aligned with ESRS guidelines; General, Environmental, Social and Governance information. The scope of the consolidation is the same as for our financial statement.

In addition, we include non-CSRD mandated metrics relevant to our strategy. See Note 5, CSRD content index, Note 6, Datapoints that derive from other EU legislation, and Note 7, Datapoints from other legislation or sustainability standards, below.

Many of the climate-related quantitative disclosures for our portfolio that are covered in this sustainability statement are compiled on a best effort basis and are based on proxy methodologies to some extent. These include the reported Scope 1, 2 and 3 emissions and EPC reports. The main sources of estimation and the outcome uncertainty for the metrics disclosed are provided in the sections 'Environmental information' and 'Notes to the sustainability statement'. The two main sources of measurement uncertainty arise because of our use of industry, not company specific, data and proxy data, based on building type, location, and year of construction.

Our DMA process, which includes our suppliers and customers, identifies the concerns of stakeholders, informs our decision-making and guides our disclosures. For our 2025 Assessment we updated our methodology, garnered the views of our stakeholders and reviewed publications. From these we concluded impacts, risks, and opportunities over the three-time horizons consistent with regulatory requirements and the financial sector practice. We made four principal changes to this year's assessment as compared to the prior year, as per section 'Changes' below.

We have not omitted any specific piece of information corresponding to intellectual property, know-how or the results of innovation, nor have we used the exemption from disclosing impending developments or matters that are under negotiation. No exemption has been applied, except for sensitive matters which are indicated in Context index. We have not used any external body other than the assurance provider to evaluate the metrics in the Sustainability Statement.

To support our DMA, we engaged with stakeholders using surveys, focus groups, and analysis of publicly available disclosures. While indirect data sources such as annual reports provided valuable insights, we acknowledge that metrics derived from these sources carry inherent limitations in accuracy due to subjectivity, representativeness, and standardisation challenges. Nonetheless, these inputs enabled us to identify and validate key Impacts, Risks and Opportunities (IRO) and enhance the reliability of our ESG risk metrics across the value chain. To improve the accuracy of value chain metrics derived from indirect sources, we plan to expand supplier and customer engagement through standardised surveys and internal scenario-based assessments aligned with evolving science and our updated Climate and Environment Transition Plan. In addition, to reduce our dependency on metrics derived from indirect sources we plan to increase the share of customer reported data.

Material Sustainability Matters (and the reference to the ESRS standard based on which the related disclosures are specified) and the location of the related IROs.

Material topic (and ESRS standard)	Subtopics	Where to read more
1. Climate change (E1)	Climate change adaptation, Climate change mitigation	Environmental information, Climate change and air pollution
2. Biodiversity and ecosystems (E4)	Direct impact drivers of biodiversity loss, Direct exploitation	Environmental information, Climate change and air pollution
3. Consumers and end users (S4)	Product responsibility and accessibility	Social information, Customers and end users

The CSRD content index, is located in Note 5 of the 'Notes to the sustainability statement'. Additionally, a table detailing the datapoints derived from other EU legislation and their location within the sustainability statement is provided in Section 6 of the Notes to the sustainability statement.

Change in presentation

In 2025 we revised our calculation methodology for financed emissions to raise the accuracy of our disclosure and ensure closer alignment with Partnership for Carbon Accounting Financials (PCAF) standards, by employing better data, corrected attribution factors, and omitting out of scope assets. Our changes impacted individual asset classes and aggregated indicators as reported previously for 2024.

	As reported previously	Change	As restated
Financed Emissions			
Mortgage lending, tCO ₂ e	234,003	+7,559	241,562
Corporate lending, tCO ₂ e	2,422,370	+162,313	2,584,683
Motor vehicle leasing, tCO ₂ e	74,469	+14	74,483
Carbon intensity of the corporate lending portfolio, tCO ₂ e/€m	705.5	-7.3	698.2
Listed equity and corporate bonds, tCO ₂ e	106,881	+6,320	113,201
Sovereign debt, tCO ₂ e	198,200	-12,622	185,578
Total GHG emissions			
Scope 3 GHG emissions – Investments, tCO ₂ e	3,035,923	+163,584	3,199,507
Total GHG emissions, location-based, tCO ₂ e	3,040,001	+163,584	3,203,585
Total GHG emissions, market-based, tCO ₂ e	3,038,494	+163,584	3,202,078
GHG emissions intensity, location-based, total GHG emissions per net revenue	4,806	+256	5,062
GHG emissions intensity, market-based, total GHG emissions per net revenue	4,803	+257	5,060
Net revenue, €m	632.6	+0.2	632.8

Double Materiality Assessment and Sustainability Reporting Processes

Our annual Double Materiality Assessment (DMA) identifies the concerns of stakeholders, informs our decision-making and guides our disclosures.

In 2025, we completed our fifth DMA based on an updated methodology leading to a more focused set of material topics, which affirmed Climate change, Biodiversity and ecosystem, and Consumers and end-users as material topics while excluding other topics that no longer meet the revised disclosure criteria. Topics that were considered material in the previous reporting period but are no longer classified as such under the 2025 DMA have been excluded from this year's reporting scope.

Our governance framework ensures compliance with applicable laws and regulations through policies, mandatory training, and channels for whistleblowing and speak-up. These measures safeguard trust and accountability across our operations. In addition, for topics that are no longer material, we have reviewed the targets, plans, and progress disclosed in our previous sustainability report and provided updates in the relevant chapters of the statement, under 'Progress and updates since last report' sections to maintain transparency and continuity.

Our DMA identifies adverse impacts using an impact-based assessment aligned with ESRS and assesses sustainability-related risks and opportunities separately using ESRS financial materiality criteria. In 2025, we prioritised activities and relationships in high-risk sectors – such as agriculture, energy, and manufacturing – based on portfolio exposure and external benchmarks. In our assessment, we focused on Baltic countries for environmental and social risks, and business relationships with suppliers and customers whose ESG practices may pose reputational or operational risks.

To understand how our activities may impact affected stakeholders, we consult stakeholder using surveys and focus groups to gather their perspectives on environmental and social risks. These insights were integrated into our assessment and prioritisation of material topics. Our time horizons differ from those defined in ESRS due to regulatory requirements—such as ECB climate risk assessment timelines—and the financial planning and business cycle characteristics of the financial sector. Accordingly, we use: short-term (up to 3 years), medium-term (4–9 years), and long-term (beyond 10 years, aligned with our 2050 climate targets).

CHANGE TO THE PROCESS FROM THE PREVIOUS REPORTING PERIOD

Material information on impacts, risks, and opportunities is determined based on the double materiality principles outlined in the ESRS and aligned with our corporate strategy and stakeholder priorities.

During the reporting period, we enhanced our process for identifying, assessing, and managing IROs. We introduced new materiality thresholds, including a secondary financial materiality threshold for non-financial risks, aligned with ESRS, to better reflect the information needs of our primary report users. Our methodology was refined through updated assessment scales for impact dimensions and non-financial opportunities, the adoption of quantification templates aligned with our risk and performance management frameworks, and the alignment of financial risk thresholds to our Risk Policy. In addition, we introduced a financial materiality threshold for opportunities and further integrated the DMA into our risk and overall management processes.

Identifying material matters and IROs

PROCESS

Our Double Materiality Assessment (DMA) applies a structured methodology to identify, assess, and prioritise Impacts, Risks, and Opportunities (IROs) across our value chain. First, we conduct a gap analysis of the previous year's IRO list and analysis of internal and external sources. We identify our positive and negative actual and potential impacts, and the connected risks and opportunities, followed by an assessment using updated materiality thresholds. The thresholds are defined in our Double Materiality Assessment Procedure, Risk Policy and Performance Management Procedure, we use a combination of internal expertise and external benchmarks – including Sustainability Accounting Standards Board (SASB) Materiality Map, peer disclosures, and professional publications – to ensure completeness and relevance.

To ensure that our IRO identification process is evidence-based, forward-looking, and aligned with ESRS and financial sector expectations we apply assumptions with regard to time horizon definitions and the related forward-looking subjective assessments; sector prioritisation based on portfolio exposure and regulatory relevance; stakeholder input about material concerns; and indirect data sources.

We apply predefined qualitative and quantitative input parameters to systematically identify and assess material impacts, risks and opportunities: including internal and external data sources, stakeholder inputs. Impact materiality is assessed using scale, scope and (for negative impacts) irremediable character (severity), and likelihood only for potential impacts. Financial materiality for risks and opportunities is assessed separately using likelihood of occurrence and defined financial thresholds linked to potential magnitude of effects, time horizons tailored to the financial sector, sectoral exposure and climate/environmental risk levels, stakeholder relevance, and applicability across subsidiaries.

Our DMA considers impacts arising both from our own operations and through business relationships across the value chain. Engagement with external stakeholders further informs our understanding of indirect impacts, enabling a comprehensive view of our footprint and responsibilities.

Impacts linked to suppliers, customers, and other partners are assessed by subject matter experts who review due diligence outcomes, including ESG governance, controversies, and sector-specific risks. These experts also contribute to the design of due diligence tools, ensuring that high-risk relationships are flagged and reflected in the IRO prioritisation.

ASSESSMENT METHODOLOGY

To quantify financial risks and opportunities, we applied methods aligned with our internal performance and risk management frameworks. Financial risks and opportunities were assessed based on the potential magnitude of the financial effects and likelihood. Financial opportunities were assessed using bespoke templates integrated into our performance management system, while financial risks were evaluated using two distinct templates – one for credit risk and another for non-credit financial risks – aligned with our enterprise risk management framework.

Non-Financial risks were assessed based on Luminor internal non-financial risk grid covering customer, regulatory, reputational, and operational dimensions. Non-financial risks were assessed based on their potential magnitude of effects and likelihood. Non-financial opportunities were assessed applying a custom 0-5 opportunities' potential significance assessment scales and likelihood applied across the three time horizons.

Actual negative impacts were assessed based on severity, and potential negative impacts were assessed based on severity and likelihood, with severity taking precedence for human rights impacts. Positive impacts were assessed based on scale and scope for actual impacts, and scale, scope and likelihood for potential impacts. Impact materiality and financial materiality were assessed using distinct ESRS criteria. Likelihood is assessed for potential impacts, risks and opportunities. For actual impacts, likelihood is not applicable, and assessment is based on the relevant impact criteria only. Likelihood is assessed using our internal non-financial risk grid as defined in our Risk Policy.

We prioritise actual negative impacts based on their severity, considering scale, scope, irremediable character. Potential negative impacts are prioritized based on severity and likelihood, using custom scales and thresholds across the three time horizons. Positive impacts are assessed based on their significance, determined by scale and scope for actual impacts, and by

scale, scope and likelihood for potential impacts. Impacts are evaluated using structured scoring and prioritised against defined materiality thresholds to determine which sustainability matters are material for reporting.

Sustainability-related financial risks are prioritised using the same materiality thresholds as other financial risks, in line with our Risk Policy. For non-financial risks, an additional financial materiality threshold is applied to identify disclosure-relevant risks, considering potential impacts such as loss of customers or deposits, and effects on net commission income (NCI), net interest income (NII), or operating costs.

CONNECTION OF IMPACTS WITH RISKS AND OPPORTUNITIES

We identified impacts through our DMA, then connected relevant risks and opportunities from previous assessments and identified additional ones based on internal and external data analysis, focus group discussions, and stakeholder engagement.

DECISION-MAKING PROCESS AND RELATED INTERNAL CONTROL PROCEDURES

The outcome of our DMA is validated through a structured governance process. Assessments are performed by subject matter experts, signed off by Level 2 IRO owners, and reviewed by second-line controllers based on risk type mapping to our Risk Policy. Final approval is granted by our management bodies.

INTEGRATION OF DOUBLE MATERIALITY ASSESSMENT INTO RISK AND OVERALL MANAGEMENT PROCESSES

We embed the DMA in our risk management framework through a multi-layered approach which draws on outputs from existing internal risk assessments to align with our risk tolerance and strategic priorities. All identified sustainability-related risks are mapped to our established risk taxonomy, to promote consistency and comparability across risk categories. A dedicated risk controller validates these risks. Risk evaluations follow our internal policy, applying predefined thresholds and methodologies to determine materiality and prioritisation. Identified sustainability-related risks are documented and managed in line with our risk management framework.

For material ESG-related risks and related impacts, we developed transition plans that outline strategic responses, targets, and implementation pathways. These plans are reviewed and approved by management board and are aligned with our long-term business strategy and regulatory obligations. Progress against these plans is monitored and reported regularly by the designated transition plan or risk owners.

Controls and procedures applied to manage IROs

We have established following controls and procedures to effectively manage impacts, risks, and opportunities:

Identification and assessment: we have a procedure in place, regulating roles and process of executing the annual double materiality assessment and procedure for identification of climate-related and environmental risks, assessment of their impacts and addressing them;

Oversight: The Council oversees the identification, assessment, and management of IROs and approves outcomes of double materiality assessment. Board is responsible for approval of the outcome of the Analysis of Impact of Climate & Environmental Risk Drivers on the Business Environment (C&E RBE); and integration into strategy and internal processes: the Board discusses the outcomes of double materiality assessment and C&E RBE outcome. The Board also approves the transition plans to treat the identified material risks and ensures monitoring and reporting of the progress of these plans.

The Board discussion of C&E RBE outcome aims to address the implication of the outcome on the business model and our strategy. Considering that ESG risks are treated as risk drivers that can impact all other material risk types meaning they are embedded within and managed through established risk management processes for overarching risk categories.

Risk management and internal controls over sustainability reporting

We updated our Sustainability Reporting Standard in 2025.

We use a three-step process of compilation, review, and approval, to prepare the IRO assessment and sustainability disclosures. First, the business owners assign subject matter experts for each function or process, who then define the requirements for specific inputs, and review the requirements for validity, verification and disclosure purposes with an eye to data availability and strategic considerations. The qualitative and quantitative disclosures are then validated and approved. Second, the Head of the Sustainability Department and Head of Investor Relations and Sustainable Finance confirm that all the signoffs have been completed and sign off the statement themselves. Third and finally, the disclosures are attested by the CFO and CRO.

For risk assessment in scope of DMA, we used materiality thresholds as described above. All risks above the threshold are considered material IROs for disclosure. To validate the risks identified for both qualitative and quantitative disclosures, we apply several controls, such as the 'four eyes' principle and second line risk controller review and challenge. The qualitative data we gather is validated by the business owner of the disclosure to ensure completeness and accuracy and that it is presented in accordance with the applicable internal and external regulations. For quantitative disclosures on climate and environmental data, we follow our Data Quality Management procedure and principles and the ESG Data Management Procedure.

The primary source for data collection is our data warehouses and, if unavailable, we aim to collect primary data directly from customers or from external data sources. The data collected is then reported in aggregated form. For data that is not available, data proxy methodologies based on international standards such as PCAF are used, or alternatives are developed in-house. Once the data has been aggregated for specific reporting purposes, the content is validated by the data owners or service owners. The four eyes principle is followed when the data is validated, as the data validator must then be someone other than the data provider.

Strategy, business model and value chain

We are the leading independent bank in the Baltics and the third-largest provider of financial services in our region. We serve the financial needs of individuals, families, and companies. We are here to improve the financial health of our customers and our home countries, and to support their growth.

We were created in 2017 when DNB and Nordea joined their Baltic operations, to serve the financial needs of these dynamic economies. We manage our business by customer segment – Retail Banking and Corporate Banking – on a pan-Baltic basis from our headquarters in Estonia and branches in Latvia and Lithuania. Our subsidiaries provide leasing, manage pension funds and offer e-commerce payments. Retail Banking provides banking services to individuals and micro-businesses and is responsible for our pension companies. Corporate Banking provides banking services to legal entities and is responsible for our leasing and e-commerce payments companies. We operate only in the Baltic countries and target our services at residents of the Baltic countries, or individuals and companies with a strong connection to the Baltic countries.

We are well placed to grow with our customers. We have a simple and straightforward business model; we are a retail and corporate bank, and our business is balanced, by customer type, by sources and uses of funds, and by country. We are easy to understand. Loans to customers' account for two-thirds of our assets, we are funded primarily with Deposits from customers, and are well capitalised. We support the development of Baltic capital markets and are committed to carbon neutrality by 2050.

Our upstream value chain network includes key partners such as investors, service providers like IT firms, regulatory bodies, and other financial institutions.

Total number of people employed	2024	2025
Estonia	630	686
Latvia	960	981
Lithuania	1,040	1,118
Total	2,630	2,785

The sustainability goals of the portfolio are described in the section 'Targets' in the chapter 'Climate change'. Assessments of lending portfolios and the sustainability goals are provided under the chapter 'Climate change', section 'Actions'.

Our business model resilience is ensured through our integrated strategy planning processes and our internal governance framework. We organise our internal control framework aligned to the three lines of defence model. The first line is our business and support divisions, which are responsible for managing their risks in accordance with our policies, procedures and controls. The second line is a control function that comprises our compliance and risk divisions, which are independent of the first line, and monitor its activities. Internal audit is the third line, and it assesses the effectiveness of the first two lines.

Our three-year financial plan is jointly developed by business and risk functions, aligned with our risk appetite and financial targets, including climate targets, and is approved annually by the Council. Business model risks are continuously assessed through market, geopolitical and performance analyses, with ESG, including climate and environmental considerations fully embedded into planning.

Corporate Governance report

We have a two-tier governance structure where supervisory (non-executive) functions are carried out by the Supervisory Council ('Council') and management (executive) functions are carried out by the Management Board ('Board'). The Council oversees the activities of the Board in managing Luminor. Members of the Council cannot be at the same time members of the Board. We refer to the Council and Board collectively as 'Management Bodies'.

We are governed by Estonian Law and follow applicable legal regulations of the European Union and guidelines provided by the European Banking Authority on internal governance. Aligned with these legal requirements and guidelines we have adopted internal regulations to ensure robust governance. These include the implementation of the 'three lines' model, comprehensive risk management process, defined internal values, conflict of interest management principles, compliance frameworks, regular internal control mechanisms and remuneration policies. Our Governance Policy, our principal internal governance document, defines and guides these practices. We updated our Governance Policy in October 2025.

The General Meeting of Shareholders (General Meeting) is a statutory body through which our shareholders exercise their rights. We have one class of registered common shares. Each share grants one vote at the General Meeting. The General Meeting takes decisions that fall within its competence under commercial law, such as decisions on amending the articles of association, increasing and reducing share capital, electing, and removing members of the Council, approving the annual report, distributing profit, and electing a statutory auditor. In addition, the General Meeting is responsible for approving significant changes to our strategy, material changes to our key policies, and financial plans which anticipate an increase in capital, and engaging in other significant activities. The General Meeting is entitled to decide on any other matter related to our activities at the request of the Council or the Board. No General Meetings were convened in 2025, instead 14 decisions were made per capsulam.

Shareholders who hold at least 10% of the votes in Luminor Holding, our parent company, can appoint their pro rata proportion of members to our Council. A sufficiently high number of independent members are elected to the Council to help ensure that the interests of all internal and external stakeholders are considered, and that independent judgment is exercised where there is an actual or potential conflict of interest. DNB, as the minority shareholder, has the right to request a review of our compliance with the Compliance Risk Policy or ESG standards and other similar corporate social responsibility policies and standards, which may be conducted by an external person or by the relevant requesting party.

CONDUCT

We aspire to the highest standards of ethical and professional conduct. Every employee is expected to know and follow our values, ethical standards, and the principles of compliance and risk management. Each employee must abide by our code of conduct and identify, prevent, and report bribery and corruption. We have developed corporate values – curiosity, collaboration, and focus – and expected behaviours to reinforce the principles of compliance and risk management.

We promote an ethical culture and make every effort to identify, prevent, and manage conflicts of interest to ensure all stakeholders are treated fairly and shareholder's interests are protected. Principles for management of conflict of interest are established by the Council which oversees its implementation and effectiveness. We hold mandatory training on conflict of interest management to ensure that all employees have adequate knowledge of our policy and other relevant internal rules and principles and that all activities within their responsibility are carried out in accordance with the rules. Any conflicts of interest are considered when selecting new members to the Management Bodies and key function holders.

Following the gifts and events reporting procedure, our employees do not accept or offer gifts regardless of their value, nor participate in events if doing so can be considered inappropriate, may be ethically questionable, or may affect the receiver or giver in performing their duties. Our internal regulation provides specific examples to support employees in making decisions on the appropriateness of gifts and events and handling such situations.

We manage information on a "need-to-know" basis, i.e., information is accessible only to employees who have a justified need for such information to carry out their duties. To manage information flow, we have also established physical separation and restricted access to information, or other specific arrangements, around and within certain business activities where confidential customer information is handled.

DIVERSITY AND INCLUSION

We value and respect each employee for their differences. We are committed to building and maintaining a workforce comprising individuals from diverse backgrounds, young people, persons with disabilities, and employees representing a variety of cultures. Employees are supported and encouraged to develop their full potential and utilise their unique talents.

We recognize the importance of diverse composition of the Management Bodies. At 31 December 2025, female representation on the Council was 33.3% as compared to a target of 40.0%. The chairs of the Management Bodies review progress on gender diversity goals as key performance indicators in their annual assessments. If targets are not met, the chairs document the reasons, measures to be taken, and timeframe for measures to rectify the situation.

We do not tolerate any form of intimidation, bullying, scapegoating, or harassment in the workplace. We take measures to protect employees from discrimination and have a process in place to discipline those who are in breach. We encourage employees who feel they have been subject to discrimination to raise their concerns through the speak up process so that corrective measures are applied.

DIVIDEND POLICY

We manage the Total Capital Ratio on a Luminor Group level at a Capital Target of the regulatory requirement (excluding P2G) plus a Management Buffer of 150–300bps. We are committed to return excess capital to shareholders while maintaining a strong capital position to support our business activities, stability and allow for profitable growth. Capital distribution will be made by way of dividends or capital repatriations. Dividends are to be paid with a guideline of around 50% of the annual profit. All excess capital above the Capital Target level is considered for distribution, meaning that the actual dividend pay-out ratio can be higher or lower than 50%. A pay-out ratio higher than 50% will be considered if actual capital is above the Capital Target, and the stress testing outcome supports a higher pay-out ratio. A pay-out ratio lower than 50% will be considered, e.g., if we assess there are strong growth opportunities, if there are unforeseen changes in the regulatory framework for the capital calculations, or if the macro environment or portfolio credit quality deteriorates significantly beyond what is reflected in the Management Buffer. The actual pay-out ratio needs to be supported also by the outcome of the stress testing. Additional return of excess capital resources will be considered in the form of extraordinary dividends/capital reductions when the CET1 capital can be replaced by issuing Tier 2 and AT1 capital instruments.

KEY FUNCTION HOLDERS

The Key function holders are the Chief Financial Officer, Chief Compliance Officer, Chief Risk Officer, and Head of Internal Audit, who each represent a function with significant influence over Luminor. The first three are members of the Board, therefore the Head of Internal Audit is the only Key Function Holder in this sense.

SELECTION CRITERIA TO THE MANAGEMENT BODIES

Only people who have the necessary professional experience, necessary skills, and possess the appropriate character may be members of our Management Bodies. In order to facilitate independent opinions as well as constructive challenging, we seek for members that have an independence of mind and, in particular, are able to resist groupthink. The principles of selecting members for Management Bodies, including assessing suitability and diversity, are set out in our internal regulations. Appointments to Management Bodies are approved by the ECB.

We have established processes and regulations to address sudden or unexpected absences or departures of the chair or members of the Board, and key function holders. By doing so we aim to ensure the transfer of knowledge, preservation of organizational memory, and to support managerial and business continuity during periods of temporary or permanent leadership changes.

The members of the Council are appointed amongst the nominees of Luminor Holding shareholders as provided in the shareholders' agreement, with each shareholder having the right to remove and replace a member appointed by it. The Council and the Nomination and Governance Committee members, and the CEO, can identify the need to appoint a new Board member, and the Nomination and Governance Committee provides guidance, selection criteria and service conditions for the respective position and performs the suitability assessment.

COUNCIL COMMITTEES

The Council has four mandatory committees to assist it in exercising its tasks. Each committee has at least three members, a documented mandate, and must meet quarterly. Members of the committees are appointed based on their knowledge, skills, and experience relevant to the committee's work, aligned with competencies required regulation. At yearend Council committees were:

Committee	Audit	Nomination and Governance	Remuneration	Risk
Chair	Peter Kleinschmidt	Nils Melngailis	Maria Elena Cappello	Betsy Nelson
Members	Tanvi Davda Ottar Ertzeid Bjørn Erik Naess Betsy Nelson	Mark Ashton-Rigby Maria Elena Cappello Mathias Favetto Bjørn Erik Naess	Tanvi Davda Ottar Ertzeid Nils Melngailis Betsy Nelson	Mark Ashton-Rigby Ottar Ertzeid Mathias Favetto Peter Kleinschmidt
Role	To oversee the establishment of accounting policies, review and monitor the financial reporting process; monitor the statutory audit of the annual financial statements and assurance of the annual and consolidated sustainability reporting; support an effective internal audit process; and, review and approve non-audit services performed by an audit firm carrying out the statutory audit.	To contribute to the selection and assessment of the Board members; monitor diversity of Board decision making process; recommend mandate for the Board members; assess suitability of the Council members before appointment; assess suitability of Key Function Holders; can recommend candidates to the Supervisory Councils of subsidiaries; and, monitor the effectiveness of the policies outlining succession planning principles and review their design and implementation.	Assesses mechanisms used to ensure the remuneration system takes into account risk, capital, liquidity, and earnings of the bank; assess the achievement of performance targets; test how remuneration policies react to events; oversee the design of remuneration packages; advise on the identification of material risk takers; recommend the amount of severance payments above limits; and, approve proposals for variable remuneration pool collectively for all employees and individually for members of Management Bodies.	To ensure sound risk management is applied consistently; oversee risk culture; support formation of an optimal capital and liquidity structure; oversee alignment of customer products with the business model and risk strategy; analyse if the principles of remuneration consider prevailing risk profile; oversee investigations of non-compliance with laws and regulations; oversee the Compliance and the Risk divisions; and, collaborate with internal control functions.
ESG role	Monitors the process of sustainability reporting and how information is reported in accordance with the sustainability reporting standards; it makes recommendations for ways to protect the integrity of the process.	Evaluates governance arrangements, promotes diversity within the governing bodies, and recommends policies for equality, non-discrimination, and diversity.	Oversees the integration of ESG risk considerations into remuneration policies so that sustainability principles are embedded into the bank's reward framework.	Oversees our approach to ESG; reviews our Sustainability strategy, monitors that ESG risks are integrated within the risk management framework, recommends the level of risk, and ensures that ESG factors are considered in risk processes, reports on ongoing ESG risk and oversees the progress made towards ESG risk objectives.
# meetings	11	4	7	11
# decisions in circulation	4	11	6	10

SUPERVISORY COUNCIL



**Nils
Melngailis**



**Mark
Ashton-Rigby**



**Maria Elena
Cappello**



**Tanvi Prafulchandra
Davda**

	Nils Melngailis	Mark Ashton-Rigby	Maria Elena Cappello	Tanvi Prafulchandra Davda
Position	Chair	Member	Member	Member
Committees	Nomination and Governance (Chair); Remuneration	Nomination and Governance; Risk	Nomination and Governance; Remuneration (Chair)	Audit; Remuneration
Joined	January 2019	December 2024	July 2020	November 2024
Born	1965	1968	1968	1972
Nationality	American Latvian	British	Italian	British
Education	BA Political Science Boston College, Newton, MA	MA Mathematics, University of Oxford	BSc Engineering, University of Pavia	MSc Finance, London Business School
Other positions	Chairman, Supervisory Board, PrivatBank; Independent Director, Chair of the Audit Committee, Qualco SA	Director, Sentiance NV; Trustee, British Heart Foundation	Independent Director, BPER Banca; Director, Finomnia	Director, Ashrah Advisory Limited; Director, Paragon Banking Group PLC
Background	Operating Executive, Centerbridge Partners; Co-head FIG, Alvarez & Marsal	Group COO, Barclays; Group CIO, Barclays; CIO, Corporate & Investment Bank, JPMorgan Chase	Director, Bank Monte dei Paschi di Siena; Director, Telecom Italia; Director, Saipem; Director, Prysmian; CEO, Nokia Italia	Co-founder and CEO, Saranac Partners; Member of the Board, OfQual; Director, Student Loans Company
Location	Riga, Latvia	London, UK	Milan, Italy	London, UK
Status	Independent	Independent	Independent	Blackstone appointee
Attendance	16/16	16/16	14/16	16/16

The Council is our supervisory body which approves strategies, general principles of our activities, sets and monitors risk tolerance and risk appetite, and supervises our activities, as well as those of the Board. General rules for convening meetings and organisation of the work of the Council are set forth in our internal regulations, Commercial Code, Credit Institutions Act and Articles of Association. Regular meetings of the Council ensure oversight over the Board along with additional meetings when required. Decisions are passed by simple majority participating in the meeting. Decisions submitted to the Council shall be discussed before by respective committee of the Council. The Council is required to meet at least quarterly. In 2025, the Council held 16 meetings and adopted 26 decisions in circulation. The members elect from among themselves a chair, who is responsible for the effective functioning of the Council, coordinates its work and contributes to the flow of information within the Council and the Board.

				
Ottar Ertzeid	Mathias Patrick Laurent Favetto	Peter Alexander Kleinschmidt	Bjørn Erik Naess	Elizabeth Jane (Betsy) Nelson
Member	Member	Member	Member	Member
Audit; Remuneration; Risk	Nomination and Governance; Risk	Audit (Chair); Risk	Audit; Nomination and Governance	Audit; Remuneration; Risk (Chair)
January 2022	August 2020	November 2025	January 2019	December 2020
1965	1988	1966	1954	1954
Norwegian	French	German	Norwegian	American British
MA General Business, Norwegian Business School, Oslo	MSc Management, HEC, Paris	Master, Industrial Engineering and Management, Karlsruhe Institute of Technology	MSc Economics, Norwegian School of Economics, Bergen	MBA, Thunderbird School of Global Management, Phoenix, AZ
Director, DNB Livsforsikring AS; Chair, Entra ASA; Vice chair, Argentum Fondsinvesteringer AS; Director, Telenor ASA	Member, Supervisory Councils, NIBC Holdings and NIBC Bank	Member, Supervisory Board, N26, Chair of the Risk and Audit Committee (to March 2026)	Chairman, Argentum Fondsinvesteringer AS; Director, Hafslund AS,	Member, Supervisory Board, Oschadbank
CFO, DNB Bank ASA; Head, DNB Markets; Director, Oslo Børs; Director, Bankenes Sikringsfond	Merchant Banking, Goldman Sachs	Senior Partner Pricewaterhouse- Coopers	CFO, DNB AS; CFO, Aker Kvaerner; CFO, Carlsberg; CFO, Orkla	VP Risk and Compliance and CRO, EBRD; Head of Credit Risk, FSA Head of Corporate Banking, JPMorgan Chase EMEA
Oslo, Norway	London, UK	Frankfurt, Germany	Oslo, Norway	London, UK
DNB appointee	Blackstone appointee	Independent	DNB appointee	Independent
15/16	16/16	2/2	15/16	15/16

The chair promotes open and critical discussions, ensures dissenting views are expressed and discussed, and the Council makes informed, sound decisions. The Council consists of 5 to 15 members elected by the General Meeting, whose term of office is five years. As at 31 December 2025, the Council had 9 members of six nationalities, 56% of whom were independent, with a Gender diversity ratio of 50%. There were no employees' and workers' representatives on the Council; we do not have any other models of employees' and workers' representation in the Council (such as advisory committees including employees or employee ownership of shares).

All Council members bring extensive senior-level experience from the financial sector, having held prominent positions in banks or investment firms. Their accumulated skills, knowledge, and experience support our commitment to effective governance and prudent decision-making. Karl von Rohr was appointed Chair of the Council effective 1 January 2026, and joined the Nomination and Governance, and Remuneration, committees.

MANAGEMENT BOARD



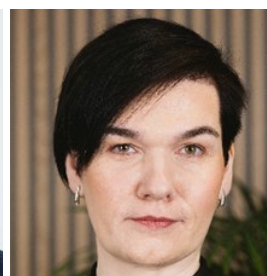
Wojciech Sass



Ossi Leikola



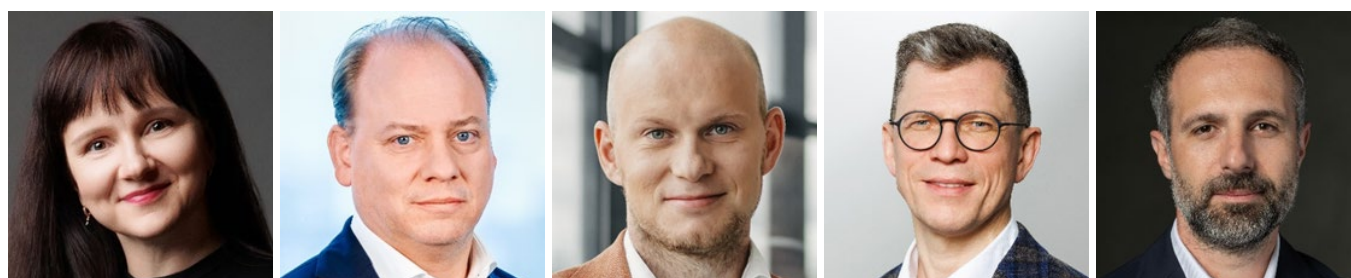
Diego Biondo



Mari Mõis

	Wojciech Sass	Ossi Leikola	Diego Biondo	Mari Mõis
Position	Chair	Member	Member	Member
Title	Chief Executive Officer	Deputy Chief Executive Officer	Chief Risk Officer	Chief Compliance Officer
Divisional responsibility	-	Operations	Risk	Compliance
Committees	Credit; Conduct; Portfolio Review	Data governance; Portfolio Review (chair)	Non-financial Risk (Chair); Credit Model Risk (Dep chair); Asset & Liability; Data governance; Portfolio Review	Non-financial Risk (Deputy chair); Conduct (Chair)
Appointed	March 2024	December 2023	October 2023	September 2022
Born	1972	1967	1967	1979
Nationality	Polish	Finnish	Italian	Estonian
Education	MSc, Operations Management, University of Cracow	MSc Technology Aalto University, Espoo	BA Business Administration University of Turin	BA Law University of Tartu
Background	Co-founder and CEO, Aion Bank; CEO, Nationale Nederland Poland; Vice President, BNP Paribas Bank Polska	Head of Operations, Nordea; Head of Poland and the Baltics, Nordea; Managing Director, Metos BV	Head of Risk Governance, BPER; Chief Risk Officer, Gruppo Banca Carige; EVP Risk, UniCredit Bank	Chief Legal Officer, Luminor Bank AS; Chief Financial Officer, DNB Bank AS; General Counsel, DNB Bank AS
Location	Tallinn, Estonia	Tallinn, Estonia	Tallinn, Estonia	Tallinn, Estonia
Attendance	47/50	47/50	46/50	45/50

The Board is our executive body which directs day-to-day activities pursuant to the strategies and general principles of activities approved by the Council. The Board reviews proposals and explanations presented to it, takes decisions, and reports appropriately to the Council. General rules for organisation of the work of the Board, including rules for the convening meetings, voting procedures, and decision-making process, responsibilities and number of Board members, are set forth in our internal regulations, Commercial Code, Credit Institutions Act and Articles of Association. Decisions are passed by a simple majority of members participating at the meeting. In case of equality of the votes, the Chair or, in their absence, the Deputy chair of the Board, has a casting vote. Members of the Board are elected and removed by the Council. The Council appoints a Chair from the members of the Board. The Chair, or any two Board members, legally represent the Bank. Areas of responsibility are divided between the members to suit their skills, expertise, and responsibilities.



Jonna Pechter	Johannes Proksch	Tanel Rebane	Jonas Urbonas	Enkelejd Zotaj
Member	Member	Member	Member	Member
Chief Marketing Officer for Retail Banking	Chief Financial Officer	Chief Sales Officer for Retail Banking	Head of Corporate Banking	Chief Information Officer
Retail Banking, Marketing	Finance	Retail Banking, Sales	Corporate Banking	Technology
Pricing (chair)	Asset & Liability (Chair); Data governance (Chair); Pricing (Deputy chair); Portfolio Review (deputy chair)		Credit (Chair); Pricing	Change Advisory Board (Chair); Portfolio Review
June 2025	July 2024	June 2025	December 2024	October 2024
1983	1969	1985	1976	1982
Estonian	Austrian	Estonian	Lithuanian	Albanian
MA, Economics, MA, Marketing, University of Tartu	MBA, University of Economics & Business administration, Vienna	MA, Corporate Finance, Tallinn University of Technology	MSc Finance, Vilnius University	MBA, Economics, University of Tirana
Head of Estonian business, Bigbank; Head of Retail Banking in Estonia, Citadele; Manager consumer lending, Bigbank	CTO & CFO Addiko Bank AG; CFO & Deputy CEO, HETA Resolution AG; CFO and advisor to financial start-ups	Head of Customer Relationship Management, Luminor; Head of Sales, Luminor; Director, Enterprise Estonia	Head of Corporate Banking, Luminor LT; Head of Corporate banking Nordea LT; Head of business customers, SEB Vilnius	CIO and CTO, Raiffeisen Bank Ukraine; Executive Director of IT, Raiffeisen Bank Croatia; Executive Director of IT, Raiffeisen Bank Albania
Tallinn, Estonia	Tallinn, Estonia	Tallinn, Estonia	Vilnius, Lithuania	Tallinn, Estonia
31/31	46/50	29/31	46/50	45/50

Board members are assessed before their appointment in accordance with legislation and internal regulations. Information and documentation on the proposed candidate, as specified in the Credit Institutions' Act is submitted to the ECB at least 10 days before deciding on his/her appointment.

All Board members hold higher education qualifications, each having attained at least a bachelor's degree and they bring relevant professional experience in their respective fields. Notably, all Board members have prior experience in the banking sector, which ensures a strong understanding of banking operations, products, and industry. In 2025 the Board held 50 meetings and adopted 59 decisions in circulation. The Board consists of 3–10 members whose term of office is 5 years. As at 31 December 2025 the Board had 9 members of seven nationalities, The Board members represent 7 European nationalities, with a Gender diversity ratio of is 28.6%. This diversity brings a broader range of insights and expertise and at the same time ensures that the geographical markets in which Luminor operates are represented, fostering an understanding of local market.

BOARD COMMITTEES

At year-end the Board committees were:

Committee	Asset and Liability	Change Advisory Board	Conduct	Credit	Customer Risk
Chair	Chief Financial Officer	Chief Information Officer	Chief Compliance Officer	Head of Corporate Banking	Head of local Corporates Department
Role	Support the CFO and Board in activities related to asset liability management, i.e. balance sheet development, liquidity and funding management, interest rate risk, foreign exchange risk, ESG Risk, treasury, dividend distribution arrangements as well as efficient capital planning, management and allocation.	Support the Board in governance of IT change management in order to ensure that IT changes are evaluated, authorised, tested, deployed, documented, and reviewed in a controlled manner. Committee takes go / no-go decisions for the IT change implementation and deployment to the production environment.	The Committee is responsible for supporting Management Board in review of Conduct issues related to possible breaches of Code of Conduct, Whistleblowing procedure and Speak-up procedure, personal transactions, disclosure of inside information, conflict of interest, bribery and corruption or internal fraud cases.	Issue recommendations related to credit policies and processes, approve acceptable risk criteria and financing requirements. Take all necessary credit decisions in respect to individual customers (including, approval of assumptions of loan loss provisions of non-performing exposures) and financial institutions.	Oversight of AML/CFT and sanctions compliance related customer risk. Take decisions related to establishing or retaining a business relationship with a customer who meets ML/TF/PF and Sanctions Risk Conditional Limitations
ESG role	Assesses sustainability risk, and applies principles in liquidity, funding and capital.			Considers ESG risk drivers in decisions; promotes sustainable business conduct.	

The Board has 11 committees. The Credit committee is required by law while the other committees have been established voluntarily to assist the Board in its work. Each committee has its own regulations, describing composition of the committee, its mandate, and responsibilities of the committee's members. Committees' members are appointed by the Board from employees who are subject-specific experts. Committees meet as frequently as provided in their regulations.

Data Governance	Investment Products Governance	Model Risk	Non-Financial Risk	Pricing	Portfolio Review
Chief Financial Officer	Manager of Investment Products & Growth Unit	Head of Model Risk Management	Chief Risk Officer	Head of Retail Banking Marketing	Deputy Chief Executive Officer
Support the Board in defining and executing a data and information strategy. Provide oversight, challenge, and advice on data and information management decisions, guidance on emerging and developing data management risks and relevant recommendations to the Board.	Supporting the Board in the governance of investment products and/or services manufactured and (or) distributed by us to ensure compliance with the internal regulations and laws and regulations governing investment products and/or services.	Challenge and approve new risk models, model changes and extensions, non-material model changes, extensions and model re-approvals. Review, challenge and endorse model risk related specific technical topics, and approving the mitigation actions for identified model risks	To recommend for approval non-financial risk treatment decisions, oversee non-financial risk scenario planning, monitor the implementation of operation risk management framework, review proposed risk treatment actions for incidents, support 3rd party risk management.	The committee supports the Management Board in activities associated with pricing of for all Retail and Corporate/SME lending products and deposit products, including current account and profitability.	Established as the primary coordination and management body to oversight of Luminor Change Portfolio budget, performance and forecasting of the Value streams, Projects and other Initiatives.
	Approves integration of ESG into investment principles, asset allocations, and investment operations.		Safeguards stability and reputation, guides on emerging risks.		

INTERNAL CONTROL FRAMEWORK IN CONNECTION WITH THE PREPARATION OF THE ANNUAL REPORT

We aim to ensure that our financial reporting is in accordance with generally accepted accounting principles, applicable laws, and regulations, and our financial statements provide a true and fair view of the financial position. The Board has responsibility to set, approve and monitor processes and controls intended to ensure the integrity of the accounting, financial and non-financial reporting systems, and preparation of these financial statements pursuant to the relevant law.

The Board has delegated to the Finance Division the responsibility for financial reporting and establishment of the arrangements and internal control aimed at ensuring the integrity of the accounting and financial reporting systems, including financial and operational controls and compliance with the law and relevant standards. Financial reporting is subject to an internal control framework that entails adequate, clear, transparent, and effective routines for reporting, monitoring, and follow-up processes.

Our internal control framework aims to ensure: effective and efficient operations; prudent conduct of business; sound change management; adequate identification, measurement, and treatment of risk; compliance with laws, regulations, supervisory requirements and our internal policies and procedures, processes, rules and decisions; sound administrative and accounting procedures; and, reliability of financial and non-financial information internally and externally.

We have a 'three-lines' internal control framework. The first line, which consists of our business divisions, and support divisions and departments, own their risks and are responsible for ongoing managing of risks according to our policies, procedures, and controls. To mitigate process and reporting risk we have segregated duties, and applied IT general controls, entity and process-level controls, and preventive and detective controls.

The second line is an independent control function authorised and responsible to monitor and control that the first line adheres to our risk appetite and risk management framework and all applicable rules and regulations. The second line, which consists of Compliance and Risk divisions, are responsible for internal second line control over financial reporting in their respective areas. Our internal controls ensure that financial reporting is true and fair and that external financial statements are prepared in accordance with generally accepted accounting principles, applicable laws and regulations.

The third line consists of Internal Audit division, which is an independent internal audit function. It conducts risk based and general audits and reviews that the internal governance arrangements, processes, and mechanisms are sound and effective, implemented and consistently applied. The Internal Audit division evaluates independently whether operations and related controls, risk management and governance processes and structures are functioning, adequate and effective to enhance our ability to reach our business objectives. All activities, including financial reporting process fall within the scope of Internal Audit, which provides independent, objective assurance that financial reporting is adequate and in compliance with applicable internal and external regulatory requirements. Internal Audit provides the Council, the Audit Committee and the Board with a written report regarding their activities and evaluation on governance, risk management and internal control processes.

The Council's Audit Committee oversees our accounting and financial reporting. It oversees the establishment of accounting policies, including tax accounting, as well as the budgeting process, reviews and monitors the financial reporting process, reviews our consolidated financial reports and considers whether they are complete, consistent with information known to the Audit Committee's members, and reflect appropriate accounting policies and principles, as well as provides the Council with recommendations aimed at ensuring reliability and objectivity of consolidated financial reports, integrity of the financial reporting process and make recommendations to the Council for the approval of consolidated financial reports.

Furthermore, the Audit Committee is responsible for monitoring the effectiveness of the statutory audit of these financial statements, and assurance of the sustainability statement, to ensure the statements are prepared according to applicable laws, regulations, and standards, including reviewing and monitoring the independence and objectivity of the statutory auditors.

MANAGEMENT OF BRANCHES

We operate in Latvia and Lithuania via branches. The branches enter into agreements and undertake obligations on our behalf, acquire other rights and assume other duties, consistent with the law and their mandate. Branch managers are appointed by the Council and are accountable for the activities of their branch.

MANAGEMENT OF SUBSIDIARIES

All subsidiaries are separate legal entities which follow our values, code of conduct, and policies. Individuals with relevant knowledge, skills and experience, and with consideration of collective suitability, are appointed to the supervisory councils and members of the management boards are full time employees of the Bank or subsidiary. Subsidiaries' chief executive officers and management boards are responsible for the implementation of the decisions taken by the Management Bodies. The supervisory councils (or management boards) follow legal and regulatory provisions when reporting to the Board.

Certain subsidiaries are supervised by the relevant Estonian, Latvian and Lithuanian financial supervision authorities. Governing bodies of the subsidiaries ensure that the subsidiary operated according to legal or regulatory requirements. The proportionality principle shall always be considered when applying regulatory requirements, which includes, but is not limited to the size of the subsidiary as well as the size of its customer base, nature and complexity of business and products, and gravity of risk. Dividend payments are governed by internal regulations.

AUDITORS

We have been audited by AS PricewaterhouseCoopers (PwC) since 2018. Lauri Past is the lead partner for the audit.

GOVERNANCE OVERVIEW OF ESG

The individual and collective suitability of each Board member is observed continuously to make certain they remain fit and proper for their task. The Nomination and Governance Committee of the Council is responsible for the suitability assessment, assessment and re-assessment of individual and collective suitability of the Board, assessment and re-assessment of individual and collective suitability of the Council. While assessing their suitability, adequacy of knowledge, skills and experience is assessed. Among others, a knowledge of environmental, social, and corporate governance topics is assessed. Council members demonstrate knowledge in the ESG, including an understanding of sustainability standards and how to contribute to our sustainable development, and collectively their knowledge and expertise are assessed as sufficient.

To keep their knowledge up to date, both Management Bodies have training plans aligned with regulatory guidelines. The training plans are approved each year and include ESG related trainings. In 2025, members of the Management Bodies received training on the taxonomy reporting and climate-related risks. Additionally, tailored training sessions and individual consultations are offered to Board members to address specific needs. To fulfil their obligations members can access experts for advice or training and may request information internally.

Newly appointed members of our Management Bodies receive individual induction plans to help them integrate into the organisation and their appointed role. Members are expected to complete their individual plans and be proactive in seeking further opportunities to raise their knowledge including becoming familiar with our strategy, culture, and risk management, and understanding of sustainability standards.

The Council approves the organisational structure, the mandates of the members of the Board, the Sustainability Policy, the Risk Policy, and the Risk Appetite Framework-Policy, which integrates responsibility for ESG risk drivers, and oversees the implementation of ESG risk management including strategies and due diligence processes.

Oversight of sustainability-related impacts, risks and opportunities is exercised by the Council, as defined in our Sustainability Policy. The Council is the highest governance body with formal responsibility for sustainability matters. Its responsibilities include: Setting our sustainability objectives and ensuring their alignment with our strategy; overseeing sustainability-related risks and opportunities, including monitoring the effectiveness of the associated internal control and risk management framework; reviewing the Board's execution of sustainability-related activities and performance; assessing results of the DMA which follows Board approval; evaluating regular ESG reports and monitoring key sustainability indicators; reviewing and recommending the Sustainability Statement within the Annual Report for approval by the shareholders.

The Council monitors the risks we face, including ESG risks, potential impacts, and emerging scenarios, via regular reporting and ad hoc risk and sustainability assessments. The Council is responsible for steering the execution of the strategy, which considers material impacts, risks and opportunities and risk appetite, and through its committees receives an over-arching view of the risk landscape and the progress of the strategy. IROs are integrated with business units, which aligns risk management with operational activities and decision-making processes.

In accordance with Sustainability Policy, the Board is responsible for: developing the Sustainability Policy and the sustainability objectives within our strategy and ensuring that strategic sustainability objectives, defined by the Council, are performed; ensuring proper identification of material sustainability-related impacts, risks and opportunities through a comprehensive DMA; approving the results of the DMA and proposing it for review of the Council; approving Transition plan for the management of ESG-related material risks; ensuring adequate assessment of the sustainability-related risks and their integration into risk limit setting; monitoring and directing the management of material sustainability-related impacts, risks and opportunities through comprehensive integration into the group strategy and business practices, including the financial plan; ensuring application of ESG-linked remuneration principles and monitoring their alignment with ESG-related risk appetite and with transition plans and ensuring transparent sustainability reporting and public disclosures.

Council approves the mandate of each Board member. According to mandates, each member of the Board has a distinct area of expertise and members, other than the CEO, act as head of a division. As such they are accountable for the risks within their bailiwick, which collectively creates a comprehensive oversight structure.

The Chief Financial Officer is responsible for setting, maintaining, and updating our ESG framework, for preparing quantitative and/or qualitative sustainability disclosures and annual corporate sustainability reports as required by EU and national legislation, for monitoring climate and environmental risk drivers' impact on our business model, operations and its value chain and monitoring our impact on ESG factors.

The Chief Risk Officer ensures the implementation of overall risk strategy, and lead the defining of risk appetite, is responsible for continuous identifying and monitoring of material risks, aggregate and emerging risk, monitors the actual risk profile of the Bank, and facilitates the implementation of the risk management framework, including Risk Policy, Risk Appetite Framework and other risk related internal regulations, risk limits and risk controls. CRO is also responsible for reporting risks to the Board and the Council, either through the Risk Committee or directly. In addition, the CRO has the authority to raise concerns and escalate issues directly to the Council, particularly regarding developments that significantly affect or may affect our risk profile.

The CFO collaborates with the CRO to develop an appropriate risk appetite aligned with our strategy and risk-taking capacity.

CFO monitors climate and environmental risk drivers' impact on our business model, operations and its value chain, and ensures associated information's submission, where relevant, to the Management Bodies. CFO also monitors our impact on ESG factors, and ensure associated information's submission, where relevant, to the Management Bodies.

We regularly monitor key risk indicators and maintain reporting systems to track risk exposure and incidents and performs reporting by means of the quarterly risk report.

CRO is responsible for reporting all risks to the Board and Council through the Council Risk committee. CRO reports on all material inherent and residual risks, provide relevant independent information, analysis and expert judgment on risk exposures to the Board and Council and provides aggregated quarterly risk reports to the Board and Council.

Risk committee through quarterly risk reports monitors the implementation of ESG risk drivers in Risk Management Framework. Council monitors regular reports and relevant data on our risk position, including causes for changes and loss events.

We have established a procedure regulating roles and process of executing the annual DMA. All Risk Division Departments act as ESG-related risk controllers and review and challenge ESG-related risks linked with the risks controlled by the Risk Division. They participate in the DMA related discussions, where relevant; and provide review and challenge of the ESG-related risk assessments including review of evidence and documentation of feedback. Risk division also ensures that DMA outcomes associated with ESG-related risks are considered for the purpose of the Risk Identification and Risk Materiality Assessments

Board provides their input to IRO identification through a questionnaire or focus group discussion or validation of the final list of material IROs, as well as approves the DMA outcome (the final list of Material IROs) and submit this for information purposes to the Council.

Our strategy for sustainability is embedded within the strategy and approved by the Council. It defines our long-term sustainability ambition and outlines key objectives and targets, which address the material IROs for our business. All sustainability objectives and targets are operationalized through internal governance, and business planning processes, relying on the management of material IROs and transition planning.

Group Sustainability Department, part of Finance Division, reviews the Sustainability strategy annually and suggests updates to promote ESG principles, develops and proposes ESG targets for various divisions, and is responsible for sustainability monitoring and reporting, including this annual sustainability statement. Together with the Risk and the People and culture divisions, the Department trains staff to foster a risk-aware culture, while continuous feedback mechanisms across all functions keep risk controls effective and aligned with evolving regulatory requirements and business needs.

INTEGRATION OF SUSTAINABILITY RELATED PERFORMANCE IN THE INCENTIVE SCHEME

Our Remuneration Policy integrates ESG targets into Employees' annual performance criteria through Performance fee components with Key Performance Indicators (KPIs) that track whether targets have been met. Sustainability considerations are integrated into performance with ESG-related targets (incl. C&E risks) applied at appropriate organizational levels rather than always directly cascaded. Social sustainability is embedded through the Risk Culture framework, while environmental aspects are reflected through capability building and decarbonization and emissions-related targets assigned to relevant managerial levels.

The policy is applied through the Performance Fee for Staff procedure. Performance Fee is not a guaranteed payment and depends on whether performance criteria or KPIs are met, as well as taking into account impact of performance fee pay-out to capital and liquidity or overall economic situation. At the beginning of measurement period, the Council approves the performance criteria for the Members of the Board, Branch Managers, Key Function Holders, and Heads of Internal Control Functions, and sets the overall performance criteria like objectives and KPIs. Those performance criteria are then cascaded to Level 2 (L2) managers and onwards. ESG considerations are integrated into Luminor's performance management system through dedicated sustainability targets that form 5–10% of the annual objectives for Group and Division Heads, with divisions cascading these expectations to their departments and units, who define the most relevant ESG KPIs for their activities. In line with internal policy, unit head of each employee must define and incorporate into performance discussions ESG-related targets when cascaded to the unit. While the Performance Management IT system does not apply predefined thresholds or formula-based scoring for ESG, performance is evaluated holistically, and sustainability performance can influence the Performance rating. The system also includes automatic performance adjustments in cases of conduct breaches or incomplete mandatory training, ensuring accountability and alignment with Luminor's values.

There are no predefined thresholds and no formula-based scoring—performance is evaluated holistically. Sustainability performance can positively impact the Performance Fee when targets are achieved. It cannot negatively reduce the award. Reductions apply only in cases of conduct breaches or incomplete mandatory training.

SUMMARY OF REPORTING LINES, MANAGEMENT AND OVERSIGHT OVER SUSTAINABILITY MATTERS

We have defined our governance model, roles and accountabilities for ESG risks and are integrating them into our existing policies. Our governance structure helps us take strategic decisions to manage the risks we face including climate-related and environmental risks, to set goals, and to monitor progress towards these goals

How we integrate ESG-considerations into our governance

Supervisory Council Approves and monitors the sustainability strategy and policy	Audit Committee	Serves as an independent body to oversee complete, accurate and consistent reporting and consideration of material risks
	Nomination and Governance Committee	Assesses the Board's structure, performance, and expertise collectively and individually. Monitors effectiveness of internal governance arrangements.
	Remuneration Committee	Oversees the integration of ESG risk into remuneration policies
	Risk Committee	Oversees, challenges and monitors ESG risk appetite and advises the Council on it; monitors the ongoing ESG risk in quarterly risk reports
Management Board Implements sustainability strategy, takes strategic decisions on E&S factors. Proposes risk appetite for portfolios sensitive to climate risk	Investment Products Governance Committee	Supports Board in the governance of investment products and/or services manufactured and (or) distributed by us
	Conduct Risk Committee	Supports the Board in activities associated with assets and liability management
	Credit and Customer Risk Committees	Considers ESG risk drivers in customer assessments and credit decisions
	Non-Financial Risk Committee	Supports Board in management of non-financial risks
Business and support divisions Sustainability strategy is defined in the roadmaps of each division and the functions that are responsible for its deployment	Retail Banking	Develops sustainable finance solution for customers. Divisions apply the risk framework for their own activities and bear primary responsibility for assessing, managing and monitoring their risk levels in all risk categories, including ESG risks. This is the first line of internal control and it proposes risk appetite limits.
	Corporate Banking	
	Support divisions and departments	
	Group Sustainability	Drafts the Sustainability strategy and framework. Proposes targets, updates, and promotes ESG, facilitates trainings and capabilities development.
Compliance Division	Monitors compliance risk status, oversees implementation of regulatory requirements, advises on internal governance and, by applying the risk-based approach, plans and conducts assurance activities	
Risk Division	Defines risk appetite in collaboration with other divisions and departments and establishes risk management and monitoring systems. Facilitates the establishment of internal control frameworks	
Internal Audit Division	Following a risk-based approach, evaluates whether operations, related controls, risk management and governance processes are functioning, adequate and effective	

Our management bodies are updated about material impacts, risks, and opportunities at least once a quarter. The Sustainability department reports on sustainability-related strategic initiatives and relevant KPIs covering the climate change related impacts, risks and opportunities, Risk division reports on risk and resilience analysis, while People & Culture department reports on the gender gap in the annual remuneration report. For each material risk, a transition plan is approved by the Board, and the progress against the plan is reported by the transition plan or material matter owner and by Risk Division each quarter.

Our first line, second- and third- line monitor compliance of our actions with our policies and procedures. When internal control functions review processes that include due-diligence activities, they will also verify that the due-diligence steps were

completed correctly. Their findings will be reported to the relevant management bodies. Second line reports the results of the activities to the Board and, the third line informs the Board and reports to the Council on its work and recommendation.

When the management bodies oversee strategy, decisions on major transactions, and the risk management process, they consider the impacts, risks, and opportunities presented in these reports. These reports let the Council see the impact of strategy execution. All material IROs connected to material matters, as listed in the section 'Change to the process from the previous reporting period' are reviewed and discussed in Risk Committee and in Supervisory Council annually as part of the double materiality assessment (DMA).

We have incorporated ESG-related risks as a component of our Remuneration policy. These ESG-related risks are integrated into the variable remuneration components, with KPIs that track whether targets for performance are met. At the start of the measurement period, the Council approves the overall performance criteria for the year, for members of the Board selected employees. These performance criteria are then cascaded, with each level incorporating sustainability risks and our voluntary sustainability commitments into their performance criteria. These commitments encompass all areas of ESG, including climate and environmental concerns. Financial performance is monitored on a weekly basis by the Board, while KPIs are reviewed quarterly, while a report on performance is reported each quarter submitted to the Council.

Management bodies approve our material IROs, the related material matters for disclosure in the annual sustainability statement and thresholds for financial and impact materiality. The DMA is coordinated by the Sustainability Department and foreseen to be conducted every three years. In the interim years, in case there is no significant methodology update, we use the earlier assessment outcomes. Maintaining the earlier assessment is acceptable if there have been no material changes in our structure, or in external factors that could affect new or existing IROs. Significant alterations like major mergers or acquisitions, entry into new sectors, or operational overhauls, are scrutinised for any possible implication for human rights or public reputation. The periodic review lets our sustainability disclosures to respond to evolving circumstances.

We have a dedicated Double Materiality Assessment Procedure and Sustainability Reporting Standard to create transparency in addressing ESG topics. This framework has four elements for annual disclosures and for our strategy. First, the DMA evaluates various aspects of ESG within our operations. Second, the C&E RBE process identifies critical areas within climate and environment risk factors space, delineates specific impacts, and formulates strategic responses tailored to our operations. It is also an input for prioritising Climate Risk Stress Testing within the credit portfolio by focusing on the economic activities or risk drivers affected.

Third, the ESG Risk Drivers Impact Assessment is run during the Risk Policy review as part of the broader Risk Materiality Assessment (RMA) process to quantify the impact of ESG risk drivers on various risk types and sub-types within our Risk Taxonomy which gives us a comprehensive understanding of how ESG considerations intersect with existing risk categories. Fourth, and finally, the Climate Risk Stress Testing assesses the risk exposures from climate and environmental factors. By stress testing our operations we can assess vulnerabilities, prioritise material risk drivers, and inform the strategic decision-making and risk limit-setting processes effectively.

DUE DILIGENCE PROCESSES

We perform ESG due diligence on our suppliers, customers, and investment activities. These processes are governed by our Sustainability Policy and ESG Due Diligence Standard, in accordance with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. ESG due diligence topics comprise environmental issues, including climate change and biodiversity, social issues, including human and labour rights, and governance practices, including ethical business conduct.

We conduct risk-based due diligence, considering the severity, nature and likelihood of the actual and potential impacts of our business on the environment and society. We focus our effort where the consequences and probability of negative impacts are the highest. Compliance with the Exclusion List, that is part of our Sustainability Policy and contains ESG related restrictions, is ensured within our credit, sourcing and investment processes.

Customer due diligence is conducted at the start of a customer relationship, and on an ongoing basis. The nature of the questions we ask depends on the risk level of the customer and the size of their credit exposure. We focus our due diligence

on larger corporate clients operating in industries that are linked to ESG risks, as described in the section 'Customer ESG Risk Assessment'. If we identify significant actual or potential negative impacts, we conduct a more detailed assessment and may amend our relationship with the customer.

Core elements of ESG due diligence and related paragraphs in the sustainability statement.

Elements	Related paragraphs
Embedding due diligence in governance, strategy and business model	General information, Summary of reporting lines, management and oversight over Sustainability Matters, Integration of sustainability related performance in the incentive scheme, and Changes in Material Impacts, Risks, and Opportunities; Environmental Information, Climate change, Biodiversity and ecosystems, Impacts, Risks, And Opportunities; Social Information, Customers and end users, Impacts, Risks, And Opportunities
Engaging with affected stakeholders in all key steps of the due diligence	General information, Summary of reporting lines, management and oversight over Sustainability Matters', Stakeholder engagement, and Identifying material matters and IROs, Process; Notes To The Sustainability Statement, Climate and environment related policies
Identifying and assessing adverse impacts	General information, Identifying material matters and IROs, Assessment methodology; Environmental Information, (1) Climate change, Focus area 1 - Climate Risk Framework and Resilience, (2) Biodiversity and ecosystems, Impacts, Risks, And Opportunities; Social Information, Customers and end users, Impacts, Risks, And Opportunities
Actions to address adverse impacts	Environmental Information, Climate Change, Biodiversity and ecosystems, Actions; Social Information, Customers and end users, Actions
Tracking the effectiveness of these efforts and communicating	Environmental Information, (1) Climate Change, Targets, and Focus Area 2 - Decarbonisation of Operations, Operational Decarbonisation, (2) Biodiversity and ecosystems, Targets; Social Information, Customers and end users, Targets.

Due diligence is performed for all new suppliers before the start of a relationship and is then reviewed periodically, with a frequency that depends on the Tier of the supplier. For suppliers we have developed due diligence questionnaires by levels of criticality and importance of a supplier to us. The questionnaires for Tier 1 and 2 suppliers have specific questions on ESG related business practices. Where gaps are identified they serve as input in risk assessments. During 2025 we engaged our Tier 1 and 2 suppliers to address ESG due diligence gaps identified in 2024. We require that all suppliers from outside the EU and EEA confirm they adhere to our Code of Responsible Business Conduct for Third Parties (part of our Code of Conduct) or provide their internal code with similar rules to that of our Code of Conduct in all material aspects.

Our Discretionary Portfolio Management (DPM) business and Pension fund management subsidiaries, integrate ESG due diligence into their investment processes. We assess ESG risks for all financial instruments before including them into our investment offering and reassessed their characteristics each year. We require third party fund managers to be signatories to the United Nations Principles of Responsible Investment (PRI), where feasible and relevant. If available and relevant, we may consider external ESG risk ratings for financial instruments in our risk assessment.

IRO IN THE STRATEGY PROCESS

Our management bodies are accountable for our strategy, which is governed by the Business Model Risk Policy and Strategy Planning Procedure. Our strategy and associated Financial plan are reviewed annually integrating material IRO treatment approaches. The strategy implementation is monitored by our management bodies including the use of Key Performance Indicators (KPIs).

Our strategy process links with other processes like the internal capital adequacy assessment process (ICAAP) and the internal liquidity adequacy assessment process (ILAAP), which incorporate the outcome of the double materiality assessment (DMA) and climate and environmental risk materiality assessment (C&E RMA) processes. Risks identified are considered throughout the entire process, including the initial strategy discussions, financial planning, Risk Appetite Statement (RAS) and limits reviews, and stress testing.

The material impacts resulting from the DMA in 2025 are described in the related material topic sections of the report, with a description of how the material negative and positive impacts affect, or are likely to affect, people or the environment, and

whether and how the material impacts originate from or are connected to our strategy and business model by having an actual or potential financially negative or positive impact on us. These sections also provide the expected time horizons for the material impacts and a description of the nature of the activities or business relationships and affected stakeholders through which we may experience the material impacts.

In 2025, an assessment of current and short-term financial effects of material sustainability-related risks and opportunities was performed as part of the DMA, RMA and stress-testing exercises. The assessment concluded that these risks and opportunities do not currently have a material impact on the financial position, financial performance or cash flows. Furthermore, none of the identified material risks or opportunities present a significant risk of material adjustment to the carrying amounts of assets or liabilities within the next 12 months. Our strategy and business model are designed to remain resilient in the face of material sustainability-related impacts, risks, and opportunities. For every material risk, we develop transition plans that are scenario-based, aligned with our strategic objectives and consistent with regulatory expectations. These plans incorporate the results of our short-, medium- and long-term climate risk assessments and support ongoing portfolio steering and risk mitigation.

Changes in material IROs

This year we improved our DMA methodology to reflect more closely with ESRS requirements. As a result, the IRO analysis related to these three topics: Circular economy, Own workforce, and governance-related issues including Business conduct and Cybersecurity, did not meet our updated thresholds for disclosure-relevant materiality such as Circular economy, Own workforce, and governance-related issues including Business conduct and Cybersecurity. The thresholds we adopted previously led to an overestimation of disclosure relevance for certain topics. The updated thresholds, including a secondary financial materiality threshold, ensure that only the topics with significant actual or potential impacts and financial relevance are disclosed, enhancing the clarity and utility of our reporting. We report on material topics – climate change, biodiversity and ecosystems, and consumers and end-users – aligned with ESRS. For topics that were material in 2024 but are no longer material this year, we disclose progress against previously reported targets and plans. No additional entity-specific disclosures are included beyond the ESRS requirements.

Stakeholder engagement

We maintain a structured approach to understanding the interests and views of our key stakeholders as they relate to our strategy and business model. Through our annual DMA we engage with a wide range of stakeholders using focus groups, surveys, and analysis of public reports. The insights gathered are assessed systematically and translated into IROs, which inform strategic planning and sustainability priorities. This ensures our business model remains responsive to stakeholder expectations and aligned with evolving sustainability-related risks and opportunities.

Our stakeholder engagement reveals customer preferences with regards to sector or activity specific financial flows, identify potential need to adjust our financing strategy and or our exclusion list, and reveals where we may enhance our approach. To understand the perspectives of customers and how this impacts our portfolio, we also analyse the impact of C&E risks on our Business Environment (C&E RBE), and run C&E Risk Impact Materiality on our main risk types

The C&E RBE analysis and the Risk Taxonomy Review and Risk Materiality Assessment, which are inputs to our DMA, inform climate change risk drivers which may be material for us and which portfolios they effect. Once a risk is identified as material, it is stress-tested via ICAAP and ILAAP process to evaluate whether the taxonomy needs to be updated, and risk mitigation approach and measures defined such as developing new products or setting risk limits.

As part of the DMA, we present an overview to the Board and the Council, outlining how stakeholder engagement was conducted. The key stakeholder views are translated into IROs during the DMA process and assessed accordingly. Only disclosure-relevant material IROs are submitted to the Board for approval and to Council for oversight. Additionally, the outcomes of other large-scale stakeholder engagements—such as our biannual employee pulse survey—are presented to the Board to ensure continued alignment with stakeholder expectations.

Our stakeholders, their expectations and how we engage with them directly or through internal subject matter experts.

Stakeholder	Expectation	Engagement
Creditors	Compliance with laws & regulations; Good governance; Transparency; Reducing environmental impacts	Reporting; Direct contacts; analysis of top creditor reports IROs
Customers	Cooperation; Product quality & safety; Data privacy & security; Supporting local development	IRO benchmarking of top corporate and leasing clients; C&E RBE; complaints analysis
Employees and managers	Responsibility; Service quality and safety; Advocating responsible finance; Reducing	Internal communications, surveys, trainings, Double Materiality Assessment process
Media	Service quality and safety; Advocating responsible consumption; Reducing environmental impacts	Direct contacts, events; Press releases; Double Materiality Assessment process
The natural environment	Restoration of biodiversity; Impact avoidance or minimisation	Review of sector ESG impacts research; ENCORE tool; use of Partnership for Biodiversity Accounting Financials (PBAF);
Owners and investors	Economic contribution; Sustainable growth; Risk management, governance, transparency	Council and Annual General meetings, meetings and conference calls with investors, analysis of top 20 investor reports for IROs
Peers	Market standards; Industry collaboration	Directly through local Banking Associations; IRO benchmarking via peer annual reports and industry best practices
Regulators	Compliance; ESG risk integration; Transparency	Reporting, audits, focus group with Legal, Risk, Compliance
Society and NGOs	Advocating responsibility; Service quality and safety; Reducing environmental impacts	External communications; Direct contacts; Interviews with large Baltic media companies in the DMA process
Suppliers and Partners	Advocating responsible practices; Responsible marketing; Consumer and market understanding	Meetings and direct contacts; ESG risk assessments; top suppliers annual reports analysis for IROs

ENVIRONMENTAL INFORMATION

Disclosures pursuant to Article 8 of EU Taxonomy Regulation

As a central pillar of the EU's sustainable finance framework, the EU Taxonomy Regulation establishes a unified system for identifying environmentally sustainable (EU Taxonomy aligned) economic activities and sets disclosure requirements designed to enhance transparency.

Integrating the EU Taxonomy into our business operations primarily involves complying with its reporting obligations, which in turn requires a detailed assessment of our activities and investments. This assessment enables us to evaluate the extent to which our financing and investment activities contribute to the EU's environmental objectives—covering climate change mitigation and adaptation, water and marine resources, the circular economy, pollution prevention and control, and biodiversity protection. It also helps us better understand prevailing market conditions and emerging sustainability trends.

Although Paris alignment remains one of our key priorities, we have not yet established specific Key Performance Indicators (KPIs) linked to the EU Taxonomy's Green Asset Ratio (GAR). This is primarily due to the ongoing evolution of the regulatory landscape surrounding the EU Taxonomy. Until there is greater clarity regarding the final scope, framework, detailed interpretations, and data availability associated with the EU Taxonomy requirements, setting robust long-term KPIs tied to the GAR or similar metrics is challenging. Still, we are continuously strengthening our understanding of the EU Taxonomy and its implications.

The EU Taxonomy reporting is also heavily affected by the data availability. Therefore, our EU Taxonomy report is subject to continuous change due to increased quality of data collected from customers and enhanced market practices for the CSRD related disclosures.

RESTATEMENTS

In line with EU Commission's guidance, restatements may be necessary when there are significant changes or updates to the methodology or data used in the initial reporting period. Due to enhancement in data availability, we have reassessed the counterparties classified as CSRD companies. Due these adjustments, the overall GAR for 2024 remain unchanged at 3.6% (based on turnover KPI of the counterparties) and increased to 3.7% (based on CapEx KPI of the counterparties).

Our EU Taxonomy report follows the templates established in the Disclosure Delegated Act as amended by the Commission Delegated Regulation (EU) 2026/73 of 4 July 2025. Therefore, to ensure consistency and comparability, we have restated the main EU Taxonomy KPIs presented in Template 0 using the revised methodology introduced by the amended Disclosure Delegated Act. Under the revised methodological framework, the value of assets covered by GAR denominator has reduced, leading to an increase in GAR ratio. As a result, Luminor's 2024 GAR increased to 5.9% (based on turnover KPI of the counterparties) compared to previously reported 3.6%, and 6.1% (based on CapEx KPI of the counterparties) compared to 3.7%.

Furthermore, exposures to local governments and assets under management have been reassessed as not material for the 2024 reporting year, in accordance with Article 4, paragraphs 1(a) and 1(f) of the amended Disclosure Delegated Act, respectively. This ensures that the same assessment approach is applied consistently across both reporting years.

BASIS OF REPORTING

Our EU Taxonomy report is prepared on the basis of the scope of the prudential consolidation determined in accordance with the EU Regulation No 575/2013 following the reporting templates applicable for credit institutions.

Within the reporting templates, we cover consolidated information on the Bank and its subsidiaries: (i) activities of the Leasing Subsidiaries are consolidated and reported as lending activities to financial undertakings, non-financial undertakings and retail customers; (ii) activities of Asset Management Subsidiaries are consolidated and reported as assets under management; (iii) concerning Maksekeskus AS, that operates in e-commerce payment industry, Bank's EU Taxonomy report shall represent its activities within KPIs on fees and commissions for services other than lending starting with 2028.

In our EU Taxonomy report, the on-balance sheet items are reported in gross carrying amount. Gross carrying amount is the amortised cost of a financial asset before adjusting for any loss allowance. Because of this, the total assets in the EU Taxonomy templates are 109 million EUR higher than the total assets reported in the balance sheet in Luminor Bank Annual Report. The difference is comprised of loss allowances across several assets.

Determination of EU Taxonomy eligibility and alignment

Following requirements stemming from Disclosure Delegated Act, we disclose information on EU Taxonomy eligibility and alignment of the exposures (loans, advances, debt securities) to financial and non-financial CSRD companies (i.e. such companies that are subject to the EU Taxonomy Regulation reporting requirements themselves), local governments, households (mortgage lending, renovation loans and vehicle leasing) and collaterals obtained by taking possession. Methodology for determining EU Taxonomy eligibility and alignment of the above indicated categories, as well as data limitations, are described below.

Exposure to CSRD companies

The CSRD companies were identified based on publicly available and internal data. Our reporting covers large public interest companies and parent public interest companies of a large group (including their subsidiaries) that have published their EU Taxonomy reports.

For the calculation of the amount of EU Taxonomy eligible and aligned exposures to CSRD companies, we evaluated use of proceeds of exposures and considered the gross carrying amount of general-purpose loans, debt securities and equities of relevant accounting portfolios weighted by the respective counterparties' KPIs.

Main data constraints and limitations related to CSRD companies are absence of central external database for the list of CSRD companies which may result in omission in our reporting. Furthermore, due to unavailability of the counterparties' respective KPIs for year-end 2025, the assessment and disclosure of EU Taxonomy eligibility and alignment for the relevant exposures was based on the counterparties' 2024 EU Taxonomy reports data.

Retail exposures

Disclosure Delegated Act distinguishes reporting of retail exposures among residential real estate exposures, loans granted for house renovation purpose and vehicle leasing. The exposures to residential real estate are considered as financing EU Taxonomy eligible economic activities in case a household loan is collateralised by residential immovable property.

We have reported as EU Taxonomy aligned those mortgage loans that comply, based on our assessment and internally available data, with the substantial contribution criteria applicable for acquisition and ownership of buildings in respect of climate change mitigation objective and do no significant harm (DNSH) criteria to climate change adaptation objective established by the Climate Delegated Act. Minimum safeguards have not been evaluated for residential real estate exposures based on the requirements established in the Disclosure Delegated Act as well as interpretation provided in the Final Report on Minimum Safeguards by Platform on Sustainable Finance, dated October 2022. Further, we have not evaluated whether the mortgaged real estate fall under the category of buildings with a total floor area of 5,000 square meters or more, nor have we assessed the requirements related to this specific classification because of data limitations.

In Lithuania and Latvia, loans collateralised by buildings constructed before 31 December 2020 with an EPC class A or higher, as well as buildings classified within the top 15% of the national building stock based on PED (as defined in publicly available studies by the national banking associations), were identified as EU Taxonomy aligned. In Estonia, due to a lack of PED data in our systems, we could not apply the top-15% criterion, and only exposures collateralised by EPC class A buildings were recognised as aligned.

For buildings built after 31 December 2020, compliance with the substantial contribution criteria for climate change mitigation objective was assessed in relation to buildings' PED being at least 10% lower than national thresholds of nearly zero-energy buildings (NZEB). EU Taxonomy aligned exposures conforming with this criterion were identified for Lithuanian and Latvian mortgage portfolios. The alignment of Estonian mortgages could not be confirmed due to lack of PED data on individual building level in our systems.

For the purposes to verify compliance with DNSH to climate change adaptation objective, we have utilised the results of analysis of C&E risks on business environment for retail mortgage portfolio (further information about the process can be found in Chapter 'Climate change', sub-section of 'Focus area 1 – Climate Risk Framework and Resilience).

With reference to the household renovation loans, we have adopted the conservative approach and only loans with the purpose of renovation, indicated in our lending products supporting systems, were considered as EU Taxonomy eligible exposures. In case of any uncertainty in respect of lending purpose (that is data limitation for the purpose of EU Taxonomy reporting), loans were not reported as EU Taxonomy eligible. The EU Taxonomy alignment of renovation loans of retail customers could not be established due to absence of data required for screening substantial contribution criteria as well as DNSH criteria.

As for the vehicle leasing, for the EU Taxonomy eligibility reporting purposes only those exposures that are generated after 1 January 2022 (the date of application of the disclosure requirements) are reported. Due to unavailable data for screening of the DNSH criteria, the EU Taxonomy alignment of motor vehicle loans of retail customers was not determined.

Exposures to local governments

Our classification of local government entities is based on the European System of Accounts (ESA) definition, in line with established financial reporting standards. These exposures were assessed as not material for 2024 and 2025 in accordance with Article 4, paragraph 1a, of the Disclosure Delegated Act as exposures to local governments amount to 2.8% and 3.8%, respectively, of the total on-balance-sheet exposures with known use of proceeds covered by GAR denominator. Therefore, the assessment of EU Taxonomy eligibility and alignment of these exposures was not performed.

Assets under management

Under asset under management exposures, we consolidate exposures pertaining to discretionary portfolio management service provided by the Bank as well as pension funds management activities performed by Asset Management Subsidiaries.

As revenues generated from assets under management activities accounted for 1.82% and 2.1% of total net revenue for 2024 and 2025, respectively, KPI for asset under management is not reported in accordance with Article 4, paragraph 1f of the Disclosure Delegated Act, and EU Taxonomy eligibility and alignment evaluation of the respective exposures was not performed.

EU TAXONOMY KPI DEVELOPMENT

The main KPI of the credit institution is Green Asset Ratio (GAR) reflecting the proportion of a credit institution's assets that finance and are invested in EU Taxonomy aligned economic activities as a proportion of the total covered assets.

	2024				2025			
	Taxonomy aligned activities, €m		KPI, %		Taxonomy aligned activities, €m		KPI, %	
	Turnover-based	CapEx-based	Turnover-based	CapEx-based	Turnover-based	CapEx-based	Turnover-based	CapEx-based
GAR stock	403.8	415.2	5.9	6.1	441.0	461.9	5.8	6.1
GAR flow	65.4	65.6	5.5	5.5	82.2	84.7	4.4	4.5
Financial guarantees	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
(a)	Assets under Management – not material				Assets under Management – not material			

a. AUM was not assessed due to non-materiality in accordance with Article 4, paragraph 1f of the Disclosure Delegated Act.

For the year-end 2025, Luminor's GAR decreased to 5.8% compared to year-end 2024 KPIs – 5.9% (based on turnover KPI of the counterparties) and remained unchanged with 6.1% (based on CapEx KPI of the counterparties), as calculated following amended EU Taxonomy framework.

Although the GAR presented a slight decline when calculated based on turnover and remained unchanged for CapEx calculation, Luminor's exposure to EU Taxonomy aligned activities increased to 441.0 million EUR (based on turnover KPI of the counterparties) compared to year-end 2024 KPIs of 403.8 million EUR, and to 461.9 million EUR (based on CapEx KPI of the counterparties) compared to year-end 2024 KPIs of 415.2 million EUR. The absence of growth in the GAR is therefore not driven by a reduction in EU Taxonomy aligned assets, but rather by a significantly larger increase (approximately 780 million EUR) in total GAR-covered assets. As a result, the growth rate of total covered assets outpaced the growth of aligned exposures, leading to a proportional reduction in the GAR KPI despite the positive development in the aligned asset volume.

The growth in Luminor EU Taxonomy aligned exposures is mainly stemming from the increase of the portfolio of EU Taxonomy aligned mortgage loans, which grew by 28.8 million EUR through new lending and data availability improvements, and to the rising exposure to CSRD companies and their subsidiaries. The full set of EU Taxonomy reporting templates applicable for credit institutions are included in the Note 1 within the Notes to the Sustainability Statement.

Climate change

We are committed to becoming carbon neutral by 2050. To achieve this, we have embedded climate and environmental objectives into our strategy and have developed a Climate and Environment Transition Plan. Furthermore, we have prioritised SDG 13, including to mitigate, adapt to, and reduce the impact of climate change. The policies, targets and actions disclosed are part of our C&E Transition plan and were developed based on the IROs identified through the Double Materiality Assessment (DMA) process we conducted and informed by our Analysis of the Impact of Climate & Environmental Risks on the Business Environment (C&E RBE).

IMPACTS, RISKS, AND OPPORTUNITIES

Climate change mitigation (GHG)

Material topic/ IRO description	Expected time horizon	Affected stakeholders
Material impacts to environment and/or people		
(-) Actual negative impact on climate change triggered by our financing or making investment decisions for customers that have high emissions exacerbating climate change and contributing to environmental degradation.	Short term	Nature, Employees, Customers, Regulators, Local Communities
Material financial risks and opportunities		
(-) Risk of financial losses triggered by defaulting Corporate customers due to not adjusting their business model to low carbon economy, and technological and market shifts resulting in limited access to finance, higher cost of operations.	Medium and Long term	Shareholders, Investors, Creditors
(-) Risk of financial losses triggered by defaulting retail customers due to physical climate risks impacting real estate	Medium and Long term	Shareholders, Investors, Creditors
(-) Risk of financial losses triggered by defaulted customers due to sensitivity to physical risk impacting directly on customers' assets, operations as well as indirectly via their value chain partners. Resulting in damage or reduced value of collateral, higher operating costs, or lost revenues.	Medium and Long term	Shareholders, Investors, Creditors, Customers

POLICIES

Our approach to climate change mitigation and adaptation is guided by our Sustainability Policy, which sets overarching objectives and principles for managing climate-related impacts, risks and opportunities. These are implemented through the Sustainability Standard developed in 2025 and supported by internal regulations and procedures that ensure integration across all business functions and subsidiaries. In addition to climate neutrality in our own operations by 2050 and reducing financed emissions in line with the Paris Agreement, we are committed to support customer transition through integration of C&E factors in credit and investment decisions. Accordingly, we require credible transition plans for high-risk sectors, restrict financing for coal, oil shale, and peat-based energy production unless a transition plan is in place, and minimise environmental impacts, protect biodiversity, and promote resource efficiency. Furthermore, we are committed to comply with ESG regulations and maintain transparent reporting, embed material ESG risks into risk management and manage them via transition planning, and expand sustainability-related products to support a low-carbon and climate-resilient economy.

Integration into our governance and operations is achieved through DMA, Process of Analysis of the impact of climate and environmental risks on our business environment (C&E RBE), Sustainability Reporting Standard, ESG Due Diligence Standard, and Risk Materiality Assessment (RMA) process. In 2025, we developed a Sustainability-Related Lending Standard and updated the Product Management Procedure to update the framework to define and classify all sustainability-related lending products and so set the foundation for future development of sustainability related loan products.

Our section on 'Policies, Procedures and Standards' gives further details on the regulations we use to identify, assess and mitigate our climate and environmental impacts including their scope and approval bodies. Together, these frameworks ensure sustainability objectives integration in the internal governance and their consistency across the organisation. And our value chain.

Our Sustainability Policy and supporting regulations are developed with consideration of the interests of key stakeholders, including customers, employees, and regulators. Policy proposals follow internal governance and external applicable regulatory

frameworks such as the ones established by EBA, ECB and EU Green Deal, and are aligned with our customer segments to integrate customer perspectives, ensure sales feasibility, and confirm compliance with applicable regulations.

TARGETS

We have set targets for mitigating climate change by reducing GHG emissions. We are committed to become carbon neutral by 2050, to become able to decarbonise our portfolio, and to reduce our Scope 1, 2, and 3 operating emissions by 42% in absolute emissions by 2030, compared to 2024 baseline. Currently, we have not set any targets related to climate change adaptation.

In 2025, we reviewed our Science Based Targets initiative to ensure continued alignment with emerging guidance. We have not resubmitted updated targets to SBTi, and the decision regarding resubmission remains under consideration. The targets for reducing our emissions from operations are derived from emission reduction pathways that could limit global warming to 1.5°C. The target of reducing emissions to net zero covers all three scopes of GHG emissions without residual emissions and is based on conclusive scientific environmental evidence. Achieving the target will mean that our impacts on climate change are in line, for example, with the European Climate Law, particularly the goal of climate neutrality by 2050 and with a climate scenario of a temperature rise of 1.5°C as defined by the IPCC.

Levers for reducing emissions

In 2025, we developed a plan to reduce our own Scope 3 emissions for material Scope 3 emission categories as classified in section 'Methodologies'. In this report, the term "our own Scope 3 emissions" refers specifically to Scope 3 categories 1–14, which arise from upstream and downstream value-chain activities linked to our operations. We use this term solely, to distinguish these categories from our Scope 3 category 15 financed emissions, which represent the dominant share of our overall Scope 3 footprint and relate to the climate impact of our financing activities rather than our operational value chain. We further aim to neutralise residual GHG emissions from our own operations through carbon removal using voluntary contributions. We have financed professional restoration works in Lithuania and organised an employee wetland restoration activity in one of the Baltic countries, alternating location by year.

We have set short-term decarbonisation targets as part of our corporate strategy and medium-term emissions reduction targets of own operations (Scopes 1, 2, and 3 categories 1–14). Early 2026, we restated our corporate targets and cascaded to business portfolios based on 2024 restated baseline. The targets and actions were established following the Science Based Targets methodology for 2035. Our Climate and Environment Transition Plan covers short- and medium-term targets and actions for our own operations and for our loan portfolio. For long term targets roadmap is planned to be developed as of 2032. The plan describes our impacts from our investment activities as well as our and our financing activities' impact on biodiversity, describing our management approach. The Climate and Environment Transition Plan has been aligned with our Financial Plan, including growth for new mortgages for highly energy efficient properties and corporate loans for renewable energy. The latest version of our Climate and Environment Transition Plan was approved in February 2026.

Locked-in GHG emissions

We have established a forward-looking analysis of carbon related assets, based on TCFD definitions, that is reported to Board on a quarterly basis. The emissions reduction of sectors is dependent on the companies' transition plans and capabilities, which influences if we meet our own decarbonisation targets, and drives our transition risk.

Challenges of climate targets and strategy implementation

A key challenge to delivering our climate strategy is our dependency on our customers to reduce their emissions, falling under our Scope 3 category 15. Additional complexities arise from the current deregulation in EU, limited availability of data, and uncertainty regarding the pace at which markets will adopt new technologies and practices. Further challenges include how fast new energy efficient technologies and energy generation technologies can be deployed, how far regulation will make real estate more energy efficient, and the decarbonisation of the electricity grid. We will support our customers through product development.

To address these challenges, we have trained our customer-facing employees to understand, and be able to discuss with our customers, sector-specific options for emissions abatement. We established sector-specific transition plan guidelines for our customers in 2025 for sectors relevant for Luminor. These guidelines were developed using the insights gathered from the

sectoral analysis made during the C&E RBE analysis, the sector-specific guidelines from the Industry ESG Risk Management Procedure, and market best practice. In 2026 we will continue building our transition planning capabilities, foster capability building of our customers, and focus on possibilities for transition-related products development and structuring for corporate customers

We have established an Industry ESG Risk Management Procedure that contains elements of sector transition guidance. During 2025, we completed the development of sector-based fact sheets for our relationship managers. In addition, we deepened the analysis our retail mortgage and corporate loan portfolios and continued improving the availability, quality, and completeness of our data, and of internal reporting.

We aim to align more closely our activities with the EU Taxonomy by increasing our data handling and processing capacity according to the criteria set in the Taxonomy delegated acts and improve our reporting and automation capacity. We have dedicated staff resources for this purpose, and planned expenditures on systems development.

We have considered the environmental, societal, and other developments in a range of climate scenarios to understand the potential impacts on our portfolios, determine the timeline of the impacts, and potential risk mitigation approaches, including decarbonisation to reduce transition risk. To assess the impact of C&E risks on our business environment, we applied data from multiple climate scenarios, including SSP3-7.5, RCP 8.5, and RCP 6.0. Our decarbonisation development was informed by Net Zero 2050, Below 2°C, Delayed Transition, and Current Policies scenarios and overarching purpose to limit global temperature rise to 1.5°C. In revising our decarbonisation roadmap, we considered evolving national and EU policies, technological advancements, and market developments.

Targets, Metrics and the Methodology

Targets and metrics for mitigating and adapting to climate change and metrics for measuring the progress towards our policy objectives of Net Zero by 2050 and gradually building up our ability to decarbonise our business.

Target	Base year	Target year	Target	2024	2025
Own operations					
Committed to Paris Agreement alignment, tCO ₂ e (own operating emissions) (a, b)	2024	2030	-42%	2,570.7	2,239.9
tCO ₂ e operational emissions per FTE vs. 2021 (a, b)	2021	2025	0.72	0.87	0.68
Mortgage portfolio					
Scope 3 financed emissions – Mortgage lending, tCO ₂ e (b, c)	2022	2035	-	241,562	151,578
Mortgage portfolio with EPC rating A or better, % of total mortgage exposure (b, d)	N/A	2027	30%	28.9	32.8
Corporate portfolio and carbon related assets					
Scope 3 financed emissions – Corporate lending, tCO ₂ e (b, c, e)	2022	2035	-	2,584,683	2,320,517
Scope 3 financed emissions – Motor vehicle leasing, tCO ₂ e (b, c, e)	2022	2035	-	74,483	57,368
Volume of new lending to corporate high energy efficiency real estate and renewable energy related projects (accumulated), €m (f)	-	2027	€228m	182.4	305.4
		2030	€700m		
Carbon intensity of the corporate lending portfolio, tCO ₂ e/€m (b, c, g)	2022	2035	-	698.2	580.0
Share of new lending volume in high climate risk sectors to clients that have transition plans in place, % (h)	N/A	2025	90%	81.3	75.2
High risk environmental assets in the corporate lending portfolio, % of total portfolio	N/A	N/A	<23%	17.9	17.3

- a. The target includes our own operations, and upstream emissions from the value chain for the main spend categories and excludes category 15 emissions. The current GHG emission reduction targets are limited by the GHG emissions inventory within the organisation as described in section Operational Decarbonisation. We have used this to recalibrate our interim targets in 2025 and realign the base year and our ambitions for emission reductions. The GHG emission reduction targets are presented separately for Scope 1, Scope 2 and operational

Scope 3 emissions, and for the target for financed Scope 3 GHG emissions found from the lending portfolio. All metrics are also presented separately in the section 'Notes to the sustainability statement'. The current targets for reducing operational Scope 1, Scope 2 and Scope 3 GHG emissions do not include the additional Scope 3 operating GHG emission categories that were included in our emission inventory in 2024. We have realigned the targets for medium term in 2025, which has resolved this inconsistency. We have set its baseline as 2021, when Scope 1, Scope 2 and Scope 3 emissions were calculated for the first time. We worked towards our goals throughout 2025, and we have set 2030 interim targets for reducing our operational Scope 1, Scope 2 and Scope 3 emissions versus a new baseline year of 2024. We will recalibrate the targets after the interim target year, aligning them with the latest emissions data and developments in environmental conditions. The detailed list of key climate change mitigation actions taken and planned organized by decarbonization levers are provided in the report chapter of 'Climate Change' section 'Actions'.

- b. We first reported emissions in 2021 and set our initial targets in 2021–2022, when our data collection processes were still developing. As a result, the original baseline did not reflect fully external factors, operational changes and the emission footprint scope was narrowed. For 2025 we set 2024 as our new baseline for the 2030 GHG reduction targets. This baseline has consistent emissions coverage, improved data collection, and higher data accuracy, and we consider it reliable for tracking progress. Targets with a 2025 target year continue to use their original base year and base value. In 2025, we also set new targets using 2024 as the baseline. This base year and value will remain unchanged unless we establish new targets or there are significant changes in our emissions inventory, data quality, or accounting methods. To ensure comparability, any future targets will be set using a base year no more than three years old at the time the target is first reported.
- c. Financed Emissions are calculated using the PCAF Plan A standard. PCAF database updates and improvements in the real data share have affected the figures. More details are given in the sections 'Methodologies' and 'Glossary'.
- d. Improvements in the real data share have affected the retail mortgage EPC structure figures from what they were in the previous year. We assess collaterals in the retail mortgage portfolio with missing EPC using proxy methodology developed in-house.
- e. Motor vehicle leases cover both private individual lending and corporate lending. More details are given in the section 'Notes to the sustainability statement' under the 'Methodologies', in 'Scope 3 – financed emissions data methodologies and limitations'.
- f. The loans reported cover development of renewable energy projects and real estate, construction, acquisition and renovation projects that comply with the technical screening criteria for the primary energy demand of buildings under the Climate Delegated Act or are granted one of the following or higher international certificates: LEED (Gold), BREEAM (Very Good), EDGE (Standard), Passive House (Standard), DGNB (Silver) or similar.. We reached our 2027 target in 2025. Henceforth, going forward we will report our progress versus our 2030 target.
- g. The internal carbon Intensity country level and aggregate emission intensity reduction targets were set in 2024 for the corporate portfolio, and they were aligned with the medium-term targets for loans for energy efficient real estate and renewable energy projects and the risk appetite metrics. These targets are integrated in the Financial Plan. Current emissions have been estimated using the PCAF methodology, which assumes that sector intensities are at their average irrespective of the energy types used.
- h. In scope are only customer groups with exposures above 5 MEUR and excluding off balance items such as limits, guarantees, letters of credit among others. We considered that customers fulfilled their requirement for transition plan submission if they had prepared a sustainability statement disclosing the existence of plans, appropriate activities and KPIs. In case customers have not prepared a sustainability statement but have submitted information indicating activities helping to transition to more sustainable practices we treated them as compliant with the requirement to have transition plan. Going forward we plan to provide customers with transition plan template which would meet our general requirements for transition planning documentation. The exposure is defined as “total credit commitment” which is the sum of the amount drawn, accrued interest and off-balance-sheet exposure

ACTIONS

Our Climate and Environment Transition Plan, sets our path to net zero by 2050. The plan integrates climate and environmental risks and follows the requirements of the EBA Guidelines on ESG Risk Management, including scenario analysis and stakeholder engagement. It outlines targets, based on the methodology by Science Based Targets Initiative (SBTi), roadmaps and our key levers. To support our Net Zero 2050 ambition and enhance resilience to climate-related risks, we have structured our Transition plan and the climate actions into three areas which reflect our approach to managing physical and transition risks: Decarbonisation of Operations and Value Chain (excluding investment activities); Decarbonisation of Financing and Investment Portfolios; and Climate Risk Management and Resilience.

The table below summarizes the key actions taken in 2025 under each focus area.

Focus area	Lever	Emission scope applicability	Scope (Business area)	Risk domains addressed	Time frame/frequency
1. Climate Risk Framework and Resilience	Impact and Risk Assessments	Scope 3 Category 15	Retail and Corporate lending, liquidity portfolio investment	Operational, Credit, Liquidity, Market	Annual
	Resilience analysis	Scope 3 Category 15	Retail and Corporate lending	Credit	2026–2028
2. Climate risk management of Operations	Operational Decarbonisation	Scope 1, 2, 3 category 1–14	Own operations	Operational, Reputational	2025–2027
	Stewardship and Capacity Building	Scope 1, 2, 3	Employees, Credit customers	Operational, Reputational	2025–2027
3. Climate risk management of Financing and Investment Portfolios	C&E Risk Integration into LOM	Scope 3 Category 15	Corporate and Mortgage lending	Credit	2025–2026
	Loan Portfolio Decarbonisation	Scope 3 Category 15	Mortgage and Corporate lending	Credit, Reputational	2025–2027
	Investment Activities	Scope 3 Category 15	Markets	Market, Reputational	2024
	Assets Under Management	(a)	DPM services, Pension funds	Market, Reputational	2024

- a. Emissions from Pension Funds and Discretionary Portfolio Management are excluded from our Scope 3 financed emissions inventory as these activities covers our customer investments, rather than our own investments, with Luminor acting solely in management capacity, therefore falling outside of our direct decision-making. Consequently, these activities do not meet the Scope 3 Category 15 definition "Investments" under the GHG Protocol, as they involve client-owned assets rather than investments made by Luminor.

Focus area 1 – Climate Risk Framework and Resilience

Impact and risk assessments

We assess climate and environmental risks to identify and manage physical and transition risks. We re-assessed these risks in 2025, include stress testing, and qualitative and quantitative analysis of acute physical risks, chronic changes, and transition risks over the three time horizons. The results informed our strategic decisions, risk appetite, and mitigation strategies. The processes we use to identify and assess our climate-related impacts and risks are described below in the respective sections on: 'Analysis of the impact of climate and environmental risks on our business environment' (C&E RBE), 'Materiality assessment for the impact of drivers of Climate and Environmental Risk on risk types' (C&E RMA), and are following IPCC guidance and regulatory expectations. Results are integrated into our corporate strategy and disclosed in the Sustainability Statement and Luminor Holding Pillar 3 Report 2025. Our analysis of our carbon-related assets identified corporate lending assets and business activities that may need significant efforts to become compatible with the transition to a climate-neutral economy. These are disclosed in the section 'Targets'.

Types of Climate and Environmental Risks assessed

Acute physical risks, and their consequences could damage the properties of our customers, or cause operational outages, leading to financial losses. Long-term changes in climate and environmental conditions could cause damage to property and both positive and negative fluctuations in the operational output of our customers. Transition risks may arise: in the short to medium term from new regulations on emissions and resources, or on energy efficiency; in the medium term from a shift in consumer preferences; and, in the medium to long term from the technological changes needed to adjust to a low-carbon economy which may affect existing business models and hence the financial standing of our customers. Ultimately, these risks may cause us losses if they are not assessed and mitigated promptly, or we may miss out on opportunities for financing the transition. Businesses will need to adjust their operational strategies if they want to stay resilient. The C&E RBE assessment described below screened whether our assets and business activities may be exposed to such physical or transition events. The C&E RBE and the consecutive C&E RMA identified, assessed and quantified the extent to which assets and business activities may be exposed to, and are sensitive to, the physical risk drivers or transition events identified.

Methodology and Data Sources

In 2025 we updated our methodology and analysis and concluded that Baltic countries face a similar set of principal physical and transition risks, except for environmental regulatory frameworks which differ in each country.

The 2025 C&E RBE and C&E RMA included climate-related scenario analysis, using data from various climate scenarios. The final C&E RBE assessment was based on a comprehensive review of regulations, analysis of relevant publications, and internal expertise. The severity of the impact of the drivers of physical risk and the frequency of change in them was assessed qualitatively, over various time horizons, following the regional climate projections of the Intergovernmental Panel on Climate Change (IPCC) and guidance from the IPCC Sixth Assessment Report together with the guidance notes on the IPCC Fifth Assessment Report. We assessed transitional risks using publicly available reliable data.

The data in the C&E RBE process was linked to climate scenarios through the Climate and Environmental Risk assessment (CERA) which identifies the critical areas, specific impacts, and tailored strategic responses for our operations. CERA guides our prioritisation of Climate Risk Stress Testing in the credit portfolio, and it focuses on key economic activities or risk drivers. The C&E RMA and the risk quantification processes are informed by the outcomes of the C&E RBE, and the results of the C&E RMA and the stress testing informed the development of the risk appetite metrics in our Financial Plan.

Analysis of the impact of climate and environmental risks on our business environment

In 2025, we updated our Procedure for C&E RBE analysis. This analysis has three parts; identification of climate and environmental risks, business environment scan (BES), which provides understanding of transition risks and other risks arising from various aspects of the business environment in which we operate, and the CERA, which evaluates the scale of the impact of climate and environmental risk drivers on main portfolios, economic sectors and for each Baltic country separately, and recommends risk mitigation measures by business areas and industry sectors.

In 2025 our C&E RBE assessment focused on customer lending. C&E RBE is also considered relevant for Pensions, Discretionary Portfolio Management, Treasury, and Markets because of the nature and scope of their activities and the regulations that govern

associated processes. These business areas can apply the analysis results for their area-specific assessments. We assessed the impact of climate and environmental risk drivers, separately for retail mortgages, private leasing and corporate lending over the three time horizons.

We assessed physical climate and environmental risks at NUTS3 level within a medium time horizon. The results revealed varying levels of risk across the Baltic NUTS3 regions for certain C&E risks such as river flooding or water stress, while other C&E risks, for example, heatwaves or coastal erosion were found to be the same.

The physical risks for private customers, include changing weather, coastal erosion, and soil degradation, with mitigation measures such as insurance and collateral assessments. There, we must engage in proactive risk management together with our customers, make strategic adjustments, and adhere to evolving regulatory expectations for mitigation of climate and environmental risk.

The physical and transitional risk assessment for businesses revealed different risk drivers and impacts for different economic sectors. In the short term all customers will face policy, litigation, and reputational risks and customers in several sectors will face as well include chronic and acute physical risks, which may impact financial flows and collateral. Accordingly, sectors need to be considered separately with tailored transition plans.

Risk Materiality assessment of ESG Risk Drivers impact on Risk Types

We performed an annual Risk Materiality Assessment (RMA) Process to evaluate the impact of ESG Risk Drivers on Risk Types defined in our Risk Taxonomy. This process evaluates how ESG risks may impact credit, market, liquidity, operational, compliance and other risk types using scenario analysis and expert judgment. Key risk materiality assessment criteria are financial materiality threshold and non-financial risk grid defined in our Risk Policy. More details are available in Luminor Holding Pillar 3 Report 2025.

In 2025, we expanded the RMA methodology from C&E RMA to ESG RMA, to cover not only Environmental (including Climate) Risk Drivers but also Social and Governance risk drivers in our Risk Materiality Assessment (RMA) processes. We also integrated the RMA process with DMA by mapping all identified risk outcomes from the DMA process, the IROs, to our risk taxonomy and main risk types. In 2026, we plan to further integrate DMA and RMA processes.

Resilience analysis

We evaluate the resilience of our strategy and business model to climate change for both short term capital adequacy assessment (3 years) and medium to long-term climate scenario stress testing (10-25 years). The assessment leverages on the existing ICAAP framework.

Climate risk drivers are treated as amplifiers of existing risk types and are considered under both normative and economic perspectives, including stress testing and sensitivity analysis. The results conclude that in the short term, our management buffers are adequate to absorb climate risk related shocks under different scenarios.

The long-term climate stress test, based on NGFS scenarios over 10-25+ years, assesses business model resilience, highlights more climate sensitive sectors and supports strategic portfolio steering. These scenarios assume a gradual economic transition, a shift toward lower carbon energy systems and technology deployment aligned with recognized scientific pathways. The results show that climate risk-related impacts may increase but remain manageable through ongoing transition planning and portfolio adjustments. Estimated financial effects from material climate risks, as well as mitigation actions, are incorporated into transition planning.

Focus area 2 – Decarbonisation of Operations

Operational Decarbonisation

	2024	2025
Scope 1 GHG emissions, tCO ₂ e	31.3	31.7
Scope 2 location-based GHG emissions, tCO ₂ e	2,519.3	2,749.8
Scope 2 market-based GHG emissions, tCO ₂ e	1,011.7	927.0
Scope 3 GHG emissions, tCO ₂ e (a)	1,527.7	1,281.2
Total GHG emissions, location-based, tCO ₂ e	4,078.3	4,062.7
Total GHG emissions, market-based, tCO ₂ e	2,570.7	2,239.9
tCO ₂ e operational emissions per FTE	1.02	0.86
tCO ₂ e operational emissions per FTE vs. 2021 (b)	0.87	0.68

a. The GHG Scope 3 emissions are provided for Categories 1–14, excluding Category 15.

b. The metrics represent the target established in 2021. The presented metrics do not contain emission categories that were included in the updated emission baseline in 2024 (IT equipment and employee stay in hotels during business trips) as well as category 15 emissions.

For our full carbon footprint see Note 3, Additional metrics, section 'Luminor carbon footprint'. Data Methodologies and limitations related to own operations emissions by categories are provided in the 'Methodologies', sub-section 'Own operations emissions'.

Reducing emissions is the key focus for cutting our climate impact. We made progress in 2025 on our commitment to be carbon neutral by 2050 and towards our intermediate target of halving Scope 1, 2 and 3 (category 1–14) operating emissions per employee by end of 2025. Our total own emissions in 2025 using market-based approach for Scope 2 GHG emission calculations were 2,239.9 tCO₂e, reducing our carbon emissions intensity per employee by more than 40% from 1.44 tCO₂e/FTE in 2021 to 0.86 tCO₂e/FTE in 2025. Considering our GHG emission accounting was expanded during 2024, the reduction is not fully comparable. If deducting the categories added in 2024, the emission intensity per employee reaches 0.68 tCO₂e/FTE, meaning compared to 2021 baseline –52% reduction is reached. During 2025 we established a new target for our own operational GHG emissions, aiming to reduce 42% of absolute GHG emissions (Scope 1, Scope 2, Scope 3 category 1–14) by 2030 compared to 2024 baseline.

In 2025, we continued to add more hybrid cars to our fleet to further reduce our climate impact. To reduce emissions from employee commuting, we continued to raise employees' awareness through further trainings. In addition, we continued to increase the share of renewable energy in our total electricity consumption from 70.8% to 76.2% in 2025. However, we fell short of the 100% renewable-electricity target because a significant share of our energy consumption comes from leased facilities where we do not control electricity sourcing. We continue to work with landlords to switch to renewable electricity and so increase the share of renewable energy.

Energy consumption By source	2024		2025	
	% of total	MWh	% of total	MWh
Fuel from renewable sources (a)	–	–	–	–
Purchased electricity, heat, steam, and cooling from renewable sources (a)	43.3	3,484.4	45.3	3,490.5
Self-generated non-fuel renewable energy	–	–	–	–
Renewable energy	43.3	3,484.4	45.3	3,490.5
Fossil energy	56.7	4,568.3	54.7	4,206.5
Nuclear sources	–	–	–	–
Total	100.0	8,052.7	100.0	7,696.9

a. including biomass (industrial and municipal waste of biologic origin, biogas, renewable hydrogen)

GHG removals

To remove GHG we combine hands-on employee engagement with the financing of professional peatland rewetting projects. Through our partnership with the Estonian Fund for Nature, we organised a peatland restoration day, clearing vegetation to support natural water flow and habitat recovery. We financed large-scale, peatland rewetting executed by the Peatland

Foundation, including the restoration of degraded peatland in Lithuania. This project restores hydrology, biodiversity and carbon sequestration capacity, and is expected to reduce greenhouse gas emissions by approximately 14,700 tCO₂e over a 30-year period. Part of the restoration work was completed in 2025, with the remaining activities scheduled for 2026.

Data Methodologies and limitations related to GHG removals are provided in the 'Notes to the Sustainability Statement' under the section 'Methodologies', sub-section 'GHG removals'.

Stewardship and Capacity Building

In 2025, we continued to raise customers and employee's awareness about climate change and environmental risk management, and to build resilience. Internal training included climate and environmental impacts on our business, regulatory trends, and the interconnections between climate change, biodiversity, and societal consequences. We delivered monthly ClimateFresk workshops for employees and ran tailored sessions for corporate teams focused on climate risks and upcoming transition regulations. Additionally, we facilitated ClimateFresk workshops for ESG working groups in Latvian and Estonian Banking Associations and GreenTiger in Estonia.

In 2025, we launched our first corporate customer ESG newsletter, to share insights, tools, and best practices that help businesses strengthen climate resilience and navigate the evolving sustainability landscape. To help customers build resilience to climate and environmental change, we will continue hosting seminars on how these factors impact businesses, fostering understanding and informed action and issue our customer newsletter on a regular basis...

We will continue rolling out transition planning tools, including abatement lever libraries, transition planning guidance, and initiate customer engagement for C&E risk mitigation with the support of transition advisors. Our goal is to establish dedicated customer advisory capability to: engage customers on setting and improving targets and transition plans; support Climate and Environment risk and materiality assessments; analyse ESG due diligence and risk ratings; and recommend mitigation and improvement actions. We are building the advisors' capabilities to be able to engage with customers on C&E risk and risk mitigation measures, such as transition planning, related trainings and guidance to customers. We will also continue to work with local governments and banking associations to develop solutions for local climate data and the future projections.

Further disclosures about our climate risk management practices and resilience analysis are included in Luminor Holding Pillar 3 Report 2025.

Focus area 3 – Climate risk management of Financing and Investment Portfolios

C&E Risk Integration into Loan Origination and Monitoring Processes

We follow a risk-based approach, documented in our ESG Risk Assessment Procedure. We integrate the result of the assessment into our credit decision-making process for legal entity customers. Initially we evaluate a customer's inherent environmental and climate risk level, using industry risk classification, transition risk heatmap, and existence of existing and/or historical negative ESG risk event check. For inherently high-risk customers we conduct detailed risk assessments, and residual ESG risk levels are recorded in credit documentation. We use an exclusion list to ensure compliance with sustainability and ethical standards, maintain sector-specific guidance for industries with elevated ESG risks, and apply climate risk assessments for mortgage lending, focusing on the energy efficiency performance of the collateral and assessment of flood risk.

In 2025, we enhanced the procedure for ESG risk assessments for SMEs and large corporate customers. We continued to collect climate and environmental risk data from our largest corporate customers, as part of our ESG risk rating, and gathered preliminary information about mitigation and targets for reducing environmental impacts. We also enhanced the data we collect from registers.

Looking ahead, in 2026 we plan to explore automation of customer due diligence and continue integration of climate risk assessments based on risk data into Loan Origination and Monitoring processes.

Loan Portfolio Decarbonisation

Financed emissions, tCO ₂ e	2024	2025
Mortgages	241,562	151,578
Motor vehicle loans	74,483	57,368
Corporate lending	2,584,683	2,320,517
Total	2,900,728	2,529,463

Our financed emissions decreased even as the corporate lending portfolio increased, primarily due to a reallocation toward sectors with lower emission intensity, improvements in customers' financial performance, and enhanced data availability. In the mortgages and motor vehicles portfolios, emissions declined, driven by a higher share of energy-efficient buildings and electric or hybrid vehicles, supported by continued improvements in data quality. Data methodologies and limitations are provided below.

Each year we assess the exposure of our credit portfolio to environmental risks, both transitional and physical risks using the EBRD industry classification. This assessment found high-risk assets in our portfolio that are linked to high levels of energy and emission intensity and classified 17.3% in 2025 compared to 17.9% in 2024 of our corporate loans as linked to high levels of energy and emission intensity and therefore exposed to high inherent environmental risk. In the risk assessment, loans with sustainable purpose and loans to companies owned by local governments that have committed to net zero targets and have transition plans in place are excluded from the high-risk classification, irrespective of their sectoral risk profile.

Exclusions and risk limits

To limit our exposure to high-risk customers and assets, and to support the transition of the energy sector, we have in place the exclusion list of our Sustainability Policy to exclude power generation from coal, thermal coal mining, and extraction of oil and oil shale if the company concerned has not committed to net zero by 2050 or earlier and does not have a transition plan in place, or will not make that commitment and have a transition plan within 12 months after the financing agreement is signed. In 2025, to strengthen climate and biodiversity considerations we restricted financing energy generation, and production of energy products made from peat, aligning with our biodiversity focus and peatland restoration initiatives.

We also have in place risk appetite metrics for the mortgage portfolio for financing real estate with a low energy efficiency profile and high climate risk sectors exposure.

Transition risk reduction through customer's transition planning

We continued to require our largest corporate customers operating in high Environmental risk sectors to demonstrate their actions to reduce their environmental impact by requesting them to have transition plans and where appropriate to calculate

their emissions and set targets for reducing their carbon emissions intensity as defined in our ESG Risk Assessment Procedure. We also updated our Industry ESG Risk Management Procedure, which gives industry-specific guidance on the main ESG risks and the key elements of transition planning and risk mitigation for customers active in these sectors. In 2025, new lending volume to customers in high climate-risk sectors that have transition plans in place reached 75%, short of our 90% target as customers adjusted their plans to changes in CSRD. The transitional plan definition and contextual information are disclosed in 'Climate change' section 'Targets', 'Metrics' and the 'Methodology').

In 2025, we strengthened our transition planning capabilities to support customers in adapting to a low-carbon economy. We introduced sector-specific transition plan guidelines and developed carbon abatement libraries for key industries. To deepen climate expertise, we delivered tailored training to our corporate relationship managers. Additional details about our relationship managers and customers capability building are provided in section 'Stewardship and Capacity Building'.

Steering credit financing to lower carbon facilities

We continued to offer EIB-backed financing to improve access to finance for small and medium-sized enterprises and strengthen the Baltic region's transition toward a low-carbon economy. We also continued to offer financing aligned with EBRD requirements for lower-carbon energy projects, energy-efficient real estate and development of renewable energy projects and increased by 68% compared to 2024 and reached 305.0 million EUR of financing for the period 2021-2025, reaching our 2027 target already by the end of 2025.

We increased the share of mortgage lending exposures in our portfolio that are for housing with an EPC of A or better to 32.8% in 2025 compared to 28.9% in 2024. We will continue taking additional action in 2026 to reach our emission reduction targets by financing new real estate projects classed A or higher, and by integrating environmental into our lending strategy and decision making.

We improved the availability and collection of data on mortgage collateral, like their EPC and primary energy demand. For retail lending, we identified and assessed the physical climate risks in our markets following the EU taxonomy classification, with flood, coastal erosion, heatwave and drought risks found to be the most material for real estate, and we used climate change risk maps to identify properties in areas that are at risk of acute damage from climate change.

Investment Activities

Financed emissions, tCO ₂ e	2024	2025
Listed equity and corporate bonds	113,201	615,926
Sovereign debt (a)	185,578	183,053
a. PCAF does not provide emission factors individually for Scope 1, 2, and 3 assets. On Balance sheet assets equals the gross amount Data Methodologies and limitations related to financed emissions by asset classes are provided in the 'Methodologies', sub-section 'Scope 3 - financed emissions'.		

Financed emissions for listed equity and corporate bonds increased five-fold as we increased the amount of Debt securities held, as we reshaped our excess resources, and PCAF data quality improved significantly as more companies published their actual emissions, so reducing use of proxy data. Over the coming years, we aim to strengthen internal capabilities on decarbonisation levers and target-setting methodologies to inform our target for decisions on investment related decarbonisation.

In 2025, we originated 3.2 billion EUR of new debt securities from local issuers, of which 400 million EUR were green bonds (EUGB). In our treasury portfolio, 57.9 million EUR of our fixed income assets were invested in ICMA green bond certified holdings, and 9.0 million EUR in ICMA sustainable bonds certified holdings. At year end 7.4% of our Treasury portfolio was invested in green or sustainability-linked bonds as compared to our target of 50% by 2030.

Assets Under Management

We intend to reduce the climate impact of our assets under management activities as part of our ESG targets. Our Sustainable Investment Guidelines describe how we incorporate sustainability risk (into investment decisions associated with the Discretionary Portfolio Management (DPM) and pension funds managed by Asset Management Subsidiaries.

Our DPM business continued to consider climate change a priority issue in 2025, favouring investments with better indicators on climate-related PAI considering all else is equal. As a result, we made progress with multiple climate-related PAI indicators, which are disclosed annually in the statement on principal adverse impacts of investment decisions on sustainability factors. When on-boarding new customers, we assess their sustainability preferences.

Integrating sustainability risk, is important as well for our Asset Management Subsidiaries in providing competitive 2nd and 3rd pillar pensions. The weight of instruments with environmental or social characteristics in the aggregate assets of pension funds increased in 2025 from 33% to 36%. To reduce the climate impact of our investment activities, we have started to prioritise instruments based on their climate-related PAI, focusing on the GHG gas intensity PAI, considering all else is equal. Our approach to climate-related PAI will be reflected in the sustainability related disclosures of each Asset Management Subsidiary for 2025.

To cater to the preferences of clients, we offer pension funds which invest solely in SFDR Article 8 investment funds, which promote ESG characteristics. These investment funds invest in companies with high ESG ratings with the aim to narrow the investable universe down to market capitalisation coverage of 25% within each sector ("best-in-class" approach), at the same time significantly reducing investments in the fossil fuel sector and in companies involved in controversial activities.

OTHER

Data Methodologies and limitations:

For our assessment of greenhouse gas emissions, we used operational control boundaries as per the GHG protocol and market practice, with no significant changes to emissions accounting inventory scope as compared to previous year. We excluded non-material categories (e.g., upstream/downstream transportation, franchises, end-of-life product treatment), because of limited use of products, limited significance to our operations, or limited estimated significance on the total emission. Our Scope 3 inventory includes emissions from paper use (Category 1), IT equipment (Category 2), waste generated (Category 5), business travel (Category 6), and employee commuting (Category 7). Additionally, we are calculating emissions for Category 15 related to lending products and investments.

The categories excluded from our GHG emission baseline are:

Category	Explanation
3	Not material, due to low purchasing quantity of 5 tons of back up emergency diesel every 5 years.
4, 9	We are not organising any upstream or downstream transportation or distribution of our sold products.
8, 13	Upstream and downstream leased assets are included within respective Scope 1 or 2 emission accounting, aligning our GHG emission accounting to financial control boundaries.
10, 11, 12	Our sold products impact is accounted within Scope 3 Category 15.
14	We have no Franchises within its operations.

Own operations emissions

To evaluate the performance and effectiveness of climate change related impact risks and opportunities in our own operations, we measure our carbon footprint in tCO₂e, calculated as per our Instruction for Luminor Own Emission Data Collection. We assess the accuracy of own emission sustainability reporting data as reasonable based on the sources used for estimations. Our data and calculations are validated by our external assurance provided according to limited assurance scope.

To calculate our Scope 1 emissions, we used Republic of Estonia's GHG emission footprint calculator for organisations, using average emission factors for fuels used. For Scope 2 emission calculations in location-based calculations and market-based calculations, where no contractual instruments are in place, we use the Association of Issuing Bodies (AIB) emission factors for electricity and heat energy.

The energy consumption data we report is based on invoices we receive from the landlords of our facilities, some of which use square metres of floor space to approximate our share of total heat energy or electricity consumption. In 2025, no external solution was used to manage our energy consumption data. Energy consumption is an aggregate of the electricity and heating energy that we use in our facilities. Electricity consumption is reported to us in units of energy consumed. In some facilities, where heat energy consumption as units of energy consumed is not provided in the invoices, we calculate the heat energy consumption from the monetary value invoiced and monthly heat energy tariff in the respective municipality.

We have renewable energy contracts with renewable energy certificates of origin as contractual instruments in place for purchased electricity. The contractual instruments cover 73.6% of electricity emissions and 66.3% of total energy related (Scope 2) emissions. For heat energy we do not have any contractual instruments in place.

Scope 3 emissions are calculated for material categories as per the assessment we made at the end of 2023. Most of the Scope 3 emissions are calculated using primary data, such as travelled distance, purchased amount (pieces) or weight. Where such data is not available, spend-based estimations are applied. For estimation of employee commuting, we extrapolate data received from questionnaires to cover all employees, using country averages, with adjustments made for time away from the office. Additionally, if the respondent has said, that during 2025 they were out of office for more than 6 weeks, it was assumed that the time spent out of office was 10 weeks

For various Scope 3 emissions – generated waste (category 5), business travel (category 6) related to employee transportation, where service provider data is not available, and for hotel stays, employee commute (category 7) – we use average country emission factors developed by the Republic of Estonia. Scope 3 financed emissions (Category 15) are calculated according to

the PCAF methodology, including PCAF provided emission factor data base. For paper use (category 1) GHG emission estimations we use emission factors for Baltic countries provided by Climatiq.

For emissions calculated for IT equipment (category 2) manufacturer emission reports were used, deducting the use phase emissions provided in the manufacturer emission report. Where such emission reports are not available, we apply spend-based emission estimations. During 2025 we improved data accuracy for the emissions accruing from purchased IT equipment.

For the waste amount estimations for Lithuania, we apply waste weight per employee from Latvia. In Estonia precise waste amounts are provided for

The primary data used for the Scope 1 emissions in 2024 and 2025 made up 100%, and for Scope 2 it made 100.0% in both years. For Scope 3 primary data use made up 59.6%, excluding Category 15, while in 2025 primary data use for Scope 3 made up 64.0%, excluding Category 15.

GHG removals

We use the MoorFutures standard to quantify greenhouse gas (GHG) removals and calculate reduction in emissions. The standard is designed for projects that rewet drained peatlands in the temperate climate zone, The MoorFutures methodology has been adjusted for Baltic conditions by the Foundation for Peatland Restoration and Conservation and uses a forward-looking baseline scenario to estimate emissions reductions from peatland rewetting projects.

Emissions in the project scenario are calculated from the expected changes in water levels and vegetation using the GEST approach or other approved quantification methods. Potential carbon sinks are excluded and a methane peak after rewetting is included. Data limitations include the challenge of accurately estimating nitrous oxide emissions and peat depletion rates over long time horizons. This is addressed by excluding nitrous oxide and excluding areas where peat is projected to deplete within 100 years. The approach is designed overall to provide a robust but conservative quantification of the climate benefits from peatland restoration. Laboratory of Flora and Geobotany has performed an evaluation of the rewetted peatland conditions and the restoration measures.

The Foundation for Peatland Restoration and Conservation reports the emissions removed to us on an annual basis. There is no additional external validation.

Scope 3 – financed emissions

We use PCAF methodology for calculating financed emissions. PCAF methodology has been developed and is being used by multiple industries, there are flaws that require workarounds such as missing emissions factors for various asset types. We have included all absolute financed emissions for all relevant asset classes or sectors covered in PCAF Plan A and justified any exclusions.

Motor vehicles financed emissions

Motor vehicle finance emissions cover vehicles from corporate and private customers and include collaterals with an engine that can be driven, flown, or sailed, but exclude collaterals that are considered as machinery but not considered as movable property. All vehicles GHG emissions data is based on PCAF emissions factors and average kilometres driven data. No actual data for GHG emissions has been used in this calculation. Rather, we have made the following assumptions: we use the PCAF database where if a vehicle doesn't wholly match a type provided by PCAF, it is mapped to the closest possible type considering way of transportation and approximate engine size; and, for kilometres driven an average of kilometres driven, from national statistics, is used. For more specialised vehicles national statistics are extrapolated should they be unavailable.

We used proxies for motor vehicles financed emissions: Emission factor may come from multiple sources; PCAF emission factors were provided for the majority of motor vehicles based on their fuel type and/or model and manufacturer; additional emission factors are estimated for Railway transport, airplanes and vessels, for which PCAF database doesn't provide an emission factor. Vehicle loans financed emissions of on-balance sheet assets do not reconcile with financial reporting as financed emissions includes only drivable vehicles. In addition, on-balance sheet assets may have double entries caused by duplicate entries for vehicles in registries.

The resulting accuracy of sustainability reporting data for motor vehicles financed emissions can be assessed reasonable based on the type of data and sources used for the estimations (vehicle model and manufacturer, average distance travelled, country and vehicle type). In the future, we plan to use actual emissions based on the extracts from local vehicle registries and rely on the gradual improvement of the vehicle type data in the registries and national statistics.

Mortgage portfolio financed emissions

Our mortgage portfolio EPC rating is based on mapping immovable collateral to PCAF database using collateral type mapping. If we were not able to map collateral to the database, we exclude the contract from EPC reporting and added to the 'business loans' financed emissions calculation. In the majority of cases this includes machinery and equipment mortgages. For collaterals with real or estimated EPC rating, financed emissions are calculated based on PCAF quality score 3 using the EPC rating to align emission factor.

We make the following assumptions for mortgage financed emissions: for collateral types available in our systems, in case they do not match fully with the types available in PCAF database, we implemented a manual collateral mapping; and immovable properties that should not be emitting any GHG emissions, such as plots of land we exclude from the mapping.

We used the following proxies for mortgage financed emissions: All GHG emission factors are provided from PCAF database; EPC ratings are sourced from external registries, when data is noted down as 'Real' EPC rating or is estimated based on a collateral's year of construction or reconstruction and noted down as 'Estimated' EPC rating; if PCAF score 5 is calculated, and when the size in square meters of property is not available, we use collateral type dwelling and assume that 1 collateral is being financed.

Mortgage loans financed emissions on-balance sheet assets does not reconcile with financial reporting due, in the main to methodological differences relating to collateral allocations and typology. Several loans may be backed by several collaterals, of which some collaterals do not classify for emissions accounting such as land plots or non-heated buildings such as garages.

The resulting accuracy of sustainability reporting data for mortgage portfolio's financed emissions has been assessed 'sufficient' based on the sources used for the emission factor estimations and collateral type information in banking systems. We aim to improve the data accuracy by updating missing data elements to ensure required data availability for the existing portfolio in the banking systems in all three Baltic countries.

Corporate lending financed emissions

Emissions calculations for corporate lending includes business loans of all corporate customers, excluding Motor vehicles which are included in Motor vehicles asset class calculations.

Financed emissions calculations for business loans depend on collateral type. For business loans secured by commercial real estate, collateral financed emissions are calculated based on real or estimated EPC data, if it is not available, emissions are calculated as per PCAF standard describing quality scores 4 and 5, basing calculations on immovable property's floor area or dwelling year. Commercial real-estate collaterals are selected based on preselected collateral types that have been mapped to PCAF provided collateral type list. If commercial real estate does not comply with the preselected collateral type list, financed emissions are calculated as per business loans requirements. For business loans financed emissions calculations depend on financial information availability, NACE code, and country of jurisdiction. On business loans level PCAF uses Exiobase segregation that directly can be correlated to industry NACE codes. For some of industry NACE codes PCAF emission factors for Baltics were missing. As a result, emissions for a non-material part of corporate portfolio have not been calculated. Additionally, for NACE Code D.35.30, more generic sector emissions factors have been used following PCAF recommendation.

Corporate loans financed emissions on-balance sheet assets does not reconcile with financial reporting as financed emissions reporting excludes guarantees and cash cards (as methodology is not provided by PCAF) and bonds. Emissions include types of leasing other than vehicle leasing (which is accounted for under the vehicle financed emissions).

The resulting accuracy of sustainability reporting data for corporate portfolio's financed emissions has been assessed sufficient based on the sources used for the emission factors, collateral type information and companies' financial data availability in banking systems. We plan to improve the data accuracy by working together with the local banking associations to increase the

coverage of the primary energy demand and EPC data of buildings in local registries. The data quality is also expected to improve gradually as we plan to collect more data from companies published CSRD reports and our ESG data collection questionnaires on real emissions.

Listed and unlisted equity and corporate bonds

The unlisted bonds and equity asset class includes all on-balance sheet equity investments in businesses, non-profits, and any other structure of organisation that are not traded on a market and are for general corporate purposes. Calculations for financed emission were made according to PCAF data quality score 5 requirements. With limited data about emissions for scopes 1, 2 and 3, the emissions were calculated using our exposure and emission factors provided by the PCAF emission factor database. Since the database lacked data on emission factors for emissions divided by assets for a sector, we used PCAF method 3c to calculate financed emissions.

The listed bonds asset class includes all on-balance sheet listed corporate bonds that are traded on a market and are for general corporate purposes. Financed emissions for the absolute Scope 1 and 2 and financed emissions of Scope 3 were calculated according to PCAF data quality score 1 requirements, using the data from latest available consolidated annual reports of the financed company. GHG emissions data was available, but in some cases enterprise value including cash (EVIC) had to be calculated or substituted with appropriate value. The substitutions were made using available data on market capitalisation, equity and liabilities, income statements or other available financial data found in the consolidated annual financial report. Data for all calculations came from the financed companies latest consolidated annual report, either 2025 or if unavailable then from 2024 or 2023.

The resulting accuracy of sustainability reporting data can be assessed sufficient based on the sources used for the emission and companies consolidated financial reports.

Sovereign debt

This asset class includes sovereign bonds and sovereign loans issued in domestic or foreign currencies. Financed emissions are calculated based on PCAF Plan A standard according to data quality Score 1 or Score 2 requirements. Source for GDP_PPP is World Bank Group and for the GHG emissions UN data from Greenhouse Gas Inventory Data. PCAF does not provide emission factors individually for Scope 1, 2, and 3 of the assets and therefore only aggregate total emissions have been disclosed.

The resulting accuracy of sustainability reporting data can be assessed sufficient based on the sources used for the emission factors. Currently, we do not have any plans to improve the data quality and look forward to the gradual improvement of the emission factors by the UN.

Biodiversity and ecosystems

Our primary exposure to biodiversity-related risks stems from financed activities and suppliers operating in or near biodiversity-sensitive areas such as Natura 2000 sites or peatland ecosystems. These activities may lead to degradation of natural habitats and disturbance of protected species, particularly in designated conservation zones. Sectors such as agriculture and forestry present elevated risks due to their dependence on ecosystem services and use of inputs. Conversely, we operate exclusively from facilities located in urban areas. The Exploring Natural Capital Opportunities, Risks and Exposure (ENCORE) and Key Biodiversity Areas mapping of our facilities gave low or very low materiality assessment ratings, meaning our own operations do not have material biodiversity impacts or do not affect areas that are sensitive for biodiversity.

IMPACTS, RISKS, AND OPPORTUNITIES

Biodiversity and ecosystems (direct impact drivers of biodiversity loss)

Material topic / IRO description	Expected time horizon	Affected
Material impacts to environment and/or people		
(-) Actual negative impact on biodiversity, marine resource degradation and pollution through financing certain sectors such as forestry or agriculture, whose practices lead to methane emissions and leakage of fertilizers and other pollutants into air and water bodies.	All	Nature
Material financial risks and opportunities		
(-) Risk of financial losses due to credit default of customers dependent on biodiversity. If biodiversity declines, these companies may struggle to operate and repay their loans.	Long term	Shareholders, Investors Creditors

In 2025, we advanced how we identify and assess actual and potential impacts on biodiversity and ecosystems across our own operations and value chain. Building on our work in 2024 we implemented the Partnership for Biodiversity Accounting Financials (PBAF) Standard to guide a more structured and decision-useful assessment.

For our value chain, we conducted a portfolio-wide screening of biodiversity dependencies and impacts, with a focus on sectors with high nature-related risk dependencies such as agriculture and forestry, with an analysis of ecosystem service dependencies, such as water, soil, and pollination, and pressures such as land use change, pollution, and resource extraction. The Analysis of Impact of C&E RBE in 2025, supported this by evaluating environmental risks across the three time horizons.

Subject matter experts and material topic owners used these insights to define and assess biodiversity-related IROs, as documented in the sections Double Materiality Assessment (DMA) and Sustainability Reporting Processes and stakeholder perspectives were integrated through our engagement activities, detailed in the section Stakeholder Engagement.

Our criteria for assessing IROs are described in the section 'IRO Assessment and Sustainability Reporting Processes' and include ecosystem services that have been, or may be, disrupted. Transition and physical risks related to biodiversity and ecosystems have been identified and assessed in scope of the C&E RBE. We assess systemic biodiversity and ecosystem risks using the ENCORE database, which highlights potential large-scale disruptions to ecosystem services such as soil degradation. We evaluate these risks for their potential financial impact and complement this with ClimCycle data and sector-level biodiversity impact metrics to identify cross-sector vulnerabilities and systemic exposure.

POLICIES

Biodiversity-related material impacts, risks, and opportunities were identified across our own operations, suppliers, and financed activities in scope of the 2025 DMA and the process confirmed the continued materiality of biodiversity. Our existing policies and due diligence processes are used to address and manage the material biodiversity-related IROs. Our commitment to biodiversity protection is embedded in our Sustainability Policy and operationalised through the ESG Due Diligence Standard. Material biodiversity impacts are addressed via ESG due diligence processes, including the ESG Risk Assessment Procedure. These processes consider risks such as proximity to protected areas, species disturbance, and ecosystem degradation. Risk treatment mechanisms – such as avoidance, mitigation, or engagement – are defined accordingly and supported by ESG risk assessment questionnaires and adverse media screening tools, which flag biodiversity-related controversies during enhanced

due diligence. These measures integrate biodiversity considerations into credit decisions, supplier engagement, and sustainability reporting.

In addition, our policies apply exclusion rules to prevent harm to high conservation value areas, differentiate between physical and transition risks, and address sustainable land use and regenerative agriculture practices. The policies require risk assessments and transition plans for high-risk sectors. In 2025, we added deforestation risk minimisation to our Sustainability policy and intend in 2026 to integrate deforestation provisions into our due diligence processes. A further description of the policies is provided in section 'Our policies, procedure and standards' of the 'Notes to the sustainability statement'.

TARGETS

Biodiversity target setting is planned once data quality and methodologies are sufficiently mature. An action plan for target setting and biodiversity risk management with 2026 milestones is embedded in our Climate and Environmental Transition Plan. In 2025, we started to assess nature dependencies to establish a baseline and explore ways to reduce impacts and resource dependencies across operations and customers by 2028.

We finalized the biodiversity impact assessment at the end of 2025 and initiated a focused analysis of key impact metrics to guide future monitoring, with particular attention to agriculture and forestry sectors where biodiversity considerations are critical.

In 2024, we committed to establishing quantified biodiversity targets once robust data on our dependencies and impacts became available. While we made progress in understanding these dimensions in 2025, we did not set formal targets due to the need for greater confidence in data quality and methodologies, as well as the development of processes to monitor and influence biodiversity impacts – particularly at loan origination and monitoring stages. We will revisit target setting once further maturity is achieved in these areas.

In 2026, we plan to review the integration of biodiversity considerations in credit decision-making. This includes enhancing due diligence tools with biodiversity-related questions and developing nature-related risk and impact indicators for portfolio-level insights. In addition, we aim to engage in knowledge building activities for our customers, especially those operating in the agriculture sector.

ACTIONS

In 2025, we advanced our understanding of nature related impacts and dependencies and integrated additional nature-related risk drivers into our risk assessment processes – the Analysis of Climate and Environmental risks on our business environment for lending portfolios and the DMA process. We analysed the requirements of nature impacts and dependencies accounting methodology of PBAF standard and performed the related analysis of our loan portfolio using the ENCORE database. This analysis identified material dependencies and pressures on ecosystem services, particularly within the agriculture sector, and confirmed that biodiversity-related risks – especially those linked to crop and animal production – meet the materiality threshold defined in our Risk Policy and Risk Management Framework. We finalised the biodiversity impact assessment and initiated an analysis of key impact metrics to guide future monitoring efforts, with particular attention to agriculture and forestry sectors.

In 2025, we developed sector one-pagers based on our Industry ESG risk management procedure, which provides agriculture-specific ESG risk guidance for Relationship Managers, including activity based environmental risk levels (e.g., livestock farming) and expectations for mitigation such as reduced fertiliser use, regenerative farming practices and soil and water stewardship, ensures that biodiversity impacts and risks are systematically assessed and addressed through client engagement and credit decisions applying risk based approach. In addition, we developed transition guidelines for agriculture sector that Relationship Managers can use in their discussions with the customers to guide them in transition planning.

We integrated the biodiversity related commitments and actions into our Climate and Environmental Transition plan including the integration of additional questions into the agriculture sector specific due diligence tool.

Capacity-building continued via Climate Fresk and biodiversity-specific training for Relationship Managers to helping build foundational understanding of climate and environmental interconnections and reinforce practical application of biodiversity drivers in lending. Externally, we supported the Northern Roots conference to help agricultural clients transition to regenerative practices and build resilience to nature-related risks. To reduce our impact on the environment and sensitise our employees to biodiversity risks and to deepen understanding of ecosystem services, we engaged employees in wetland restoration in Asupi (Matsalu National Park, Estonia); a similar restoration initiative is planned in Lithuania in 2026.

Transition plan on biodiversity and ecosystems

We strengthened our Climate and Environment Transition Plan by integrating biodiversity-related physical, transition, and systemic risks. Our biodiversity risks resilience is assessed through the inclusion of biodiversity in our DMA, ESG Risk Assessment Procedure, and sector-level analysis using ENCORE data. We quantified nature-related dependencies across sub-sectors and evaluated potential financial risks, including reputational impacts stemming from biodiversity loss. These insights inform our strategy, risk limits, and follow-up actions, as outlined in the "Climate Change" chapter. In our 2025 DMA, nature was considered a silent stakeholder, and biodiversity-related IRO assessments were guided by scientific literature and sectoral publications. Stakeholder involvement is detailed in the "Stakeholder Engagement" section, which explains how external perspectives were incorporated into the identification and assessment process. Our resilience analysis focuses on financial materiality across our lending and investment portfolios. It is conducted through two core processes: the Analysis of Impact of C&E RBE, which covers all customer segments, and the DMA, which includes in portfolio assessment and quantification analysis both retail mortgage and corporate lending portfolios as well as investment and pensions portfolios. Risks and opportunities related to biodiversity and ecosystems are assessed for lending portfolio at sector level using ENCORE data. Impacts and risks from own operations are deemed immaterial.

Resource use and circular economy

PROGRESS AND UPDATES SINCE LAST REPORT

Resource use and circular economy topic is not material for the current reporting period, and information is provided for context, continuity and transparency purposes only. Efficient resource use and the transition toward circular business models remain important themes in the broader sustainability landscape. While circularity principles, such as waste reduction, reuse, and responsible product design, continue to support long-term decarbonisation and resilience, their direct financial materiality within our own operations remains limited due to our service-based, non-resource-intensive business model. However, circularity measures are increasingly relevant in the context of our financing activities.

As part of our commitment to decarbonising the loan portfolio and achieving net zero by 2050, we recognise the role of circular economy principles in strengthening client resilience and supporting the shift toward more sustainable business models. We will continue to monitor developments in this area and integrate relevant practices where they support our broader sustainability objectives.

SOCIAL INFORMATION

Customers and end users

Our strategy and business model are aligned with our commitment to meet the evolving needs of and provide value to our customers which we manage by customer segment.– We are here to improve the financial health of our customers and our home markets, and to support their growth, to ensure mutual success and long-term sustainability by ensuring our value proposition relevance to our customers. We have dedicated customer service roles in place to strengthen our customer relationships, understand customer needs and increase customer satisfaction.

Our strategy recognises that specific customer segments have unique needs. To younger customers, we promote financial literacy and responsible decision-making, for older customers we provide non-digital access to our service supported by consultations, while for customers with disabilities, we provide enhanced accessibility to our facilities and digital offerings.

IMPACTS, RISKS AND OPPORTUNITIES

Consumers and end users (Social inclusion of consumers and or end users)

Material topic/ IRO description	Expected time horizon	Affected
Material financial risks and opportunities		
(–) Risk of financial underperformance due to failure to deliver a competitive digital value proposition to retail customers, resulting in customer attrition. This may stem from misalignment between digital offerings and the evolving expectations.	All	Shareholders, Investors, Creditors

To address this risk and ensure our digital value proposition remains competitive and aligned with customer expectations, we apply a comprehensive approach to customer satisfaction, service quality, and responsible product design.

We prioritise customer satisfaction and build trust through service quality and fair treatment. Our customer service roles are designed to understand customer needs and strengthen relationships through personalised communication. Quality assessments and outreach to dormant customers help increase satisfaction, reduce complaints, and identify opportunities to improve our value proposition. We continue to invest in IT scalability, maintain transparent communication during complaint investigations, and align service level agreements with guidance from local regulators. Our commitment to inclusive and sustainable growth also includes setting impact metrics, forming partnerships, and engaging employees in community initiatives.

Our approach to communicating customer banking offers is rooted in transparency and ethical practices. We tailor banking products and offers to meet the needs and preferences of different customers while also promoting sustainable and responsible banking solutions. By adhering to industry best practices, we can foster trust and long-term relationships with our clients, helping make the financial services more sustainable. We also integrate customer feedback into our IT organisation on an ongoing basis, seeking to improve the general customer experience.

POLICIES

We focus on transparency, accountability, and remediation to ensure an ethical and customer-oriented approach. We strive to satisfy our customers, as well as respect their fundamental human rights by providing fair and honest treatment that does not discriminate and offering good service.

We manage material impacts of our products on customers through our Sustainability Policy, which promotes adherence to the UN Guiding Principles on Business and Human Rights, OECD Guidelines, and ILO standards. We identify following human rights topics relevant to customers (right to information, right to equality & non-discrimination, right to effective remedy and right to protection from harmful business impacts) and uphold their rights to clear and accurate information through personalized, multi-channel communication, timely updates on legal terms and pricing, and responsiveness to inquiries. Advanced feedback mechanisms help us tailor engagement strategies to evolving needs.

Our Luminor guide to a memorable customer experience (“the Guide”) requires offers to be based on customer needs, supported by daily service quality assessments to notice early signs of lack of competence, and act accordingly. Lending

practices consider affordability and risk tolerance, guided by the Lending Risk Parameters for Private Individuals Procedure. We raise our customers awareness of financial literacy by providing regular newsletters covering such topics as fraud schemes, pension funds' performance, and financial market overviews.

We strive to make our services accessible to all customers without discrimination and ensure fair treatment. Our Code of Conduct defines core values, while the Guide sets professional requirements for employees, including support for customers with special needs, reinforced through regular training. The Guide was updated during 2025 to enhance accessibility related provisions, before assisting, adaptive communication style and allowing extra time.

We ensure customers' right to remedy through the Customer Complaints, Feedback and Requests Handling Procedure, which we updated in 2025 to improve definitions and resolution timing. After a customer submits a complaint, we notify them immediately that we will respond within 15 calendar days. The employee responsible for handling the complaint evaluates the situation, gathers all issue-related information, and provides a solution to the customer, including compensation if applicable. Feedback is used to mitigate negative outcomes from process deficiencies, human error, fraud attempts, or technical incidents.

Following our ESG Due Diligence Standard, we address human rights in customer operations through a risk-based approach in our due diligence process. For large corporate clients in high-risk industries, we use questionnaires to assess social and governance risks, and compliance with international standards. Results inform mitigation capacity and residual risk, which are documented and considered in credit decisions.

TARGETS

We have established targets, metrics and actions to address the identified material IROs. The metrics established reflect key factors such as customer satisfaction, transparency, accountability, and remediation, which collectively drive the quality of customer relationships. All the targets are reviewed as part of our annual strategy review process in engagement with all relevant internal stakeholders.

Targets and metrics	Target year	Target	2024	2025
Customer Net Promoter Score – Transactional (Retail)	2025	+50	+55	+56
Customer Net Promoter Score – Relational (Group)	2025	+12	+14	+24
Customer complaints caused by human error (Retail), y-o-y change, % (a)	2025	-10	-36	-67
Customers who Felt Heard, %	-	-	91	91
Customers Reporting a Great Service Experience with Advisors, %	-	-	95	95

- a. This metric tracks the reduction of complaints resulting from mistakes in customer service and operational processes for our private and corporate customers across the Baltics. It reflects our commitment to minimizing negative impacts on customers and improving service quality through continuous process enhancements. Progress is tracked monthly and reported quarterly to the Board, with insights shared with product and process development teams and customer service units to prevent recurring issues.

ACTIONS

The relevance of our operations to customers is ensured and evaluated through continuous engagement with them. We engage with customers and stakeholders in a number of ways including regular satisfaction surveys, mystery shopping, focus groups, and our annual ESG Business Materiality Assessment Insights from these engagements are integrated into decision-making to ensure our products and services remain accessible, responsive, and aligned with customer needs.

We consistently measure customer satisfaction to follow up our quality of services, to capture all early signals of imperfections and to collect call to actions for improvements. Both retail and corporate customer satisfaction is measured through NPS surveys, complemented by Customer Satisfaction Score (CSAT) and sentiment tracking for digital channels. Customers are invited to provide feedback on their overall experience in our biannual NPS survey, from which we calculate a NPS score. Throughout the year, customers also provide feedback on their most recent interaction, from which we calculate the transactional NPS score. Our Customer Experience Unit follows up with customers who gave an NPS score between 0 and 8 to

understand their experience and address any unresolved issues. We continued to focus on service quality and personalised communication. Mystery shopping and updated service standards improved transactional NPS.

In 2025, we tracked effectiveness through feedback surveys, and improved consultations and engagement. We are continuing to improve the quality of our consultation through regular quality assessments and proactive engagement with dormant customers, and by keeping relationships balanced from the risk perspective and understanding how to create more value from banking with us. We ran dedicated training of the Guide, with a focusing on customer retention, professionalism, and CRM usage.

We improved our service quality and hence our customer relationships using mystery shoppers and updated service guidelines to enhance personal experience across channels. Annual independent Service quality survey of financial sector recorded higher ratings of our sales and onsite service consultation channels. We expanded quality assessments to all channels, with weekly measurements and regular reporting. An annual ESG business materiality assessment also supports our customer service strategy described in the section 'General disclosures'.

Due to competitive and commercial sensitivity, the disclosure intentionally focuses on high-level actions and processes rather than detailed descriptions of digital functionalities or implementation specifics.

To identify what action is needed and appropriate in response to identified risk we apply a continuous, multi-channel assessment process described above. Using mystery shoppers and customer satisfaction tools we are able to identify customer emerging needs and tackle early signs of customer experience and to initiate the activities for improvements. In addition, during the year we enhanced our offerings by adding new functionalities and products. We also updated our complaint-handling procedures in 2025. Operational risk reports now include data on complaints requesting financial compensation to identify root causes and implement mitigation plans. We are improving the efficiency of our IT systems in 2026. We improved our communication with customers during complaint investigations by implementing service level agreements and providing interim notifications. We maintain close cooperation with local regulators and follow their recommendations. The outcomes of these processes are systematically integrated into decision-making to determine improvements to our digital and physical accessibility, update service standards, enhance product functionalities, refine consultation quality, strengthen complaint-handling procedures, and inform targeted customer communication.

In 2025, we continued the implementation of the action plan to improve digital and physical accessibility and executed trainings. Following a third-party accessibility audit, we implemented improvements to ensure better accessibility across our digital channels. To improve customer experience, we analysed the customer feedback from NPS surveys and customer complaints. The identified gaps in customer experience in digital channels were addressed both in 2025 and will be part of our plans for further improvements 2026.

Own Workforce

PROGRESS AND UPDATES SINCE LAST REPORT

We assessed that the Own Workforce topic is not material this year. Nevertheless, we maintained our established practices and continued to monitor selected workforce-related metrics, including diversity, engagement, and pay equity.

No new targets, key performance indicators or quantitative disclosures were introduced for the Own Workforce topic this year. Any references to workforce related matters are provided for contextual and continuity purposes only and should not be interpreted as indicating material impacts, risks or opportunities under ESRS for the reporting period.

GOVERNANCE INFORMATION

PROGRESS AND UPDATES SINCE LAST REPORT

Business conduct

Business conduct topic is not material for the current reporting period, and information is provided for context, continuity and transparency purposes only. Our Code of Conduct continues to set clear expectations for ethical behaviour, supported by internal controls and ESG due diligence applied to all new third parties. We also reassess regularly key partners to ensure alignment with our principles and mitigate conduct-related risks. In 2025, we introduced new Whistleblowing procedure and Speak-up procedure. We continue to enforce international sanctions, prevent financial crime, and uphold zero tolerance for bribery and corruption.

Our services remain focused on the Baltic region, and we maintain transparency through customer due diligence. While politically neutral, we engage in industry associations to support responsible business practices. These ongoing efforts reflect our dedication to integrity, accountability, and regulatory compliance.

Business model resilience

Business model resilience topic is not material for the current reporting period, and information is provided for context, continuity and transparency purposes only. We continue to ensure the sustainability and adaptability of our business model through our strategy, risk management and sustainability frameworks. Our three-year financial plan – developed across business and risk functions, reviewed annually, and approved by the Council – is aligned with our risk appetite and financial targets, including climate targets.

We manage business model risk by continuously evaluating market conditions, geopolitical developments, and performance. ESG considerations are integrated into strategic planning through our DMAs and climate and environmental risk assessments. For all material ESG-related risks and the related impacts, transition plans are established. Progress on strategy implementation and transition plans is monitored via KPIs, with quarterly reviews by the management bodies. These efforts are supported by dedicated operational resources and reflect our commitment to long-term resilience and responsible growth.

Cybersecurity

Cybersecurity topic is not material for the current reporting period, and information is provided for context, continuity and transparency purposes only. We continue to implement our three-year cybersecurity strategy built around zero-tolerance for critical incidents, zero-trust network architecture, and cloud-based defences. Our 24-hour Security Operations Centre is supported by incident response playbooks and post-incident reviews. Third-party risks are managed through onboarding assessments, contractual obligations, and periodic audits. To maintain security, we have invested in technologies – while redundancy and backup systems ensure service continuity.

Our commitment to customer data protection includes independent Data Protection Officers, comprehensive training programs, and ongoing GDPR compliance monitoring. Key performance indicators such as cybersecurity training completion rates, incident detection and response times, and third-party security assessments are tracked and aligned with the NIST Cybersecurity Framework and DORA regulations. In 2025, we refined our privacy and cybersecurity practices, expanded resilience testing, and adapted to evolving legal interpretations of GDPR.

NOTES TO THE SUSTAINABILITY STATEMENT

1. EU Taxonomy tables

Template 0. Summary of KPIs to be disclosed by credit institutions under Article 8 Taxonomy Regulation

KPI status	KPI	Total exposure to Taxonomy aligned activities (currency) €m		KPI (%)		% coverage (over total assets) (a) (%)	Non-assessed exposures (% of covered assets) (b) (%)	
		Turnover-based	CapEx-based	Turnover-based	CapEx-based		Turnover-based	CapEx-based
31 December 2024								
Main	Green asset ratio (GAR) stock	403.8	415.2	5.9	6.1	42.9	2.5	2.5
Additional	GAR (flow)	65.4	65.6	5.5	5.5	21.5	3.9	3.9
	Trading book	NA	NA	NA	NA	NA	NA	NA
	Financial guarantees	-	-	-	-	NA	-	-
	Assets under management (c)	NA	NA	NA	NA	NA	100.0	100.0
	Fees and commissions income (d)	NA	NA	NA	NA	NA	NA	NA
31 December 2025								
Main	Green asset ratio (GAR) stock	441.0	461.9	5.8	6.1	47.3	3.5	3.5
Additional	GAR (flow)	82.2	84.7	4.4	4.5	31.6	9.0	9.0
	Trading book	NA	NA	NA	NA	NA	NA	NA
	Financial guarantees	-	-	-	-	NA	-	-
	Assets under management (c)	NA	NA	NA	NA	NA	100.0	100.0
	Fees and commissions income (d)	NA	NA	NA	NA	NA	NA	NA

a. % of assets covered by the KPI over banks' total assets;

b. In accordance with Article 7(8) of the Disclosure Delegated Act;

c. AUM was not assessed due to non-materiality in accordance with Article 4, paragraph 1f of the Disclosure Delegated Act;

d. Fee and commission income from services other than lending and AuM.

Template 1. Assets for the calculation of GAR stock based on Turnover KPI

Stock, €m 31 December 2025		Total gross carrying amount	o/w Taxonomy- eligible	o/w Taxonomy- aligned	Breakdown Climate Change Mitigation (CCM)
1	GAR – Covered assets in both numerator and denominator	7,577.4	6,475.8	441.0	441.0
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	7,577.4	6,475.8	441.0	441.0
3	Financial undertakings	352.5	164.3	13.7	13.6
4	Loans and advances	15.2	12.7	1.4	1.4
5	Debt securities, including UoP	337.3	151.6	12.2	12.2
6	Equity instruments	-	-	-	-
7	Non-financial undertakings	228.8	45.3	2.2	2.2
8	Loans and advances	214.4	39.0	1.9	1.9
9	Debt securities, including UoP	8.4	5.1	0.2	0.2
10	Equity instruments	6.1	1.2	0.1	0.1
11	Households	6,730.7	6,266.3	425.1	425.1
12	of which loans collateralised by residential immovable property	5,966.2	5,966.2	425.1	425.1
13	of which building renovation loans	30.1	30.1	-	-
14	of which motor vehicle loans	491.6	270.0	-	-
15	Local governments financing	265.4	-	-	-
16	Housing financing	53.4	-	-	-
17	Other local government financing	211.9	-	-	-
18	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-
19	Exposures included on a voluntary basis (c)	-	-	-	-
20	Total GAR assets	7,577.4			
21	Assets not covered for GAR calculation	8,431.4			
22	Central governments and Supranational issuers	1,710.8			
23	Central banks exposure	1,928.9			
24	Trading book	13.8			
25	Undertaking and entities not subject to CSRD	4,414.0			
26	SMEs and undertakings (other than SMEs) not subject to CSRD disclosure obligations	4,403.7			
27	Loans and advances	4,352.9			
28	of which loans collateralised by residential immovable property	2,589.8			
29	of which building renovation loans	-			
30	Debt securities, including UoP	46.6			
31	Equity instruments	4.2			
32	Non-EU country counterparties not subject to CSRD disclosure obligations	10.3			
33	Loans and advances	9.1			
34	Debt securities, including UoP	1.2			
35	Equity instruments	-			
36	Derivatives	57.9			
37	On demand interbank loans	55.5			
38	Cash and cash-related assets	120.0			
39	Other categories of assets (e.g., Goodwill, commodities etc.)	130.5			
40	Total assets	16,008.9			
Off-balance sheet exposures (stock) to Undertakings subject to CSRD disclosure obligations and local governments					
41	Financial guarantees	4.3	-	-	-
42	Assets under management	2,806.4	-	-	-
43	Of which debt securities	815.5	-	-	-
44	Of which equity instruments	1,991.0	-	-	-

a. In accordance with Article 7(8)(a) and (b) of this Regulation; b. In accordance with Article 4(1a) of this Regulation; c. In accordance with Article 7(3) of this Regulation.

Template 1. Assets for the calculation of GAR stock based on Turnover KPI (continued)

per environmental objective					o/w Use of Proceeds	o/w transitional	o/w enabling	Non-assessed exposures	o/w financing non-material activities of counterparties (a)	o/w exposures financing counterparties reporting in accordance with Article 7(9)	o/w not assessed considered non-material by the credit institution (b)
Climate Change Adaptation (CCA)	Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and Ecosystems (BIO)							
0.0	0.0	0.0	0.0	-	425.1	1.5	1.0	265.4	-	-	265.4
0.0	0.0	0.0	0.0	-	425.1	1.5	1.0	265.4	-	-	265.4
0.0	0.0	0.0	0.0	-	-	0.4	0.3	-	-	-	-
0.0	-	0.0	0.0	-	-	0.0	0.0	-	-	-	-
0.0	0.0	0.0	0.0	-	-	0.4	0.2	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-
0.0	-	-	-	-	-	1.1	0.7	-	-	-	-
0.0	-	-	-	-	-	1.1	0.6	-	-	-	-
-	-	-	-	-	-	-	0.1	-	-	-	-
0.0	-	-	-	-	-	0.0	0.0	-	-	-	-
-	-	-	-	-	425.1	-	-	-	-	-	-
-	-	-	-	-	425.1	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	265.4	-	-	265.4
-	-	-	-	-	-	-	-	53.4	-	-	53.4
-	-	-	-	-	-	-	-	211.9	-	-	211.9
-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	265.4	-	-	265.4
-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	2,806.4	-	-	2,806.4
-	-	-	-	-	-	-	-	815.5	-	-	815.5
-	-	-	-	-	-	-	-	1,991.0	-	-	1,991.0

Template 1. Assets for the calculation of GAR stock based on CapEx KPI

Stock, €m 31 December 2025		Total gross carrying amount	o/w Taxonomy- eligible	o/w Taxonomy- aligned	Breakdown Climate Change Mitigation (CCM)
1	GAR – Covered assets in both numerator and denominator	7,577.4	6,516.8	461.9	460.0
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	7,577.4	6,516.8	461.9	460.0
3	Financial undertakings	352.5	164.7	14.1	14.1
4	Loans and advances	15.2	12.7	1.4	1.4
5	Debt securities, including UoP	337.3	152.0	12.7	12.7
6	Equity instruments	-	-	-	-
7	Non-financial undertakings	228.8	85.8	22.6	20.8
8	Loans and advances	214.4	76.6	19.8	8
9	Debt securities, including UoP	8.4	8.1	2.8	9
10	Equity instruments	6.1	1.2	0.1	10
11	Households	6,730.7	6,266.3	425.1	11
12	of which loans collateralised by residential immovable property	5,966.2	5,966.2	425.1	12
13	of which building renovation loans	30.1	30.1	-	13
14	of which motor vehicle loans	491.6	270.0	-	14
15	Local governments financing	265.4	-	-	-
16	Housing financing	53.4	-	-	-
17	Other local government financing	211.9	-	-	-
18	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-
19	Exposures included on a voluntary basis (c)	-	-	-	-
20	Total GAR assets	7,577.4			
21	Assets not covered for GAR calculation	8,431.4			
22	Central governments and Supranational issuers	1,710.8			
23	Central banks exposure	1,928.9			
24	Trading book	13.8			
25	Undertaking and entities not subject to CSRD	4,414.0			
26	SMEs and undertakings (other than SMEs) not subject to CSRD disclosure obligations	4,403.7			
27	Loans and advances	4,352.9			
28	of which loans collateralised by residential immovable property	2,589.8			
29	of which building renovation loans	-			
30	Debt securities, including UoP	46.6			
31	Equity instruments	4.2			
32	Non-EU country counterparties not subject to CSRD disclosure obligations	10.3			
33	Loans and advances	9.1			
34	Debt securities, including UoP	1.2			
35	Equity instruments	-			
36	Derivatives	57.9			
37	On demand interbank loans	55.5			
38	Cash and cash-related assets	120.0			
39	Other categories of assets (e.g., Goodwill, commodities etc.)	130.5			
40	Total assets	16,008.9			
Off-balance sheet exposures (stock) to Undertakings subject to CSRD disclosure obligations and local governments					
41	Financial guarantees	4.3	-	-	-
42	Assets under management	2,806.4	-	-	-
43	Of which debt securities	815.5	-	-	-
44	Of which equity instruments	1,991.0	-	-	-

See footnotes in the table above (Template 1. Assets for the calculation of GAR stock based on Turnover KPI).

Template 1. Assets for the calculation of GAR stock based on CapEx KPI (continued)

per environmental objective					o/w Use of Proceeds	o/w transitional	o/w enabling	Non-assessed exposures	o/w financing non-material activities of counterparties (a)	o/w exposures financing counterparties reporting in accordance with Article 7(9)	o/w not assessed considered non-material by the credit institution (b)
Climate Change Adaptation (CCA)	Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and Ecosystems (BIO)							
0.3	1.6	0.0	0.0	-	427.4	17.7	2.3	265.4	-	-	265.4
0.3	1.6	0.0	0.0	-	427.4	17.7	2.3	265.4	-	-	265.4
0.0	0.0	0.0	0.0	-	-	0.4	0.4	-	-	-	-
0.0	-	0.0	0.0	-	-	0.0	0.0	-	-	-	-
0.0	0.0	0.0	0.0	-	-	0.4	0.4	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-
0.2	1.6	-	-	-	2.3	17.3	2.0	-	-	-	-
0.2	-	-	-	-	-	17.3	1.8	-	-	-	-
-	1.6	-	-	-	2.3	-	0.2	-	-	-	-
0.0	-	-	-	-	-	0.0	0.0	-	-	-	-
-	-	-	-	-	425.1	-	-	-	-	-	-
-	-	-	-	-	425.1	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	265.4	-	-	265.4
-	-	-	-	-	-	-	-	53.4	-	-	53.4
-	-	-	-	-	-	-	-	211.9	-	-	211.9
-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	265.4	-	-	265.4
-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	2,806.4	-	-	2,806.4
-	-	-	-	-	-	-	-	815.5	-	-	815.5
-	-	-	-	-	-	-	-	1,991.0	-	-	1,991.0

Template 1. Assets for the calculation of GAR flow based on Turnover KPI

Flow, €m 31 December 2025		Total gross carrying amount	o/w Taxonomy- eligible	o/w Taxonomy- aligned	Breakdown Climate Change Mitigation (CCM)
1	GAR – Covered assets in both numerator and denominator	1,863.3	1,381.5	82.2	82.2
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	1,863.3	1,381.5	82.2	82.2
3	Financial undertakings	177.2	85.6	8.2	8.2
4	Loans and advances	15.0	12.6	1.4	1.4
5	Debt securities, including UoP	162.2	73.0	6.8	6.8
6	Equity instruments	-	-	-	-
7	Non-financial undertakings	32.0	1.2	0.1	0.1
8	Loans and advances	29.7	1.2	0.1	0.1
9	Debt securities, including UoP	2.3	-	-	-
10	Equity instruments	-	-	-	-
11	Households	1,486.9	1,294.7	73.9	73.9
12	of which loans collateralised by residential immovable property	1,160.2	1,160.2	73.9	73.9
13	of which building renovation loans	12.3	12.3	-	-
14	of which motor vehicle loans	214.0	122.1	-	-
15	Local governments financing	167.1	-	-	-
16	Housing financing	32.0	-	-	-
17	Other local government financing	135.1	-	-	-
18	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-
19	Exposures included on a voluntary basis (c)	-	-	-	-
20	Total GAR assets	1,863.3			
21	Assets not covered for GAR calculation	4,029.5			
22	Central governments and Supranational issuers	163.4			
23	Central banks exposure	1,556.2			
24	Trading book	6.2			
25	Undertaking and entities not subject to CSRD	2,282.0			
26	SMEs and undertakings (other than SMEs) not subject to CSRD disclosure obligations	2,282.0			
27	Loans and advances	2,237.2			
28	of which loans collateralised by residential immovable property	860.6			
29	of which building renovation loans	-			
30	Debt securities, including UoP	44.7			
31	Equity instruments	0.1			
32	Non-EU country counterparties not subject to CSRD disclosure obligations	-			
33	Loans and advances	-			
34	Debt securities, including UoP	-			
35	Equity instruments	-			
36	Derivatives	21.6			
37	On demand interbank loans	0.1			
38	Cash and cash-related assets	-			
39	Other categories of assets (e.g., Goodwill, commodities etc.)	-			
40	Total assets	5,892.8			
Off-balance sheet exposures (flow) to Undertakings subject to CSRD disclosure obligations and local governments					
41	Financial guarantees	0.9	-	-	-
42	Assets under management	2,806.4	-	-	-
43	Of which debt securities	815.5	-	-	-
44	Of which equity instruments	1,991.0	-	-	-

a. In accordance with Article 7(8)(a) and (b) of this Regulation; b. In accordance with Article 4(1a) of this Regulation; c. In accordance with Article 7(3) of this Regulation; d. AUM was not assessed
Only includes exposures with an outstanding gross carrying amount on 31 December 2025. For 2025, certain types of assets (e.g., goodwill, and commodities) have been excluded from the GAR

Template 1. Assets for the calculation of GAR flow based on Turnover KPI (continued)

[illegible]

due to non-materiality in accordance with Article 4, paragraph 1f of the Disclosure Delegated Act. The reported flow gross carrying amount corresponds to the total stock gross carrying amount.
KPI flow reporting due to unavailability of data at the start of the reporting period.

Template 1. Assets for the calculation of GAR flow based on CapEx KPI

Flow, €m 31 December 2025		Total gross carrying amount	o/w Taxonomy- eligible	o/w Taxonomy- aligned	Breakdown Climate Change Mitigation (CCM)
1	GAR – Covered assets in both numerator and denominator	1,863.3	1,383.9	84.7	83.0
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	1,863.3	1,383.9	84.7	83.0
3	Financial undertakings	177.2	85.7	8.3	8.3
4	Loans and advances	15.0	12.6	1.4	1.4
5	Debt securities, including UoP	162.2	73.1	6.9	6.9
6	Equity instruments	-	-	-	-
7	Non-financial undertakings	32.0	3.5	2.4	0.8
8	Loans and advances	29.7	1.2	0.1	0.1
9	Debt securities, including UoP	2.3	2.3	2.3	0.7
10	Equity instruments	-	-	-	-
11	Households	1,486.9	1,294.7	73.9	73.9
12	of which loans collateralised by residential immovable property	1,160.2	1,160.2	73.9	73.9
13	of which building renovation loans	12.3	12.3	-	-
14	of which motor vehicle loans	214.0	122.1	-	-
15	Local governments financing	167.1	-	-	-
16	Housing financing	32.0	-	-	-
17	Other local government financing	135.1	-	-	-
18	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-
19	Exposures included on a voluntary basis (c)	-	-	-	-
20	Total GAR assets	1,863.3			
21	Assets not covered for GAR calculation	4,029.5			
22	Central governments and Supranational issuers	163.4			
23	Central banks exposure	1,556.2			
24	Trading book	6.2			
25	Undertaking and entities not subject to CSRD	2,282.0			
26	SMEs and undertakings (other than SMEs) not subject to CSRD disclosure obligations	2,282.0			
27	Loans and advances	2,237.2			
28	of which loans collateralised by residential immovable property	860.6			
29	of which building renovation loans	-			
30	Debt securities, including UoP	44.7			
31	Equity instruments	0.1			
32	Non-EU country counterparties not subject to CSRD disclosure obligations	-			
33	Loans and advances	-			
34	Debt securities, including UoP	-			
35	Equity instruments	-			
36	Derivatives	21.6			
37	On demand interbank loans	0.1			
38	Cash and cash-related assets	-			
39	Other categories of assets (e.g., Goodwill, commodities etc.)	-			
40	Total assets	5,892.8			
Off-balance sheet exposures (flow) to Undertakings subject to CSRD disclosure obligations and local governments					
41	Financial guarantees	0.9	-	-	-
42	Assets under management	2,806.4	-	-	-
43	Of which debt securities	815.5	-	-	-
44	Of which equity instruments	1,991.0	-	-	-

See footnotes in the table above (Template 1. Assets for the calculation of GAR flow based on Turnover KPI).

Template 1. Assets for the calculation of GAR flow based on CapEx (continued)

[illegible]

Template 2. GAR sector information based on Turnover KPI

	Breakdown by sector NACE 4-digit level (code and label) €m 31 December 2025	Total (gross) carrying amount	Of which Taxonomy- eligible	Of which Taxonomy- aligned	Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)	Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and Ecosystems (BIO)
1	D.35.12	25.6	24.9	-	-	-	-	-	-	-
2	N.77.11	24.1	4.7	0.4	0.4	-	-	-	-	-
3	F.42.11	11.5	2.2	0.0	0.0	-	-	-	-	-
4	L.68.20	5.9	5.3	-	-	-	-	-	-	-
5	D.35.11	1.5	-	-	-	-	-	-	-	-
6	F.41.20	0.1	0.1	-	-	-	-	-	-	-
7	F.42.22	0.0	0.0	-	-	-	-	-	-	-
11	Nuclear activities (a, b)	313.6	15.3	15.1						
12	Fossil gas activities (a, b)	320.4	0.3	0.0						
13	Of which non-assessed exposures	-								

- a. Template 2 has been compiled by treating the sector-based breakdown and the breakdown by nuclear and fossil gas activities as separate exercises. Consequently, within the nuclear and fossil gas sections, all CSRD-relevant exposures have been included, irrespective of their NACE code.
- b. For Items 11 and 12, double counting may occur for gross carrying amount. When an exposure contributes to both Taxonomy activities (nuclear activities and fossil gas activities), the full exposure amount is reported under each item, resulting in the same exposure being counted in both lines.
- The table represents only exposures to counterparties active in sectors covered by the EU Taxonomy (i.e., in case the sector NACE code could be associated to Taxonomy activity).

Template 3. GAR KPI stock based on Turnover KPI

% (compared to corresponding total covered assets in the denominator)		Taxonomy-eligible (a)	Taxonomy-aligned (b)	Breakdown per environ-	
31 December 2025				Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)
1	GAR - Covered assets in both numerator and denominator	85.5	5.8	5.8	0.0
2	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	85.5	5.8	5.8	0.0
3	Financial undertakings (only NFRD)	46.6	3.9	3.9	0.0
4	Loans and advances	83.6	9.3	9.3	0.0
5	Debt securities, including UoP	44.9	3.6	3.6	0.0
6	Equity instruments	-	-	-	-
7	Non-financial undertakings (only NFRD)	19.8	1.0	1.0	0.0
8	Loans and advances	18.2	0.9	0.9	0.0
9	Debt securities, including UoP	61.1	2.2	2.2	-
10	Equity instruments	19.7	1.7	1.7	0.0
11	Households	93.1	6.3	6.3	-
12	of which loans collateralised by residential immovable property	100.0	7.1	7.1	-
13	of which building renovation loans	100.0	-	-	-
14	of which motor vehicle loans	54.9	-	-	
15	Local governments financing	-	-	-	-
16	Housing financing	-	-	-	-
17	Other local government financing	-	-	-	-
18	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-
19	Exposures included on a voluntary basis (d)	-	-	-	-
20	Total GAR assets	85.5	5.8	5.8	0.0

- a. The percentage in this column represents the proportion of taxonomy-eligible assets over the gross carrying amount of the respective asset type.
- b. The percentage in this column represents the proportion of taxonomy-aligned assets over the gross carrying amount of the respective asset type.
- c. In accordance with Article 7(8)(a) and (b) of this Regulation.
- d. In accordance with Article 7(3) of this Regulation.

Template 2. GAR sector information based on CapEx KPI

	Breakdown by sector NACE 4-digit level (code and label) €m 31 December 2025	Total (gross) carrying amount	Of which Taxonomy- eligible	Of which Taxonomy- aligned	Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)	Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and Ecosystems (BIO)
1	D.35.12	25.6	24.9	-	-	-	-	-	-	-
2	N.77.11	24.1	4.8	0.5	0.5	-	-	-	-	-
3	F.42.11	11.5	2.2	0.0	0.0	-	-	-	-	-
4	L.68.20	5.9	5.3	-	-	-	-	-	-	-
5	D.35.11	1.5	-	-	-	-	-	-	-	-
6	F.41.20	0.1	0.1	-	-	-	-	-	-	-
7	F.42.22	0.0	0.0	-	-	-	-	-	-	-
11	Nuclear activities (a, b)	313.6	5.1	5.1						
12	Fossil gas activities (a, b)	320.4	0.3	0.0						
13	Of which non-assessed exposures	-								

See footnotes in the table on the left (Template 2. GAR sector information based on Turnover KPI).

Template 3. GAR KPI stock based on Turnover KPI (continued)

mental objective				Proportion of Taxonomy aligned in Taxonomy eligible			Non-assessed exposures (c)
Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and Ecosystems (BIO)	o/w Use of Proceeds	o/w transitional	o/w enabling	
0.0	0.0	0.0	-	5.6	0.0	0.0	3.5
0.0	0.0	0.0	-	5.6	0.0	0.0	3.5
0.0	0.0	0.0	-	-	0.1	0.1	-
-	0.0	0.0	-	-	0.0	0.0	-
0.0	0.0	0.0	-	-	0.1	0.1	-
-	-	-	-		-	-	-
-	-	-	-	-	0.5	0.3	-
-	-	-	-	-	0.5	0.3	-
-	-	-	-	-	-	1.7	-
-	-	-	-		0.1	0.1	-
	-			6.3	-	-	-
	-			7.1	-	-	-
	-			-	-	-	-
	-			-	-	-	-
-	-	-	-	-	-	-	100.0
	-			-	-	-	100.0
-	-	-	-	-	-	-	100.0
	-			-	-	-	-
	-			-	-	-	-
0.0	0.0	0.0	-	5.6	0.0	0.0	3.5

Template 3. GAR KPI stock based on CapEx KPI

% (compared to corresponding total covered assets in the denominator)		Taxonomy-eligible (a)	Taxonomy-aligned (b)	Breakdown per environ-	
31 December 2025				Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)
1	GAR – Covered assets in both numerator and denominator	86.0	6.1	6.1	0.0
2	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	86.0	6.1	6.1	0.0
3	Financial undertakings (only NFRD)	46.7	4.0	4.0	0.0
4	Loans and advances	83.6	9.4	9.4	0.0
5	Debt securities, including UoP	45.1	3.8	3.8	0.0
6	Equity instruments	-	-	-	-
7	Non-financial undertakings (only NFRD)	37.5	9.9	9.1	0.1
8	Loans and advances	35.7	9.2	9.1	0.1
9	Debt securities, including UoP	96.4	33.0	13.8	-
10	Equity instruments	19.9	1.9	1.9	0.0
11	Households	93.1	6.3	6.3	-
12	of which loans collateralised by residential immovable property	100.0	7.1	7.1	-
13	of which building renovation loans	100.0	-	-	-
14	of which motor vehicle loans	54.9	-	-	
15	Local governments financing	-	-	-	-
16	Housing financing	-	-	-	-
17	Other local government financing	-	-	-	-
18	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-
19	Exposures included on a voluntary basis (d)	-	-	-	-
20	Total GAR assets	86.0	6.1	6.1	0.0

See footnotes in the table above (Template 3. GAR KPI stock based on Turnover KPI).

Template 3. GAR KPI stock based on CapEx KPI (continued)

Environmental objective				o/w Use of Proceeds	o/w transitional	o/w enabling	Proportion of Taxonomy aligned in Taxonomy eligible	Non- assessed exposures (c)
Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and Ecosystems (BIO)					
0.0	0.0	0.0	-	5.6	0.2	0.0	7.1	3.5
0.0	0.0	0.0	-	5.6	0.2	0.0	7.1	3.5
0.0	0.0	0.0	-	-	0.1	0.1	8.6	-
-	0.0	0.0	-	-	0.0	0.1	11.2	-
0.0	0.0	0.0	-	-	0.1	0.1	8.4	-
-	-	-	-	-	-	-	-	-
0.7	-	-	-	1.0	7.5	0.9	26.4	-
-	-	-	-	-	8.1	0.8	25.8	-
19.2	-	-	-	27.9	-	2.3	34.2	-
-	-	-	-	-	0.1	0.2	9.4	-
-	-	-	-	6.3	-	-	6.8	-
-	-	-	-	7.1	-	-	7.1	-
-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	100.0
-	-	-	-	-	-	-	-	100.0
-	-	-	-	-	-	-	-	100.0
-	-	-	-	-	-	-	-	-
0.0	0.0	0.0	-	5.6	0.2	0.0	7.1	3.5

Template 3. GAR KPI flow based on Turnover KPI

% (compared to corresponding total covered assets in the denominator) 31 December 2025		Taxonomy-eligible (a)	Taxonomy-aligned (b)	Breakdown per environ-	
				Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)
1	GAR – Covered assets in both numerator and denominator	74.1	4.4	4.4	0.0
2	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	74.1	4.4	4.4	0.0
3	Financial undertakings (only NFRD)	48.3	4.6	4.6	0.0
4	Loans and advances	84.1	9.4	9.4	0.0
5	Debt securities, including UoP	45.0	4.2	4.2	0.0
6	Equity instruments	-	-	-	-
7	Non-financial undertakings (only NFRD)	3.7	0.2	0.2	0.0
8	Loans and advances	4.0	0.2	0.2	0.0
9	Debt securities, including UoP	-	-	-	-
10	Equity instruments	-	-	-	-
11	Households	87.1	5.0	5.0	-
12	of which loans collateralised by residential immovable property	100.0	6.4	6.4	-
13	of which building renovation loans	100.0	-	-	-
14	of which motor vehicle loans	57.1	-	-	-
15	Local governments financing	-	-	-	-
16	Housing financing	-	-	-	-
17	Other local government financing	-	-	-	-
18	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-
19	Exposures included on a voluntary basis (d)	-	-	-	-
20	Total GAR assets	74.1	4.4	4.4	0.0

a. The percentage in this column represents the proportion of taxonomy-eligible assets over the gross carrying amount of the respective asset type.

b. The percentage in this column represents the proportion of taxonomy-aligned assets over the gross carrying amount of the respective asset type

c. In accordance with Article 7(8)(a) and (b) of this Regulation.

d. In accordance with Article 7(3) of this Regulation.

Only includes exposures with an outstanding gross carrying amount on 31 December 2025. For 2025, certain types of assets (e.g., goodwill, and commodities) have been excluded from the GAR KPI flow reporting due to unavailability of data at the start of the reporting period.

Template 3. GAR KPI flow based on Turnover KPI (continued)

Environmental objective				o/w Use of Proceeds	o/w transitional	o/w enabling	Proportion of Taxonomy aligned in Taxonomy eligible	Non- assessed exposures (c)
Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and Ecosystems (BIO)					
0.0	0.0	0.0	-	4.0	0.0	0.0	5.9	9.0
0.0	0.0	0.0	-	4.0	0.0	0.0	5.9	9.0
0.0	0.0	0.0	-	0.1	0.0	0.0	9.5	-
-	-	-	-	-	0.0	0.0	11.2	-
0.0	0.0	0.0	-	0.1	0.0	0.0	9.3	-
-	-	-	-	-	-	-	-	-
-	-	-	-	-	0.0	0.0	5.7	-
-	-	-	-	-	0.0	0.0	5.7	-
-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-
-	-	-	-	5.0	-	-	5.7	-
-	-	-	-	6.4	-	-	6.4	-
-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	100.0
-	-	-	-	-	-	-	-	100.0
-	-	-	-	-	-	-	-	100.0
-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-
0.0	0.0	0.0	-	4.0	0.0	0.0	5.9	9.0

Template 3. GAR KPI flow based on CapEx KPI

% (compared to corresponding total covered assets in the denominator)		Taxonomy-eligible (a)	Taxonomy-aligned (b)	Breakdown per environ-	
31 December 2025				Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)
1	GAR – Covered assets in both numerator and denominator	74.3	4.5	4.5	0.0
2	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	74.3	4.5	4.5	0.0
3	Financial undertakings (only NFRD)	48.4	4.7	4.7	0.0
4	Loans and advances	84.1	9.4	9.4	0.0
5	Debt securities, including UoP	45.1	4.3	4.2	0.0
6	Equity instruments	-	-	-	-
7	Non-financial undertakings (only NFRD)	11.0	7.5	2.5	0.0
8	Loans and advances	4.0	0.3	0.3	0.0
9	Debt securities, including UoP	100.0	100.0	31.0	-
10	Equity instruments	-	-	-	-
11	Households	87.1	5.0	5.0	-
12	of which loans collateralised by residential immovable property	100.0	6.4	6.4	-
13	of which building renovation loans	100.0	-	-	-
14	of which motor vehicle loans	57.1	-	-	-
15	Local governments financing	-	-	-	-
16	Housing financing	-	-	-	-
17	Other local government financing	-	-	-	-
18	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-
19	Exposures included on a voluntary basis (d)	-	-	-	-
20	Total GAR assets	74.3	4.5	4.5	0.0

See footnotes in the table above (Template 3. GAR KPI flow based on Turnover KPI).

Template 3. GAR KPI flow based on CapEx KPI (continued)

Environmental objective				o/w Use of Proceeds	o/w transitional	o/w enabling	Proportion of Taxonomy aligned in Taxonomy eligible	Non- assessed exposures (c)
Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and Ecosystems (BIO)					
0.1	0.0	0.0	-	4.1	0.0	0.0	6.1	9.0
0.1	0.0	0.0	-	4.1	0.0	0.0	6.1	9.0
0.0	0.0	0.0	-	0.1	0.1	0.1	9.7	-
-	-	-	-	-	0.0	0.1	11.2	-
0.0	0.0	0.0	-	0.1	0.1	0.1	9.4	-
-	-	-	-	-	-	-	-	-
5.0	-	-	-	7.2	0.0	0.0	68.1	-
-	-	-	-	-	0.0	0.0	6.3	-
69.0	-	-	-	100.0	-	-	100.0	-
-	-	-	-	-	-	-	-	-
-	-	-	-	5.0	-	-	5.7	-
-	-	-	-	6.4	-	-	6.4	-
-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	100.0
-	-	-	-	-	-	-	-	100.0
-	-	-	-	-	-	-	-	100.0
-	-	-	-	-	-	-	-	-
0.1	0.0	0.0	-	4.1	0.0	0.0	6.1	9.0

Template 5. KPI off-balance sheet exposures based on Turnover KPI

31 December 2025		Taxonomy eligible	Taxonomy aligned	Breakdown per environmental objective					
				Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)	Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and Ecosystems (BIO)
1	Financial guarantees (FinGuar KPI)	-	-	-	-	-	-	-	-
2	Assets under management (AuM KPI) (a)	NA	NA	NA	NA	NA	NA	NA	NA

a. AUM was not assessed due to non-materiality in accordance with Article 4, paragraph 1f of the Disclosure Delegated Act.

This table provides information on assets under management activities performed by Asset Management Subsidiaries that manage pension funds, and our Discretionary Portfolio Management service.

Template 5. KPI off-balance sheet exposures based on CapEx KPI

31 December 2025		Taxonomy eligible	Taxonomy aligned	Breakdown per environmental objective					
				Climate Change Mitigation (CCM)	Climate Change Adaptation (CCA)	Water and marine resources (WTR)	Circular economy (CE)	Pollution (PPC)	Biodiversity and Ecosystems (BIO)
1	Financial guarantees (FinGuar KPI)	-	-	-	-	-	-	-	
2	Assets under management (AuM KPI) (a)	NA	NA	NA	NA	NA	NA	NA	

See footnotes in the table above (Template 5. KPI off-balance sheet exposures based on Turnover KPI).

Template 5. KPI off-balance sheet exposures based on Turnover KPI (continued)

o/w Use of Proceeds	o/w transitional	o/w enabling	Non assessed exposures (1)
-	-	-	-
NA	NA	NA	2,806.4

Template 5. KPI off-balance sheet exposures based on CapEx KPI (continued)

o/w Use of Proceeds	o/w transitional	o/w enabling	Non assessed exposures (1)
-	-	-	-
NA	NA	NA	2,806.4

2. Explanation of negative assessment

ESRS E2 POLLUTION

We have assessed a comprehensive list of IROs related to Pollution as part of the current Double Materiality Assessment (DMA) and concluded that this topic is not material for Luminor. This conclusion is based on the application of ESRS materiality criteria to the Luminor's actual and potential impacts, risks and opportunities.

The IROs assessed cover our own operations, our suppliers and customers, and risks of financing companies that contribute to air and water pollution, including hazardous waste generation, chemical discharge, and eutrophication of the Baltic Sea; credit risk from clients in high-pollution sectors such as mining, chemicals, and shipping; and opportunities to increase revenue by financing pollution mitigation technologies and circular economy solutions. Pollution to air was assessed separately within DMA and deemed non-material because CO₂ emissions are already addressed under the material topic of Climate Change, while other air emissions (e.g., methane, nitrous oxide, fluorinated gases) were assessed as not giving rise to material impacts or financial risks for Luminor, and are mitigated by customers operating under strict EU regulations, as well as requirement under our ESG risk assessment process for high-risk clients to establish transition plans.

Certain subtopics were assessed and not identified as material, as they do not give rise to material impacts, risks or opportunities in relation to Luminor's business model. These include pollution of living organisms and food resources, substances of concern, substances of very high concern, and microplastics. Luminor does not engage in activities introducing persistent pollutants, and indirect exposures are managed through ESG risk screening and sustainable procurement standards, making standalone assessments duplicative and non-decision-useful.

The bank operates within the Baltic region under robust EU regulatory frameworks governing chemical safety, water quality, and pollution prevention. ESG credit screening, portfolio diversification, and governance practices further support the mitigation of residual risks. Potential impacts and opportunities are indirect, gradual, and misaligned with Luminor's core portfolio, with no evidence of systemic incidents or financial effects exceeding materiality thresholds. Considering these factors, pollution-related ESRS topics do not meet the criteria for materiality under the impact, risk, and opportunity perspective.

ESRS E3 WATER AND MARINE RESOURCES

Water and marine resource topics were assessed as part of the current DMA and concluded to be not material for Luminor. This conclusion is based on the application of ESRS materiality criteria to the Luminor's actual and potential impacts, risks and opportunities.

Our water use is limited to standard office and data centre needs, with negligible withdrawals and routine discharges managed through municipal systems. We have no processes generating significant wastewater, no coastal facilities, and no interaction with marine environments, making ocean discharges and marine resource extraction irrelevant based on the assessment of related impacts, risks and opportunities.

Potential indirect exposure through financing clients in sectors with higher water or marine risks, such as agriculture or aquaculture, were also assessed under the DMA. These exposures are limited to the Baltic region and subject to robust EU regulatory frameworks, contributing to immateriality conclusion. Water stress in the Baltics is currently low and projected to remain moderate in the short and medium term, while marine-based economic activity within the portfolio is minimal. Opportunities to finance water-efficient technologies or sustainable marine practices exist but remain niche and misaligned with strategic priorities. Considering the negligible direct impacts, constrained indirect exposures, and absence of systemic incidents or financial effects exceeding materiality thresholds, ESRS E3 topics do not meet the criteria for materiality under the impact, risk, and opportunity perspective.

ESRS S1 OWN WORKFORCE

Own workforce topics under ESRS S1 were assessed as part of the current DMA and concluded to be not material for Luminor. This conclusion is based on the application of ESRS materiality criteria to the Luminor's actual and potential impacts, risks and opportunities.

Subtopics such as secure employment, working time, adequate wages, health and safety, work-life balance, diversity, gender equality, inclusion of persons with disabilities, training and skills development, and measures against workplace violence were analysed in detail. While these areas are important for employee well-being, they are comprehensively addressed through Luminor's internal governance frameworks and Baltic labour laws, leaving no residual risk or variability. Existing practices, such as competitive compensation, diversity programs, health and safety measures, and grievance mechanisms, are embedded in operations and supported by monitoring tools. Given Luminor's business model focused on retail and corporate banking, workforce factors do not materially influence core financial drivers, and the likelihood of significant financial or societal impact remains low.

Other work-related rights, including child labour, forced labour, adequate housing, and privacy were assessed under the DMA and not identified as material, as they do not give rise to material impacts, risks or opportunities in relation to Luminor's operating model. All employees are verified against national minimum-age requirements during recruitment, labour laws prohibit any form of forced work, and Luminor does not provide housing benefits. Privacy risks are managed through established data protection governance and controls and are governed by strict EU and national data protection regulations. Considering these conditions and the absence of systemic incidents or financial effects exceeding materiality thresholds, ESRS S1 topics do not meet the criteria for materiality under the impact, risk, and opportunity perspective.

ESRS S2 WORKERS IN THE VALUE CHAIN

Workers in the value chain topics under ESRS S2 were assessed as part of the current DMA and concluded to be not material for Luminor. This conclusion is based on the application of ESRS materiality criteria to the Luminor's actual and potential impacts, risks and opportunities.

Subtopics such as secure employment, working time, adequate wages, health and safety, social dialogue, freedom of association, collective bargaining, diversity, and work-life balance were analyzed. While these issues are important for fair labour practices, Luminor's value-chain counterparties predominantly operate in sectors such as IT, consultancy, and administrative services rather than high-risk industries. As a result, the likelihood of systemic harm or significant financial impact related to these subtopics was assessed as very low. Additionally, these are comprehensively regulated and enforced within the Baltic region.

Other work-related rights, including child labor, forced labor, adequate housing, and water and sanitation are not identified as material. The nature of services provided by suppliers does not involve housing or sanitation arrangements, and no exposures associated with these risks were identified. Our suppliers and vendors are subject to strict EU labor standards, any possible indirect exposure is limited to the Baltic region and governed by robust regulatory frameworks. Considering these conditions and the absence of identified incidents or financial effects exceeding materiality thresholds, ESRS S2 topics do not meet the criteria for materiality under the impact, risk, and opportunity perspective.

ESRS S3 AFFECTED COMMUNITIES

The affected communities topics under ESRS S3 were assessed as part of the current DMA and concluded to be not material for Luminor. This conclusion is based on the application of ESRS materiality criteria to the Luminor's actual and potential impacts, risks and opportunities.

The analysis focused on security-related impacts and potential risks from financing large-scale infrastructure projects, which could lead to displacement or degradation of living spaces. These risks are minimal given Luminor's portfolio, which is concentrated in mortgages, SME lending, and corporate banking in urban areas, with no strategic focus on rural development or large-scale projects. Opportunities such as financing housing cooperatives or regional development were also considered but remain niche and misaligned with Luminor's core business model.

Other subtopics, including adequate housing, food, water and sanitation, land-related impacts, civil and political rights, and the rights of indigenous peoples, were assessed under the DMA and not identified as material. Luminor does not finance sectors typically associated with these risks, nor does it operate in jurisdictions with indigenous communities or elevated systemic human-rights risks. Additionally, these are comprehensively safeguarded by strong legal and regulatory frameworks in the Baltic region. Considering the negligible direct impacts, limited indirect exposure, and absence of systemic incidents or financial

effects exceeding materiality thresholds, ESRS S3 topics do not meet the criteria for materiality under the impact, risk, and opportunity perspective.

ESRS G1 BUSINESS CONDUCT

Business conduct topics under ESRS G1 were assessed as part of the current DMA and concluded to be not material for Luminor. This conclusion is based on the application of ESRS materiality criteria to the Luminor's actual and potential impacts, risks and opportunities.

The analysis covered risks such as poor corporate culture affecting employee engagement, conflicts of interest in product distribution, corruption and bribery, financial crime, insider information misuse, and regulatory compliance failures. Opportunities related to positive supervisory outcomes and policy engagement were also considered. While these issues are important for effective governance, they are managed through established internal policies, controls, and oversight mechanisms embedded in day-to-day operations. Existing measures, including whistleblower channels, internal audits, compliance monitoring, and risk-culture programmes, contribute to the mitigation of identified risks. No evidence of systemic misconduct or financial effects exceeding ESRS materiality thresholds was identified.

Animal welfare was assessed as not material because it is irrelevant to Luminor's business model. As a financial services provider, Luminor does not engage in activities involving animals, such as agriculture, research, or product development. Our operations are limited to office and digital environments, with no direct or indirect impact on animal well-being. Considering these conditions and strong regional legislation protecting animal rights, this topic is excluded from the full materiality analysis. Overall, ESRS G1 topics do not meet the criteria for materiality under the impact, risk, and opportunity perspective.

ESRS BUSINESS MODEL RESILIENCE

Business model resilience was assessed as part of the current DMA and concluded to be not material for Luminor. This conclusion is based on the application of ESRS materiality criteria to the Luminor's actual and potential impacts, risks and opportunities.

The analysis considered risks such as inadequate management of capital adequacy and liquidity, which could undermine financial stability; failure to ensure business continuity, potentially leading to layoffs or partner losses; market abuse risks, including insider list management and personal transactions; and compliance breaches related to tax evasion or suspicious supplier activities. Opportunities linked to positive supervisory outcomes and operational resilience were also reviewed. While these aspects are critical for sound governance, they are managed through established internal frameworks and controls embedded in day-to-day operations. Existing measures, including ICAAP and ILAAP processes, stress testing, liquidity management, and compliance monitoring, contribute to the mitigation of identified risks. Additionally, they are comprehensively addressed through EU prudential regulations. No evidence suggests systemic harm or financial effects exceeding ESRS materiality thresholds.

Considering the strong regulatory environment, robust internal controls, and absence of identified incidents, business model resilience does not meet the criteria for materiality under the impact, risk, and opportunity perspective.

ESRS CYBERSECURITY

Cybersecurity was assessed as part of the current DMA and concluded to be not material for Luminor. This conclusion is based on the application of ESRS materiality criteria to the Luminor's actual and potential impacts, risks and opportunities. The analysis considered risks such as data breaches, financial network disruptions, and inadequate cybersecurity arrangements that could lead to financial losses, erosion of customer trust, or service interruptions. Potential escalation of cyber-warfare was also reviewed. While these risks are internally significant for operational resilience, they do not meet ESRS materiality thresholds for external reporting because impacts are contained through robust governance and technical controls. Luminor's cybersecurity framework is aligned with EU regulations and industry best practices, supported by ongoing risk assessments, resilience planning, and structured incident management processes to ensure service continuity and data protection. Considering the strong regulatory environment, comprehensive internal controls, and absence of systemic incidents or financial effects exceeding materiality thresholds, cybersecurity does not meet the criteria for materiality under the impact, risk, and opportunity perspective.

3. Additional metrics

LUMINOR CARBON FOOTPRINT

	Retrospective				Milestones and target years		
	Base year 2021	2024	2025	Year-on- year change, %	2005	2030	Annual % Target / Base year
Scope 1 GHG Emissions							
Gross Scope 1 GHG emissions, tCO ₂ e	51	31	32	1	-	-	-
Percentage of Scope 1 GHG emissions from regulated emission trading schemes, %	0	0	0	0	-	-	-
Scope 2 GHG Emissions							
Gross location-based Scope 2 GHG emissions, tCO ₂ e	N/A (a)	2,519	2,750	9	-	-	-
Gross market-based Scope 2 GHG emissions, tCO ₂ e	2,155	1,012	927	-8	-	-	-
Significant Scope 3 GHG emissions							
Total Gross indirect (Scope 3) GHG emissions, tCO ₂ e	1,054	3,201,035	3,329,723	4	-	-	-
1 Purchased goods and services		5	13	162	-	-	-
2 Capital goods (a)	-	182	292	61	-	-	-
3 Fuel and energy-related Activities (not included in Scope1 or Scope 2)	-	-	-	-	-	-	-
4 Upstream transportation and distribution	-	-	-	-	-	-	-
5 Waste generated in operations	24	48	37	-23	-	-	-
6 Business traveling	87	700	697	0	-	-	-
7 Employee commuting	936	592	241	-59	-	-	-
8 Upstream leased assets	-	-	-	-	-	-	-
9 Downstream transportation	-	-	-	-	-	-	-
10 Processing of sold products	-	-	-	-	-	-	-
11 Use of sold products	-	-	-	-	-	-	-
12 End-of-life treatment of sold products	-	-	-	-	-	-	-
13 Downstream leased asset	-	-	-	-	-	-	-
14 Franchises	-	-	-	-	-	-	-
15 Investments (a)	-	3,199,507	3,328,442	4	-	-	-
Total GHG emissions							
Total GHG emissions (location-based) , tCO ₂ e	-	3,203,585	3,332,505	4	-	-	-
Total GHG emissions (market-based) , tCO ₂ e	-	3,202,078	3,330,682	4	-	-	-
GHG emissions intensity location-based, total GHG emissions per net revenue (a)	-	5,063	6,203	23	-	-	-
GHG emissions intensity market-based, total GHG emissions per net revenue(a)	-	5,060	6,200	23	-	-	-

a. To calculate GHG emission intensity per company revenue we have used the same Net revenue as provided in the financial statement. No deductions or adjustments are applied to the used net revenue amount. The revenue used for GHG intensity calculation can be found in the table below. In 2024, we reported a net revenue of 632.8 EUR million, and in 2025 537.2 EUR million. In both years, the entire amount was used to calculate GHG intensity, with no revenue excluded from the calculation. The Net revenue is provided in consolidated financial statement section 'Consolidated statement of profit or loss'.

FINANCED EMISSIONS BY ASSET CLASS AND DATA QUALITY SCORES

	2024					2025				
	PCAF quality score	Financed emissions, tCO ₂ e			On Balance sheet assets, €m	PCAF quality score	Financed emissions, tCO ₂ e			On Balance sheet assets, €m
		Scope 1 & 2	Scope 3	Total			Scope 1 & 2	Scope 3	Total	
Mortgages	3.3	241,562	n/a	241,562	5,427.6	3.1	151,578	n/a	151,578	5,914.8
Corporate lending	4.1	670,712	1,913,971	2,584,683	3,702.0	4.1	649,159	1,671,358	2,320,517	4,001.2
Motor vehicle loans	4.0	74,483	n/a	74,483	1,322.8	4.0	57,368	n/a	57,368	1,459.1
Listed equity and corporate bonds	2.1, 5	10,606	102,595	113,201	303.8	1, 5	73,458	542,468	615,926	404.0
Sovereign debt (a)	1.0	n/a	n/a	185,578	1,353.9	1.0	n/a	n/a	183,053	1,649.1
Total	n/a	997,362	2,016,567	3,199,507	12,110.0	n/a	931,563	2,213,826	3,328,442	13,428.2

a. PCAF does not provide emission factors individually for Scope 1, 2, and 3 assets. On balance assets equals the gross amount, i.e., before any impairments. The data methodologies and limitations are provided in the 'Other' under the section 'Data Methodologies and limitations', subsection 'Scope 3 - financed emissions'.

CLIMATE AND ENVIRONMENTAL RISKS ON BUSINESS ENVIRONMENT

Private lending principal risks

Private lending principal risks			Chronic physical risks															Acute physical risks												Transition risks								
			Changing temperature	Heat stress	Temperature variability	Permafrost thawing	Changing wind patterns	Changing precipitation	Precipitation or hydrological variability	Ocean acidification	Saline intrusion	Sea level rise	Water stress	Coastal erosion	Soil degradation	Soil erosion	Soil fluctuation	Heat wave	Cold wave/frost	Wildfire	Cyclone, hurricane	Storm	Tornado	Drought	Heavy precipitation	Flood	Glacial lake outburst	Avalanche	Landslide	Subsidence	Policy risk	Litigation risk	Technology risk	Market risk	Reputation risk			
Short term																																						
Mortgages and consumer lending	EE	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	-	-	-	✓	✓	-	-	-	-	-	✓	-	-	-	-			
	LV	✓	-	-	-	✓	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	✓	-	✓	✓	✓	-	-	-	-	-	✓	-	-	-	-			
	LT	✓	-	-	-	✓	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	✓	-	✓	✓	✓	-	-	-	-	-	✓	-	-	-	-			
Leasing (private and corporate)	EE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	-	-	-	-	-	✓	-	-	-	-			
	LV	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	✓	✓	-	-	-	-	-	✓	-	-	-	-			
	LT	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	✓	✓	-	-	-	-	-	✓	-	-	-	-			
Medium term																																						
Mortgages and consumer lending	EE	✓	-	-	-	✓	✓	-	-	-	-	✓	-	-	-	-	✓	-	✓	-	✓	-	✓	✓	✓	-	-	-	-	✓	-	-	✓	-				
	LV	✓	-	-	-	✓	✓	-	-	-	-	✓	-	-	-	-	✓	-	✓	-	✓	-	✓	✓	✓	-	-	-	-	✓	-	-	✓	-				
	LT	✓	-	-	-	✓	✓	-	-	-	-	-	-	-	-	-	✓	-	✓	-	✓	-	✓	✓	✓	-	-	-	-	✓	-	-	✓	-				
Leasing (private and corporate)	EE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	-	-	✓	-				
	LV	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	-	-	✓	-				
	LT	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	-	-	✓	-				
Long term																																						
Mortgages and consumer lending	EE	✓	✓	-	-	✓	✓	-	-	-	✓	✓	✓	-	-	-	✓	-	✓	-	✓	-	✓	✓	✓	-	-	-	✓	✓	-	-	✓	-				
	LV	✓	✓	-	-	✓	✓	-	-	-	✓	✓	✓	-	-	-	✓	-	✓	-	✓	-	✓	✓	✓	-	-	-	✓	✓	-	-	✓	-				
	LT	✓	✓	-	-	✓	✓	-	-	-	✓	✓	✓	-	-	-	✓	-	✓	-	✓	-	✓	✓	✓	-	-	-	✓	✓	-	-	✓	-				
Leasing (private and corporate)	EE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	✓	✓	-	-	-	-	✓	✓	-	-	✓	-				
	LV	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	✓	✓	-	-	-	✓	✓	-	-	✓	-				
	LT	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	✓	✓	-	-	-	✓	✓	-	-	✓	-				

Short term principal risks

SMEs	Chronic physical risks																	Acute physical risks											Transition risks				
	Changing temperature	Heat stress	Temperature variability	Permafrost thawing	Changing wind patterns	Changing precipitation	Precipitation or hydrological variability	Ocean acidification	Saline intrusion	Sea level rise	Water stress	Coastal erosion	Soil degradation	Soil erosion	Soilfluction	Heat wave	Cold wave/frost	Wildfire	Cyclone, hurricane	Storm	Tornado	Drought	Heavy precipitation	Flood	Glacial lake outburst	Avalanche	Landslide	Subsidence	Policy risk	Litigation risk	Technology risk	Market risk	Reputation risk
Businesses																																	
Agriculture, forestry and fishing	EE	✓	✓	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	-	-	-	✓	✓	-	-	-	-	✓	✓	-	-	✓
	LV	✓	-	-	-	-	-	-	-	-	✓	-	-	-	-	✓	-	✓	-	✓	-	✓	✓	✓	-	-	-	-	✓	✓	-	-	✓
	LT	✓	✓	-	-	-	✓	-	-	-	✓	-	-	-	-	✓	-	✓	-	✓	-	✓	✓	✓	-	-	-	-	✓	✓	-	-	✓
Mining and quarrying	EE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	-	-	-	✓	-	-	-	✓
	LV	-	-	-	-	-	-	-	-	-	✓	-	-	-	-	-	-	-	-	✓	-	✓	✓	✓	-	-	-	-	✓	-	-	-	✓
	LT	-	-	-	-	-	-	-	-	-	✓	-	-	-	-	-	-	-	-	✓	-	✓	✓	✓	-	-	-	-	✓	-	-	-	✓
Manufacturing	EE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	-	-	-	✓	✓	✓	-	✓
	LV	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	-	✓
	LT	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	-	✓
Electricity, gas, steam and aircon	EE	✓	✓	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	-	-	-	✓	✓	-	-	-	-	✓	✓	✓	-	✓
	LV	✓	-	-	-	-	-	-	-	-	✓	-	-	-	-	✓	-	-	-	✓	-	✓	✓	✓	-	-	-	-	✓	✓	✓	-	✓
	LT	✓	✓	-	-	-	✓	-	-	-	✓	-	-	-	-	✓	-	-	-	✓	-	✓	✓	✓	-	-	-	-	✓	✓	✓	-	✓
Water supply	EE	✓	✓	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	-	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LV	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LT	✓	✓	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
Construction	EE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	-	-	-	✓	✓	-	-	✓
	LV	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	-	-	✓
	LT	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	-	-	✓
Wholesale and retail trade	EE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	✓	✓	
	LV	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	✓	✓	
	LT	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	✓	✓	
Transportation and Storage	EE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LV	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LT	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
Accommodation and food service	EE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	-	-	-	✓	✓	-	-	-	-	✓	-	-	-	-
	LV	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	-	-	-	-
	LT	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	-	-	-	-
Information and communication	EE	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	-	-	-	✓	✓	-	-	-	-	✓	✓	✓	-	✓
	LV	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	✓	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	-	✓
	LT	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	✓	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	-	✓
Financial and insurance activities	EE	✓	✓	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	-	-	-	✓	✓	-	-	-	-	✓	✓	✓	-	✓
	LV	✓	✓	-	-	-	-	-	-	-	✓	-	-	-	-	✓	-	✓	-	✓	-	✓	✓	✓	-	-	-	-	✓	✓	✓	-	✓
	LT	✓	✓	-	-	-	✓	-	-	-	✓	-	-	-	-	✓	-	✓	-	✓	-	✓	✓	✓	-	-	-	-	✓	✓	✓	-	✓
Real estate activities	EE	✓	✓	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	-	-	-	✓	✓	-	-	-	-	✓	-	✓	✓	-
	LV	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	✓	-	✓	-	-	✓	✓	-	-	-	-	✓	-	✓	✓	-
	LT	✓	✓	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	✓	-	✓	-	-	✓	✓	-	-	-	-	✓	-	✓	✓	-
Other activities	EE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	LV	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	LT	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Large Corporate

Chronic physical risks										Acute physical risks										Transition risks												
Changing temperature	Heat stress	Temperature variability	Permafrost thawing	Changing wind patterns	Changing precipitation	Precipitation or hydrological variability	Ocean acidification	Saline intrusion	Sea level rise	Water stress	Coastal erosion	Soil degradation	Soil erosion	Soilification	Heat wave	Cold wave/frost	Wildfire	Cyclone, hurricane	Storm	Tornado	Drought	Heavy precipitation	Flood	Glacial lake outburst	Avalanche	Landslide	Subsidence	Policy risk	Litigation risk	Technology risk	Market risk	Reputation risk

Businesses																																	
Agriculture, forestry and fishing	EE	✓	✓	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	-	-	-	✓	✓	-	-	-	-	✓	✓	-	-	✓
	LV	✓	-	-	-	-	-	-	-	-	✓	-	-	-	-	✓	-	✓	-	✓	-	✓	✓	✓	-	-	-	-	✓	✓	-	-	✓
	LT	✓	✓	-	-	-	✓	-	-	-	✓	-	-	-	-	✓	-	✓	-	✓	-	✓	✓	✓	-	-	-	-	✓	✓	-	-	✓
Mining and quarrying	EE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	-	-	-	✓	-	-	-	✓
	LV	-	-	-	-	-	-	-	-	-	✓	-	-	-	-	-	-	-	-	✓	-	✓	✓	✓	-	-	-	-	✓	-	-	-	✓
	LT	-	-	-	-	-	-	-	-	-	✓	-	-	-	-	-	-	-	-	✓	-	✓	✓	✓	-	-	-	-	✓	-	-	-	✓
Manufacturing	EE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	-	-	-	✓	✓	✓	-	✓
	LV	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	-	-	-	✓	✓	✓	-	✓
	LT	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	-	-	-	✓	✓	✓	-	✓
Electricity, gas, steam and aircon	EE	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	✓	✓	-	-	-	-	✓	✓	✓	-	✓
	LV	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	✓	✓	-	-	-	-	✓	✓	✓	-	✓
	LT	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	✓	✓	-	-	-	-	✓	✓	✓	-	✓
Water supply	EE	✓	✓	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	-	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LV	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LT	✓	✓	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
Construction	EE	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	-	✓
	LV	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	-	✓
	LT	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	-	✓
Wholesale and retail trade	EE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	✓	✓
	LV	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	✓	✓
	LT	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	✓	✓
Transportation and Storage	EE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LV	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LT	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
Accommodation and food service	EE	✓	✓	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	-	-	-	✓	✓	-	-	-	-	✓	-	-	-	-
	LV	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	✓	-	✓	-	-	✓	✓	-	-	-	-	✓	-	-	-	-
	LT	✓	✓	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	✓	-	✓	-	-	✓	✓	-	-	-	-	✓	-	-	-	-
Information and communication	EE	✓	✓	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	-	-	-	✓	✓	-	-	-	-	✓	✓	✓	-	✓
	LV	✓	✓	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	✓	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	-	✓
	LT	✓	✓	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	✓	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	-	✓
Financial and insurance activities	EE	✓	✓	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	-	-	-	✓	✓	-	-	-	-	✓	✓	✓	-	✓
	LV	✓	✓	-	-	-	-	-	-	-	✓	-	-	-	-	✓	-	✓	-	✓	-	✓	✓	✓	-	-	-	-	✓	✓	✓	-	✓
	LT	✓	✓	-	-	-	✓	-	-	-	✓	-	-	-	-	✓	-	✓	-	✓	-	✓	✓	✓	-	-	-	-	✓	✓	✓	-	✓
Real estate activities	EE	✓	✓	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	-	-	-	✓	✓	-	-	-	-	✓	-	✓	✓	-
	LV	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	✓	-	✓	-	-	✓	✓	-	-	-	-	✓	-	✓	✓	-
	LT	✓	✓	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	✓	-	✓	-	-	✓	✓	-	-	-	-	✓	-	✓	✓	-
Other activities	EE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	LV	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	LT	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Medium term principal risks

SMEs	Chronic physical risks																Acute physical risks												Transition risks				
	Changing temperature	Heat stress	Temperature variability	Permafrost thawing	Changing wind patterns	Changing precipitation	Precipitation or hydrological variability	Ocean acidification	Saline intrusion	Sea level rise	Water stress	Coastal erosion	Soil degradation	Soil erosion	Soilfluction	Heat wave	Cold wave/frost	Wildfire	Cyclone, hurricane	Storm	Tornado	Drought	Heavy precipitation	Flood	Glacial lake outburst	Avananche	Landslide	Subsidence	Policy risk	Litigation risk	Technology risk	Market risk	Reputation risk
Businesses																																	
Agriculture, forestry and fishing	EE	✓	✓	-	-	-	✓	-	-	-	✓	-	-	-	-	✓	-	✓	-	✓	-	✓	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LV	✓	-	-	-	-	✓	✓	-	-	✓	-	-	-	-	✓	-	✓	-	✓	-	✓	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LT	✓	✓	-	-	-	✓	✓	-	-	✓	-	-	-	-	✓	-	✓	-	✓	-	✓	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
Mining and quarrying	EE	-	-	-	-	-	✓	-	-	-	✓	-	-	-	-	-	-	-	-	✓	-	✓	✓	✓	-	-	-	-	✓	-	✓	-	✓
	LV	-	-	-	-	-	✓	-	-	-	✓	-	-	-	-	-	-	-	-	✓	-	✓	✓	✓	-	-	-	-	✓	-	✓	-	✓
	LT	-	-	-	-	-	✓	-	-	-	✓	-	-	-	-	-	-	-	-	✓	-	✓	✓	✓	-	-	-	-	✓	-	✓	-	✓
Manufacturing	EE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LV	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LT	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
Electricity, gas, steam and aircon	EE	✓	✓	-	-	-	-	-	-	-	✓	✓	-	-	-	✓	-	-	-	✓	-	✓	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LV	✓	-	-	-	-	-	✓	-	-	✓	✓	-	-	-	✓	-	-	-	✓	-	✓	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LT	✓	✓	-	-	-	-	✓	-	-	✓	-	-	-	-	✓	-	-	-	✓	-	✓	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
Water supply	EE	✓	✓	-	-	-	✓	-	-	-	-	-	-	-	-	✓	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LV	✓	-	-	-	-	✓	-	-	-	-	-	-	-	-	✓	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LT	✓	✓	-	-	-	✓	-	-	-	-	-	-	-	-	✓	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
Construction	EE	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LV	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LT	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
Wholesale and retail trade	EE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	✓	✓	
	LV	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	✓	✓	
	LT	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	✓	✓	
Transportation and Storage	EE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LV	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LT	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
Accommodation and food service	EE	✓	✓	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	-	-	✓	-
	LV	✓	✓	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	-	-	✓	-
	LT	✓	✓	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	-	-	✓	-
Information and communication	EE	✓	-	-	-	-	✓	-	-	-	-	-	-	-	-	✓	-	✓	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LV	✓	-	-	-	-	✓	-	-	-	-	-	-	-	-	✓	-	✓	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LT	✓	-	-	-	-	✓	-	-	-	-	-	-	-	-	✓	-	✓	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
Financial and insurance activities	EE	✓	✓	-	-	-	✓	-	-	-	✓	✓	-	-	-	✓	-	✓	-	✓	-	✓	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LV	✓	✓	-	-	-	✓	✓	-	-	✓	✓	-	-	-	✓	-	✓	-	✓	-	✓	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LT	✓	✓	-	-	-	✓	✓	-	-	✓	-	-	-	-	✓	-	✓	-	✓	-	✓	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
Real estate activities	EE	✓	✓	-	-	-	-	-	-	-	-	✓	-	-	-	✓	-	✓	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LV	✓	-	-	-	-	-	-	-	-	-	✓	-	-	-	✓	-	✓	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LT	✓	✓	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	✓	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
Other activities	EE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
	LV	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
	LT	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

Large Corporates

Chronic physical risks										Acute physical risks										Transition risks												
Changing temperature	Heat stress	Temperature variability	Permafrost thawing	Changing wind patterns	Changing precipitation	Precipitation or hydrological variability	Ocean acidification	Saline intrusion	Sea level rise	Water stress	Coastal erosion	Soil degradation	Soil erosion	Soilfluction	Heat wave	Cold wave/frost	Wildfire	Cyclone, hurricane	Storm	Tornado	Drought	Heavy precipitation	Flood	Glacial lake outburst	Avalanche	Landslide	Subsidence	Policy risk	Litigation risk	Technology risk	Market risk	Reputation risk

Businesses																																	
Agriculture, forestry and fishing	EE	✓	✓	-	-	-	✓	-	-	-	-	✓	-	-	-	✓	-	✓	-	✓	-	✓	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LV	✓	-	-	-	-	✓	✓	-	-	-	✓	-	-	-	✓	-	✓	-	✓	-	✓	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LT	✓	✓	-	-	-	✓	✓	-	-	-	✓	-	-	-	✓	-	✓	-	✓	-	✓	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
Mining and quarrying	EE	-	-	-	-	-	✓	-	-	-	-	✓	-	-	-	-	-	-	-	✓	-	✓	✓	✓	-	-	-	-	✓	-	✓	-	✓
	LV	-	-	-	-	-	✓	-	-	-	-	✓	-	-	-	-	-	-	-	✓	-	✓	✓	✓	-	-	-	-	✓	-	✓	-	✓
	LT	-	-	-	-	-	✓	-	-	-	-	✓	-	-	-	-	-	-	-	✓	-	✓	✓	✓	-	-	-	-	✓	-	✓	-	✓
Manufacturing	EE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓	
	LV	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓	
	LT	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓	
Electricity, gas, steam and aircon	EE	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LV	✓	-	-	-	-	-	✓	-	-	-	✓	-	-	-	-	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LT	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
Water supply	EE	✓	✓	-	-	-	✓	-	-	-	-	-	-	-	-	✓	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LV	✓	-	-	-	-	✓	-	-	-	-	-	-	-	-	✓	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LT	✓	✓	-	-	-	✓	-	-	-	-	-	-	-	-	✓	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
Construction	EE	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	✓	✓	✓
	LV	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	✓	✓	✓
	LT	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	✓	✓	✓
Wholesale and retail trade	EE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	✓	✓
	LV	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	✓	✓
	LT	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	✓	✓
Transportation and Storage	EE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LV	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LT	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
Accommodation and food service	EE	✓	✓	-	-	-	-	-	-	-	-	✓	-	-	-	✓	-	✓	-	✓	-	-	✓	✓	-	-	-	-	✓	-	-	✓	-
	LV	✓	-	-	-	-	-	-	-	-	-	✓	-	-	-	✓	-	✓	-	✓	-	-	✓	✓	-	-	-	-	✓	-	-	✓	-
	LT	✓	✓	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	✓	-	✓	-	-	✓	✓	-	-	-	-	✓	-	-	✓	-
Information and communication	EE	✓	✓	-	-	-	✓	-	-	-	-	-	-	-	-	✓	-	✓	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LV	✓	✓	-	-	-	✓	-	-	-	-	-	-	-	-	✓	-	✓	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LT	✓	✓	-	-	-	✓	-	-	-	-	-	-	-	-	✓	-	✓	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
Financial and insurance activities	EE	✓	✓	-	-	-	✓	-	-	-	✓	✓	-	-	-	✓	-	✓	-	✓	-	✓	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LV	✓	✓	-	-	-	✓	✓	-	-	✓	✓	-	-	-	✓	-	✓	-	✓	-	✓	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LT	✓	✓	-	-	-	✓	✓	-	-	✓	-	-	-	-	✓	-	✓	-	✓	-	✓	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
Real estate activities	EE	✓	✓	-	-	-	-	-	-	-	-	✓	-	-	-	✓	-	✓	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LV	✓	-	-	-	-	-	-	-	-	-	✓	-	-	-	✓	-	✓	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LT	✓	✓	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	✓	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
Other activities	EE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
	LV	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
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Long term principal risks

SMEs	Chronic physical risks																Acute physical risks												Transition risks				
	Changing temperature	Heat stress	Temperature variability	Permafrost thawing	Changing wind patterns	Precipitation or hydrological variability	Ocean acidification	Saline intrusion	Sea level rise	Water stress	Coastal erosion	Soil degradation	Soil erosion	Soilfluction	Heat wave	Cold wave/frost	Wildfire	Cyclone, hurricane	Storm	Tornado	Drought	Heavy precipitation	Flood	Glacial lake outburst	Avalanche	Landslide	Subsidence	Policy risk	Litigation risk	Technology risk	Market risk	Reputation risk	
Businesses																																	
Agriculture, forestry and fishing	EE	✓	✓	-	-	-	✓	✓	-	-	-	✓	-	-	✓	-	✓	-	-	✓	✓	✓	✓	-	-	-	-	✓	✓	-	✓	✓	
	LV	✓	✓	-	-	-	✓	✓	-	-	-	✓	-	-	✓	-	✓	-	-	✓	✓	✓	✓	-	-	-	-	✓	✓	-	✓	✓	
	LT	✓	✓	-	-	-	✓	✓	-	-	-	✓	-	-	-	✓	-	✓	-	✓	✓	✓	✓	-	-	-	-	✓	✓	-	✓	✓	
Mining and quarrying	EE	-	-	-	-	-	✓	-	-	-	✓	-	-	-	-	-	-	-	-	✓	✓	✓	✓	-	-	-	-	✓	✓	✓	✓	✓	
	LV	-	-	-	-	-	✓	-	-	-	✓	-	-	-	-	-	-	-	-	✓	✓	✓	✓	-	-	-	-	✓	✓	✓	✓	✓	
	LT	-	-	-	-	-	✓	-	-	-	✓	-	-	-	-	-	-	-	-	✓	✓	✓	✓	-	-	-	-	✓	✓	✓	✓	✓	
Manufacturing	EE	✓	✓	-	-	-	-	-	-	-	✓	✓	-	-	✓	-	-	-	-	✓	✓	✓	✓	-	-	-	-	✓	✓	✓	✓	✓	
	LV	✓	✓	-	-	-	-	-	-	-	✓	✓	-	-	✓	-	-	-	-	✓	✓	✓	✓	-	-	-	-	✓	✓	✓	✓	✓	
	LT	✓	✓	-	-	-	-	-	-	-	✓	✓	-	-	✓	-	-	-	-	✓	✓	✓	✓	-	-	-	-	✓	✓	✓	✓	✓	
Electricity, gas, steam and aircon	EE	✓	✓	-	-	-	✓	-	-	-	✓	✓	-	-	✓	-	-	-	-	✓	✓	✓	✓	-	-	-	-	✓	✓	✓	✓	✓	
	LV	✓	✓	-	-	-	✓	-	-	-	✓	✓	-	-	✓	-	-	-	-	✓	✓	✓	✓	-	-	-	-	✓	✓	✓	✓	✓	
	LT	✓	✓	-	-	-	✓	-	-	-	✓	✓	-	-	✓	-	-	-	-	✓	✓	✓	✓	-	-	-	-	✓	✓	✓	✓	✓	
Water supply	EE	✓	✓	-	-	-	✓	-	-	-	-	-	-	-	✓	-	-	-	-	✓	-	✓	✓	-	-	-	-	✓	✓	-	✓	✓	
	LV	✓	✓	-	-	-	✓	-	-	-	-	-	-	-	✓	-	-	-	-	✓	-	✓	✓	-	-	-	-	✓	✓	-	✓	✓	
	LT	✓	✓	-	-	-	✓	-	-	-	-	-	-	-	✓	-	-	-	-	✓	-	✓	✓	-	-	-	-	✓	✓	-	✓	✓	
Construction	EE	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LV	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LT	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
Wholesale and retail trade	EE	✓	✓	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	-	✓	✓	-	-	-	-	-	-	✓	✓	-	✓	✓	
	LV	✓	✓	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	-	✓	✓	-	-	-	-	-	-	✓	✓	-	✓	✓	
	LT	✓	✓	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	-	✓	✓	-	-	-	-	-	-	✓	✓	-	✓	✓	
Transportation and Storage	EE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	✓	✓	-	-	-	✓	✓	✓	✓	✓	
	LV	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	✓	✓	-	-	-	✓	✓	✓	✓	✓	
	LT	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	✓	✓	-	-	-	✓	✓	✓	✓	✓	
Accommodation and food service	EE	✓	✓	-	-	-	-	-	-	-	✓	-	-	-	✓	-	✓	-	-	✓	✓	-	✓	✓	-	-	-	✓	-	-	✓	-	
	LV	✓	✓	-	-	-	-	-	-	-	✓	-	-	-	✓	-	✓	-	-	✓	✓	-	✓	✓	-	-	-	✓	-	-	✓	-	
	LT	✓	✓	-	-	-	-	-	-	-	✓	-	-	-	✓	-	✓	-	-	✓	✓	-	✓	✓	-	-	-	✓	-	-	✓	-	
Information and communication	EE	✓	-	-	-	-	✓	-	-	-	-	-	-	-	✓	-	✓	-	-	✓	✓	-	✓	✓	-	-	-	✓	✓	✓	✓	✓	
	LV	✓	-	-	-	-	✓	-	-	-	-	-	-	-	✓	-	✓	-	-	✓	✓	-	✓	✓	-	-	-	✓	✓	✓	✓	✓	
	LT	✓	-	-	-	-	✓	-	-	-	-	-	-	-	✓	-	✓	-	-	✓	✓	-	✓	✓	-	-	-	✓	✓	✓	✓	✓	
Financial and insurance activities	EE	✓	✓	-	-	-	✓	✓	-	-	✓	✓	✓	-	✓	-	✓	-	-	✓	✓	✓	✓	-	-	-	✓	✓	✓	-	✓	✓	
	LV	✓	✓	-	-	-	✓	✓	-	-	✓	✓	✓	-	✓	-	✓	-	-	✓	✓	✓	✓	-	-	-	✓	✓	✓	-	✓	✓	
	LT	✓	✓	-	-	-	✓	✓	-	-	✓	✓	✓	-	✓	-	✓	-	-	✓	✓	✓	✓	-	-	-	✓	✓	✓	-	✓	✓	
Real estate activities	EE	✓	✓	-	-	-	-	-	-	-	✓	-	-	-	✓	-	✓	-	-	✓	✓	-	✓	✓	-	-	-	✓	✓	✓	✓	✓	
	LV	✓	✓	-	-	-	-	-	-	-	✓	-	-	-	✓	-	✓	-	-	✓	✓	-	✓	✓	-	-	-	✓	✓	✓	✓	✓	
	LT	✓	✓	-	-	-	-	-	-	-	✓	-	-	-	✓	-	✓	-	-	✓	✓	-	✓	✓	-	-	-	✓	✓	✓	✓	✓	
Other activities	EE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
	LV	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
	LT	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

Large Corporates

Chronic physical risks										Acute physical risks										Transition risks												
Reputation risk	Market risk	Technology risk	Litigation risk	Policy risk	Subsidence	Landslide	Avalanche	Glacial lake outburst	Flood	Heavy precipitation	Drought	Tornado	Storm	Cyclone, hurricane	Wildfire	Cold wave/frost	Heat wave	Soilification	Soil erosion	Soil degradation	Coastal erosion	Water stress	Sea level rise	Saline intrusion	Ocean acidification	Precipitation or hydrological variability	Changing precipitation	Changing wind patterns	Permafrost thawing	Temperature variability	Heat stress	Changing temperature

Businesses																																	
Agriculture, forestry and fishing	EE	✓	✓	-	-	-	✓	✓	-	-	-	✓	-	✓	-	✓	-	✓	✓	✓	✓	✓	✓	✓	-	-	-	-	✓	✓	-	✓	✓
	LV	✓	✓	-	-	-	✓	✓	-	-	-	✓	-	✓	-	✓	-	✓	✓	✓	✓	✓	✓	✓	-	-	-	-	✓	✓	-	✓	✓
	LT	✓	✓	-	-	-	✓	✓	-	-	-	✓	-	✓	-	✓	-	✓	✓	✓	✓	✓	✓	✓	-	-	-	-	✓	✓	-	✓	✓
Mining and quarrying	EE	-	-	-	-	-	✓	-	-	-	-	✓	-	-	-	-	-	-	-	✓	✓	✓	✓	✓	-	-	-	✓	✓	✓	✓	✓	✓
	LV	-	-	-	-	-	✓	-	-	-	-	✓	-	-	-	-	-	-	-	✓	✓	✓	✓	✓	-	-	-	✓	✓	✓	✓	✓	✓
	LT	-	-	-	-	-	✓	-	-	-	-	✓	-	-	-	-	-	-	-	✓	✓	✓	✓	✓	-	-	-	✓	✓	✓	✓	✓	✓
Manufacturing	EE	✓	✓	-	-	-	-	-	-	-	-	✓	-	✓	-	✓	-	-	-	✓	✓	✓	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LV	✓	✓	-	-	-	-	-	-	-	-	✓	-	✓	-	✓	-	-	-	✓	✓	✓	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LT	✓	✓	-	-	-	-	-	-	-	-	✓	-	✓	-	✓	-	-	-	✓	✓	✓	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
Electricity, gas, steam and aircon	EE	✓	✓	-	-	-	-	✓	-	-	-	✓	✓	-	-	✓	-	-	-	✓	✓	✓	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LV	✓	✓	-	-	-	-	✓	-	-	-	✓	✓	-	-	✓	-	-	-	✓	✓	✓	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LT	✓	✓	-	-	-	-	✓	-	-	-	✓	✓	-	-	✓	-	-	-	✓	✓	✓	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
Water supply	EE	✓	✓	-	-	-	✓	-	-	-	-	-	-	-	-	✓	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	-	✓	✓
	LV	✓	✓	-	-	-	✓	-	-	-	-	-	-	-	-	✓	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	-	✓	✓
	LT	✓	✓	-	-	-	✓	-	-	-	-	-	-	-	-	✓	-	-	-	✓	-	-	✓	✓	-	-	-	-	✓	✓	-	✓	✓
Construction	EE	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LV	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LT	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
Wholesale and retail trade	EE	✓	✓	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	✓	✓	-	-	-	-	-	-	-	✓	✓	-	✓	✓
	LV	✓	✓	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	✓	✓	-	-	-	-	-	-	-	✓	✓	-	✓	✓
	LT	✓	✓	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	✓	✓	-	-	-	-	-	-	-	✓	✓	-	✓	✓
Transportation and Storage	EE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LV	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LT	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
Accommodation and food service	EE	✓	✓	-	-	-	-	-	-	-	-	-	✓	-	-	✓	-	✓	-	✓	✓	-	✓	✓	-	-	-	-	✓	-	-	✓	-
	LV	✓	✓	-	-	-	-	-	-	-	-	-	✓	-	-	✓	-	✓	-	✓	✓	-	✓	✓	-	-	-	-	✓	-	-	✓	-
	LT	✓	✓	-	-	-	-	-	-	-	-	-	✓	-	-	✓	-	✓	-	✓	✓	-	✓	✓	-	-	-	-	✓	-	-	✓	-
Information and communication	EE	✓	✓	-	-	-	✓	-	-	-	-	-	-	-	-	✓	-	✓	-	✓	✓	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LV	✓	✓	-	-	-	✓	-	-	-	-	-	-	-	-	✓	-	✓	-	✓	✓	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LT	✓	✓	-	-	-	✓	-	-	-	-	-	-	-	-	✓	-	✓	-	✓	✓	-	✓	✓	-	-	-	-	✓	✓	✓	✓	✓
Financial and insurance activities	EE	✓	✓	-	-	-	✓	✓	-	-	-	✓	✓	✓	-	✓	-	✓	-	✓	✓	✓	✓	✓	-	-	-	✓	✓	✓	-	✓	✓
	LV	✓	✓	-	-	-	✓	✓	-	-	-	✓	✓	✓	-	✓	-	✓	-	✓	✓	✓	✓	✓	-	-	-	✓	✓	✓	-	✓	✓
	LT	✓	✓	-	-	-	✓	✓	-	-	-	✓	✓	✓	-	✓	-	✓	-	✓	✓	✓	✓	✓	-	-	-	✓	✓	✓	-	✓	✓
Real estate activities	EE	✓	✓	-	-	-	-	-	-	-	-	-	✓	-	-	✓	-	✓	-	✓	✓		✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LV	✓	✓	-	-	-	-	-	-	-	-	-	✓	-	-	✓	-	✓	-	✓	✓		✓	✓	-	-	-	-	✓	✓	✓	✓	✓
	LT	✓	✓	-	-	-	-	-	-	-	-	-	✓	-	-	✓	-	✓	-	✓	✓		✓	✓	-	-	-	-	✓	✓	✓	✓	✓
Other activities	EE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
	LV	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
	LT	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

4. Our Policies, Procedures, and Standards

Internal regulation	Description of key contents
Adverse Media Screening Instruction	This instruction defines the process of screening for adverse media information in public sources and describes the roles and responsibilities in investigating the risks identified during the process. The purpose of adverse media screening is to prevent Luminor being used for financial crime and engaging with legal entities or private individuals who are involved in or related to or found guilty of financial crime or ESG related offences. Daily exposure checks for high risk clients against adverse media let us identify existing or perspective customers that might be victims or perpetrators or accomplices of financial crime.
Business Model Risk Policy	This policy sets out the core components of business model risk management, including Group Strategy, Financial Plan, products & pricing framework, performance criteria, and performance management, as well as related principles and limitations. The regulation outlines how potential key vulnerabilities to our business model arising from identified ESG risk drivers should be considered during the Group Strategy planning process, and product & pricing framework development.
Code of Conduct (the Code)	This is an annex to our Code of Conduct which outlines our values and principles for responsible business conduct that we expect third parties to follow, including concerns for the impact on society and the environment of the business activities. We supplement this annex to our agreements with all suppliers and vendors from outside the EU/EEA unless they confirm that their own approved internal regulations are aligned with our conduct principles.
Code of Responsible Business Conduct for Third Parties	This is an annex to our Code of Conduct which outlines our values and principles for responsible business conduct that we expect third parties to follow, including concerns for the impact on society and the environment of the business activities. We supplement this annex to our agreements with all suppliers and vendors from outside the EU/EEA unless they confirm that their own approved internal regulations are aligned with our conduct principles.
Compliance Risk Policy	Compliance Risk Policy outlines essential components for robust Compliance Risk management. It defines principles for integrating external requirements into internal control systems and governance arrangements.
Conflict of Interest Management Standard & Conflict of Interest Management Procedure	The internal regulations sets the requirements for identifying, preventing and managing the Conflicts of Interest in Luminor. Conflicts of Interest can be related to Employees, Management Bodies, structural units, third parties, business activities, including the provision of loans, the provision of Investment and / or Ancillary Services, the provision of Pension Fund management services, launch of a new product or service, approval of a new target market, a change to an existing product or service or the defined target market, or ad hoc review.
Customer Complaints, Feedback and Requests Handling Procedure (& also Standard)	The internal regulations together set forth the framework and overall principles for handling of customer complaints, feedback and requests, as well as mistakes found by our employees. They outline roles and responsibilities of structural units in complaints handling, reporting, analyzing data and following-up on improvements. When mitigating negative impacts, we follow the applicable EU and national regulations. These provisions also apply i to our external vendors acting under an agreement to sell our products, and to all the customer segments we serve, including third party service providers who use our open banking solutions.
Being Human – Luminor guide to a memorable customer experience	The standard outlines the essential guidelines and best practice for delivering exceptional customer service. It aims to enhance customer satisfaction and loyalty through consistency, efficiency and high-quality interactions across all customer touchpoints. It sets out detailed steps for handling customer inquiries, resolving issues, and maintaining a positive customer experience.
Data Protection Standard	This standard establishes the requirements for the protection and handling of personal data. It defines the organizational roles and responsibilities for addressing the specific compliance obligations arising from data protection laws and regulations, including but not limited to the EU General Data Protection Regulation (GDPR). Furthermore, these standard outlines the process for monitoring and controlling adherence to both this internal regulation and applicable external data protection requirements.
Data Quality Management Procedure	The regulation defines the main principles and responsibilities for data quality management, setting out guidelines for data collection, storage, architecture, and aggregation, and for monitoring of data quality for the completeness, validity, timeliness, accuracy, consistency and uniqueness of the data, as well as remediation steps for if data quality issues arise. It aims to establish a standardised and systematic approach to evaluating and improving the quality of data across the organisation. This approach is designed to follow the principles outlined in the Basel Committee on Banking Supervision Standard no. 239.
Data Specification for ESG Data Proxies	This internal regulation describes all of the data requirements needed for developing the ESG risk data model, including the data sources, and where to get the data needed. This internal regulation also provides the methodologies for estimating the data attributes if the data are not yet in our systems or if it is not possible to get the data needed in the right format from external data providers.
Discretionary Portfolio Management ESG Due Diligence Procedure	The procedure sets out how ESG risks and principal adverse impacts are integrated in the investment decision making processes, following the principles set in our Sustainability Policy and the Sustainable Investment Guidelines, when managing client investment portfolio on a discretionary basis. It outlines how the ESG due diligence assessment is performed before and during the investment decision making process, including the relevant methodology and the allocation of responsibility when the principal adverse impact prioritisation framework is applied. The regulation also defines roles and responsibilities for monitoring and reporting processes.
Double Materiality Assessment Procedure	The procedure defines the Double Materiality Assessment (DMA) processes for identification, assessment, management, and disclosure of sustainability-related impacts, risks, and opportunities (IROs), as well as risk treatment approaches through a dedicated DMA Outcome Memo. Material Sustainability Matters are identified and assessed from both impact and financial materiality perspectives, relying on stakeholder engagement. The DMA outcomes are reviewed and approved by the Management Board, overseen by Supervisory Council, and the outcome are integrated into Luminor's business strategy, risk management processes and sustainability reporting in accordance with the Sustainability Reporting Standard. The procedure aligns with the European Sustainability Reporting Standards (ESRS) and Sustainability Accounting Standards Board (SASB) Standards.
ESG Data Management Procedure	This procedure establishes the principles, roles, and responsibilities for managing ESG data within Luminor in line with our data management framework. It aims to ensure accurate and reliable ESG data management to support informed decision-making and compliance with internal and external reporting requirements. The procedure details the process of collaboration between business units and support functions, covering stages from initiation and analysis to implementation and finalization. Regular monitoring and documentation are in place to maintain data quality and integrity.

Internal regulation	Description of key contents
ESG Due Diligence Standard	This document establishes our principles, roles and responsibilities, and describes the steps to be followed when the ESG Due Diligence process is applied in our business activities, decision making and relationships with our employees, customers, vendors, and suppliers. The aim is to avoid or minimise any harm to society and the environment that might be caused by our business activities or those of our customers, vendors and suppliers. This standard has been developed in accordance with the OECD Due Diligence Guidance for Responsible Business Conduct and builds on the UN Guiding Principles on Business and Human Rights, the UN Sustainable Development Goals, the EBRD Environmental and Social Risk Categorisation List, the EU Taxonomy, and other relevant EU regulations. The standard is aligned with the Luminor Risk Policy and Strategy for the non-financial risk assessment grid and with the Sustainability Policy for the exclusion list from our direct investments and financing universe.
ESG Risk Assessment Procedure	This internal regulation defines ESG Risk assessment principles for legal entities which is a part of the overall creditworthiness assessment process. The procedure establishes a risk-based approach for ESG risk assessment process, focusing on customers whose inherent environmental, social and governance risks are high and the size of their credit exposure is material to the Luminor. An enhanced risk assessment is performed for the customers where elevated inherent ESG risks are identified, conclusions on the customer's risk mitigation capacity are drawn and the residual risk level is defined. Main conclusions and the residual ESG risk level are documented and considered in the credit decision making process.
Individual Performance Management Procedure	The procedure outlines the process for managing individual performance within the Luminor Group, setting out the roles and responsibilities of managers and employees. It describes how to set individual goals, provide regular feedback through one-to-one meetings and quarterly snaps, and conduct year-end reviews. The procedure aims to create clarity, build alignment, and develop the abilities needed for executing the strategy. It also addresses how to manage poor performance through informal counselling and formal improvement plans, and to ensure that employees are given opportunities to improve and are supported in their development.
Industry ESG Risk Management Procedure	This is a subordinated document to the ESG Risk Assessment Procedure that provides additional guidance for sectors with medium or high climate risk exposure. It details sector-specific climate risks and risk drivers, and outlines possible ways of mitigating risks, such as developing climate-friendly policies and procedures, setting targets and metrics, and main elements of transition planning. It also describes the general lending guidance as defined in ESG Risk Assessment Procedure and expectations for customers in these sectors towards mitigating and adapting to climate change, pursuing energy efficiency, shifting towards increased use of renewable energy, etc.
Lending Risk Parameters for Private Individuals Procedure	This internal regulation describes the main lending criteria and conditions that are applicable to private lending, including leasing. The document covers loan participants, main loan features, applicable risk ratios, and main characteristics of the real estate pledge.
Performance Management Procedure	The procedure provides a structured and systematic approach to managing the Luminor Group's performance in alignment with the Strategy and the Financial Plan of the organization. It outlines main rules and principles used for performance management and sets out roles and responsibilities applicable for the performance management process, which includes KPI setting for Senior Management, monitoring progress against strategic and financial targets, and conducting regular follow-ups to ensure effective strategy execution.
Procedure for Personal Transactions in Financial Instruments	This Procedure implements the Personal Transaction requirements applicable to the employees of investment firms as set forth in the MiFID II Regulation on Organisational Requirements, the related requirements stemming from the Market Abuse Regulation and requirements applicable to the Personal Transactions of Employees of Asset Management Companies. The Procedure supports implementation of the Compliance Risk Policy and Compliance Standards by providing detailed guidance on the specific steps to be taken and by defining the respective roles and responsibilities
Procedure of Handling of Inside Information and Insider List	This Procedure sets out the principles and measures that Luminor takes to ensure due handling and disclosure of Inside Information in order to prevent market abuse activities in conformity with the requirements of the Market Abuse Regulation and its underlying regulations. The Procedure supports implementation of the Compliance Risk Policy and the Compliance Standards with a detailed guidance on specific preventive actions to be taken and a definition of the respective roles and responsibilities of the Employees.
Product Management Procedure	This procedure governs the processes for managing Luminor's products, including developing new products, making changes to existing products, and decommissioning. It establishes the definitions of products and provides guidelines for product documentation and assessment processes. We aim to ensure that our customer interests, objectives, characteristics, and sustainability preferences are considered, potential consumer detriment is mitigated, and conflicts of interest are minimized. The procedure aligns product management with Luminor's business strategy, and our internal regulations for risk management and accounting.
Remuneration Policy	The policy is designed to produce transparent and balanced remuneration programmes that align individual performance with the long-term goals of the organisation. The aim is to attract, develop, and retain motivated and skilled employees without encouraging excessive risk-taking. The policy emphasises equal opportunities and non-discrimination within both fixed and variable remuneration, and it contains measures for preventing mis-selling in retail banking and ensuring fairness in investment services. The remuneration structure has fixed and variable components, with performance fees at the discretion of the Supervisory Council, and with priority given to financial stability and regulatory compliance.
Risk Appetite Statement (RAS)	The Statement is a strategic document and a deliverable that is governed by the Risk Policy and prepared in accordance with the Risk Appetite Framework – Policy. The RAS defines the overall risk appetite, risk strategy, risk appetite statements, and metrics for all material Level 1 risk types that we are exposed to, and also for the risk drivers, which may influence a broad range of risk types and sub-types in a material way.
Risk Policy	The Risk Policy defines the risk management framework, the key risk management principles, and the roles and responsibilities for risk management within Luminor.
Sourcing and Third Party Management Procedure	This procedure establishes a consistent approach for the sourcing and purchasing of all goods and services and for managing the risks and performance-related activities throughout the third party management lifecycle: from the point when the business identifies that it needs to use a third party or intragroup service provider, up to when the agreement is renewed or terminated, or expires. It provides a set of templates for supplier due diligence questionnaires, depending on supplier classification, which all contain an ESG related questionnaire, and outlines their application process. The Procedure is aligned with the relevant guidelines of EBA and ESMA, and the EU Digital Operational Resilience Act.
Speak-Up Procedure	This Procedure describes how submitted Speak-up Reports are received, assessed, recorded, and performed in a structured and respectful manner, safeguarding the rights of all parties involved and ensuring that any substantiated risks or issues are addressed appropriately. The speak-up process establishes reporting channels where a Reporter can submit their Speak-up Report. If a submitted Speak-up Report meets the requirements of whistleblowing, the Report is reviewed in accordance with the Whistleblowing Procedure.
Strategy Planning Procedure	This procedure outlines the strategic planning process, which includes formulating and planning the execution of the long-term group strategy. This procedure encompasses the preparation, review and approval of the strategy, and planning for its execution, detailing the roles and responsibilities, the scope and structure of it, the annual cycle, and the approval process.

Internal regulation	Description of key contents
Sustainability Policy	This policy establishes the guiding principles and key components of the sustainability framework to be implemented in relevant Luminor business activities, decision-making processes and relationships with our stakeholders to achieve our sustainability objectives. The policy outlines governance and responsibilities for the Supervisory Council and the Management Board and prescribes the integration of ESG aspects into strategy, risk management, transition planning, and reporting. Our policy follows the guidance from international standards including the UN Sustainable Development Goals, the UN Guiding Principles on Business and Human Rights, the UN Global Compact, the OECD Guidelines for Multinational Enterprises, the OECD Due Diligence Guidance for Responsible Business Conduct, the International Labour Organization (ILO) Conventions, the Paris Agreement, and the Kunming-Montreal Global Biodiversity Framework.
Sustainability Reporting Standard	The standard outlines the process, roles, and principles for preparing Luminor's annual and quarterly sustainability disclosures. The objective is to ensure accurate, fair, comprehensive, balanced, and timely disclosure of sustainability-related information. The process involves gathering information, validating and signing off disclosures, and obtaining approval from the Management Board and Supervisory Council. The disclosures are integrated into the Management Report and aligned with the European Sustainability Reporting Standards (ESRS), Corporate Sustainability Reporting Directive (CSRD), and other relevant regulations.
Sustainable Investment Due Diligence Procedure of Luminor Asset Management and Pension Companies	This procedure describes how ESG risks and adverse sustainability impacts are integrated into the investment decision making processes for Luminor Asset Management Subsidiaries. Following the SFDR provisions, our Sustainability Policy and the Sustainable Investment Guidelines, the procedure establishes different types of financial instruments with regards to their sustainability characteristics and sets out how the ESG due diligence assessment is executed for the financial instruments proposed for the pension funds. The regulation also defines roles and responsibilities for monitoring and reporting processes on sustainability-related disclosures.
Sustainable Investment Guidelines	The guidelines outline sustainable investment principles, including the ESG risk integration in the investment decision making process in Luminor Bank and its Asset Management Subsidiaries. The guidelines apply to direct and indirect investments in the provision of discretionary portfolio management services, management of pension funds, pension plans and pension schemes, and investment on our own account through Luminor liquidity bond portfolio management, and bond trading. The sustainable investment guidelines were developed in accordance with the Sustainable Finance Disclosure Regulation (SFDR), the United Nations Principles for Responsible Investment (UN PRI), the EU Action Plan for Financing Sustainable Growth, and other applicable legal acts.
Third Party Risk Management Standard	This Standard provides the principles for managing Third Party Risk across end-to-end Third Party Risk management lifecycle. It sets out the minimum principles for sourcing process, requirements for identifying critical agreements with third parties, including intragroup service providers, assigning roles and responsibilities across Three Lines, and overseeing management, monitoring, and governance of Third Party agreements and their risks. This Standard also defines reporting obligations within Luminor and to relevant regulatory bodies, as well as the escalation process for Third Party agreement related risks and events. The Standard is aligned with the relevant guidelines of EBA and ESMA, and the EU Digital Operational Resilience Act.
Whistleblowing Procedure	This Procedure ensures secure, clear and consistent process for reporting, investigating Whistleblowing Reports within Luminor, ensuring compliance with the EU and national laws and regulations, and protection for Whistleblowers against retaliation.

APPLICABILITY OF POLICIES, PROCEDURES, AND STANDARDS, BY ENTITY

Document	Luminor Bank	Leasing entities	Pension entities	Maksekeskus	Accountable
Adverse Media Screening Instruction	•	–	–	–	Head of the AFC Operations Department
Business Model Risk Policy	•	–	–	–	Supervisory Council
Code of Conduct (the Code) (a)	•	•	•	•	Supervisory Council
Code of Responsible Business Conduct for Third Parties (a)	•	•	•	•	Supervisory Council
Compliance Risk Policy	•	•	•	•	Supervisory Council
Conflict of Interest Management Standard (a)	•	•	•	•	Head of Advisory & Conduct Department
Customer Complaints, Feedback & Requests Handling Procedure (b)	•	•	•	–	Management Board
Being Human – Luminor guide to a memorable customer experience	•	–	–	–	Head of Customer Relationships Management Dept.
Data Protection Standard	•	•	•	–	Management Board
Data Quality Management Procedure	•	•	•	–	Head of Data Management Department
Data Specification for ESG Data Proxies	•	–	–	–	Head of Sustainability Department
Discretionary Portfolio Management ESG Due Diligence Procedure	•	–	–	–	Deputy Head of Investment Products Unit
Double Materiality Assessment Procedure	•	•	•	•	Management Board
ESG Data Management Procedure	•	–	–	–	Head of Sustainability Department
ESG Due Diligence Standard	•	•	–	•	Management Board
ESG Risk Assessment Procedure	•	•	–	–	Head of the Credit Risk Department
Individual Performance Management Procedure	•	•	•	–	Head of People & Culture Division
Industry ESG Risk Management Procedure	•	•	–	–	Head of the Credit Risk Department
Lending Risk Parameters for Private Individuals Procedure	•	•	–	–	Head of Retail Banking Business Development Dept.
Performance Management Procedure	•	•	•	–	Head of Finance Division
Procedure for Personal Transactions in Financial Instruments	•	•	•	–	Head of Advisory & Conduct Department
Procedure of Handling of Inside Information	•	•	•	–	Head of Advisory & Conduct Department
Product Management Procedure	•	•	•	–	Management Board
Remuneration Policy	•	•	•	–	Head of People & Culture Department
Risk Appetite Statement (RAS)	•	•	•	•	Supervisory Council
Risk Policy	•	•	•	•	Supervisory Council
Sourcing and Third-Party Management Procedure	•	•	•	–	Head of Sourcing & Third-Party Management Department
Speak-Up Procedure	•	•	•	•	Head of Conduct Department
Strategy Planning Procedure	•	–	–	–	CEO
Sustainability Policy	•	•	•	•	Supervisory Council
Sustainability Reporting Standard	•	•	•	•	Management Board
Sustainable Investment Due Diligence Procedure/... (c)	–	–	•	•	Management Boards of relevant entities
Sustainable Investment Guidelines (a)	•	–	•	–	Head of Sustainability Department
Third Party Risk Management Standard	•	•	•	–	Management Board
Whistleblowing Procedure	•	•	•	•	Chief Compliance Officer

a. Available on our website. All documents are available on our intranet, except Sustainable Investment Guidelines
b. And Standard of the same name;
c. of Luminor Asset Management and Pension Companies

5. CSRD Content Index

Standard	Disclosure title	Location in this report	Additional information
ESRS 2 – General disclosures			
BP-1	General basis for preparation of the sustainability statement	General information	5(e): Luminor is based in an EU member state that does not permit the exemption from disclosing impending developments or matters under negotiation, and so no exemption has been applied
BP-2	Disclosures in relation to specific circumstances	Change in presentation; Double Materiality Assessment and Sustainability Reporting Processes; Data Methodologies and limitations	
GOV-1	The role of the administrative, management and supervisory bodies	Governance overview	
GOV-2	Information provided to and Sustainability Matters addressed by the undertaking's administrative, management and supervisory bodies	Summary of reporting lines, management and oversight over Sustainability Matters	
GOV-3	Integration of sustainability-related performance in incentive scheme	Integration of sustainability related performance in the incentive scheme	
GOV-4	Statement on due diligence	Due Diligence processes	
GOV-5	Risk management and internal controls over sustainability reporting	Risk management and internal controls over sustainability reporting	
SBM-1	Strategy, business model and value chain	Strategy, business model and value chain	
SMB-2	Interests and view of stakeholders	Stakeholder engagement	
SMB-3	Material impacts, risks and opportunities and their interaction with strategy and business model	IRO in the strategy process	
IRO-1	Description of the process to identify and assess material impacts, risks and opportunities	Double Materiality Assessment and Sustainability Reporting Processes; Identifying material matters and IROs	
IRO-2	Disclosure requirements in ESRS covered by the undertaking's sustainability statement	General Requirements; Double Materiality Assessment and Sustainability Reporting Processes	
ESRS E1 – Climate change			
ESRS-2 GOV-3	Integration of sustainability-related performance in incentive schemes	Integration of sustainability related performance in the incentive scheme	
E1-1	Transition plan for climate change mitigation	Climate change	E1-1-16-(g): We are not excluded from the EU Paris-aligned Benchmarks according to the exclusion criteria stated in Articles 12.1 (d) to (g) and 12.2 of Commission Delegated Regulation (EU) 2020/1818. E1-1-16-(c) Financial resources allocated to action plan (OpEx) is not material
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Climate and environmental risk stewardship Resilience analysis	
ESRS 2 IRO-1	Description of the processes to identify and assess material climate-related impacts, risks and opportunities	Impacts, Risks and opportunities Focus area 1 – Climate Risk Framework and Resilience	
E1-2	Policies related to climate change mitigation and adaptation	Policies	
E1-3	Actions and resources in relation to climate change policies	Targets Actions	
E1-4	Targets related to climate change mitigation and adaptation	Targets	
E1-5	Energy consumption and mix	Operational Decarbonisation	E1-5-39: Luminor does not produce energy. E1-5-40: Not applicable, no own operations not in high climate impact sectors.
E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions	Operational Decarbonisation; Data Methodologies and limitations	
E1-7	GHG removals and GHG mitigation projects financed through carbon credit	Levers for reducing emissions	
E1-8	Internal carbon pricing		No internal carbon pricing schema in place
E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities		EC Delegated Regulation on postponements of ESRS obligations (C(2025) 4812)
ESRS E4 – Biodiversity and ecosystems			
E4-1	Transition plan and consideration of biodiversity and ecosystems in strategy and business model	Actions	
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Biodiversity and ecosystems	
ESRS 2 IRO-1	Description of the processes to identify and assess material climate-related impacts, risks and opportunities	Impacts, Risks and Opportunities	
E4-2	Policies related to biodiversity and ecosystems	Policies	
E4-3	Actions and resources related to biodiversity and ecosystems	Actions	EC Delegated Regulation on postponements of ESRS obligations (C(2025) 4812)

Standard	Disclosure title	Location in this report	Additional information
E4-4	Targets related to biodiversity and ecosystems	Targets	
E4-5	Impact metrics related to biodiversity and ecosystems change	-	Disclosure requirements omitted as either not applicable or voluntary
E4-6	Anticipated financial effects from biodiversity and ecosystem-related risks and opportunities		EC Delegated Regulation on postponements of ESRS obligations (C(2025) 4812)
ESRS E5 – Resource use and circular economy			
-	Progress and updates since last report	Resource use and circular economy	Requirements omitted as not material
ESRS S1 – Own workforce			
-	Progress and updates since last report	Own workforce	Requirements omitted as not material topic
ESRS S4 – Consumers and end-users			
ESRS 2 SBM-2	Interests and views of stakeholders	Impacts, Risks and opportunities	
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Impacts, Risks and opportunities	S4-ESRS 2 SBM-3-10-(b) Material negative impacts occurrence (consumers and end-users) is not applicable in 2025 as we did not identify any negative impacts.
S4-1	Policies related to consumers and end-users	Policies	
S4-2	Processes for engaging with consumers and end users about impacts	Actions	
S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	Raise your concern channel	EC Delegated Regulation on postponements of ESRS obligations (C(2025) 4812)
S4-4	Taking action on material impacts on consumers and end- users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	Actions	
S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Targets	
ESRS G1 – Business conduct			
-	Progress and updates since last report	Business conduct	Requirements omitted as not material
Business model resilience			
-	Progress and updates since last report	Business model resilience	Requirements omitted as not material
Cyber security			
-	Progress and updates since last report	Cyber security	Requirements omitted as not material

6. Datapoints that derive from other EU legislation

Disclosure requirement and related datapoint	SFDR reference (Annex 1)	Other information
Material		
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	Table 1, Indicator 13	BRR: Delegated Regulation (EU) 2020/1816, Annex II Sect: General information, Governance overview
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)		BRR: Delegated Regulation (EU) 2020/1816, Annex II Sect: General information, Corporate Governance report
ESRS 2 GOV-4 Statement on due diligence paragraph 30	Table 3, Indicator 10	Sect: General information, Due diligence processes
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14 (*)		Sect: Environmental information, Climate change
ESRS E1-4 GHG emission reduction targets paragraph 34	Table 2, Indicator 4	P3R: Template 3: Banking book, Climate change transition risk, alignment metrics BRR: Delegated Regulation (EU) 2020/1818, Article 6 Sect: Environmental information, Climate change, Targets
ESRS E1-5 Energy consumption and mix paragraph 37	Table 1, Indicator 5	Sect: Environmental information, Climate change, Operational Decarbonisation
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	Table 1, Indicator 1; Table 1, Indicator 2	P3R: Template 1: Banking book, Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity BRR: Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1) Sect: Environmental information, Climate change, Operational Decarbonisation
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	Table 1, Indicator 3	P3R: Template 3: Banking book, Climate change transition risk, alignment metrics BRR: Delegated Regulation (EU) 2020/1818, Article 8(1) Sect: Environmental information, Climate change, Operational Decarbonisation
ESRS E1-7 GHG removals and carbon credits paragraph 56 (*)		Sect: Environmental information, Climate change, Targets
ESRS E1-9 Exposure of the bench-mark portfolio to climate-related physical risks paragraph 66		BRR: Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II Sect: EC Delegated Regulation on postponements of ESRS obligations (C(2025) 4812)
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a) ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c)		P3R: Template 5: Banking book, Climate change physical risk: Exposures subject to physical risk. Sect: EC Delegated Regulation on postponements of ESRS obligations (C(2025) 4812)
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c).		P3R: Template 5: Banking book, Climate change physical risk: Exposures subject to physical risk. Sect: EC Delegated Regulation on postponements of ESRS obligations (C(2025) 4812)
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities paragraph 69		BRR: Delegated Regulation (EU) 2020/1818, Annex II Sect: EC Delegated Regulation on postponements of ESRS obligations (C(2025) 4812)
ESRS 2- IRO 1 - E4 paragraph 16 (a) i	Table 1, Indicator 7	Sect: Environmental information, Biodiversity and ecosystems, Impacts, Risks and Opportunities
ESRS 2- IRO 1 - E4 paragraph 16 (b)	Table 2, Indicator 10	Sect: Environmental information, Biodiversity and ecosystems, Impacts, Risks and Opportunities
ESRS E4-2 Sustainable land/ agriculture practices or policies paragraph 24 (b)	Table 2, Indicator 11	Sect: Environmental information, Biodiversity and ecosystems, Impacts, Risks and Opportunities
ESRS E4-2 Sustainable oceans/ seas practices or policies paragraph 24 (c)	Table 2, Indicator 12	Sect: Environmental information, Biodiversity and ecosystems, Impacts, Risks and Opportunities
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	Table 2, Indicator 15	Sect: Environmental information, Biodiversity and ecosystems, Impacts, Risks and Opportunities
Not material		
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	Table 1, Indicator 4	P3R: Table 1: Qualitative information on Environmental risk, and Table 2: Qualitative information on Social risk BRR: Delegated Regulation (EU) 2020/1816, Annex II
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d)	Table 2, Indicator 9	Delegated Regulation (EU) 2020/1816, Annex II
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	Table 1, Indicator 14	Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv		Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		P3R: Template 1: Banking book, Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity BRR: Delegated Regulation (EU) 2020/1818, Article 12.1 (d) to (g), and Article 12.2

Disclosure requirement and related datapoint	SFDR reference (Annex 1)	Other information
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	Table 1, Indicator 5; Table 2, Indicator 5	
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	Table 1, Indicator 6	
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Table 1, Indicator 8; Table 2, Indicator 1, 2, and 3	
ESRS E3-1 Water and marine resources paragraph 9	Table 2, Indicator 7	
ESRS E3-1 Dedicated policy paragraph 13	Table 2, Indicator 8	
ESRS E3-1 Sustainable oceans and seas paragraph 14	Table 2, Indicator 12	
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Table 2, Indicator 6.2	
ESRS E3-4 Total water consumption in m ³ per net revenue on own operations paragraph 29	Table 2, Indicator 6.1	
ESRS 2- SBM 3 - E4 paragraph 16 (c)	Table 2, Indicator 14	
ESRS E5-5 Non-recycled waste paragraph 37 (d)	Table 2, Indicator 13	
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	Table 2, Indicator 9	
ESRS 2- SBM3 - S1 Risk of incidents of forced labour paragraph 14 (f)	Table 3, Indicator 13	
ESRS 2- SBM3 - S1 Risk of incidents of child labour paragraph 14 (g)	Table 3, Indicator 12	
ESRS S1-1 Human rights policy commitments paragraph 20	Table 3, Indicator 9; Table 1, Indicator 11	
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21		BRR: Delegated Regulation (EU) 2020/1816, Annex II
ESRS S1-1 processes and measures for preventing trafficking in human beings paragraph 22	Table 3, Indicator 11	
ESRS S1-1 workplace accident prevention policy or management system paragraph 23	Table 3, Indicator 1	
ESRS S1-3 grievance/complaints handling mechanisms paragraph 32 (c)	Table 3, Indicator 5	
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	Table 3, Indicator 2	BRR: Delegated Regulation (EU) 2020/1816, Annex II
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	Table 3, Indicator 3	
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	Table 1, Indicator 12	BRR: Delegated Regulation (EU) 2020/1816, Annex II
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	Table 3, Indicator 9	
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	Table 3, Indicator 7	
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a)	Table 1, Indicator 10; Table 3, Indicator 14	BRR: Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)
ESRS 2- SBM3 - S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	Table 3, Indicator 12; Table 3, Indicator 13	
ESRS S2-1 Human rights policy commitments paragraph 17	Table 1, Indicator 11; Table 3, Indicator 9	

SFDR reference

Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (Sustainable Finance Disclosures Regulation) (OJ L 317, 9.12.2019, p. 1).

Pillar 3 reference ('P3R')

Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453

Benchmark Regulation reference ('BRR')

Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds and amending Directives 2008/48/EC and 2014/17/EU and Regulation (EU) No 596/2014 (OJ L 171, 29.6.2016, p. 1).

EU Climate Law reference

Regulation (EU) 2021/1119 of the European Parliament and of the Council of 30 June 2021 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 ('European Climate Law') (OJ L 243, 9.7.2021, p. 1).

Section of report ('Sect')

(*) Regulation (EU) 2021/1119, Article 2(1)

7. Datapoints from other legislation or sustainability standards

Name of metric	Standard or framework applied	Section in the report
Scope 3 financed emissions	PCAF, part A, Financed Emissions (December 2022). Addressed in ESRS E1-6-AR 46B	Environmental information, Climate change: Targets
Mortgage portfolio with EPC rating A or better, % of total mortgage exposure	Applied methodologies deriving from EU regulations 2010/31 and 2022/2453. Addressed in ESRS E1-9 AR 74B EPC data collected from customers and local EPC registries	Environmental information, Climate change: Targets
Financed emissions and carbon intensity	PCAF, part A, Financed Emissions (December 2022); Science-based Targets (SBTs). Addressed in ESRS E1-6-AR 46B.	Environmental information, Climate change: Targets
Total amount of green bonds outstanding (at year-end) divided by (a 5-year rolling average of) total amount of bonds outstanding	Reported based on following EU regulations: 2020/852 and 2021/2178. Addressed in e.g. ESRS 2 SBM-1, E1-1 and E5-3 Principles for evaluation based on Green Bond Principles (GBP) by the International Capital Market Association (ICMA) (June 2022)	Consolidated Sustainability Statement: At Glance; Environmental information, Climate change: Actions: Focus area 3 - Climate risk management of Financing and Investment Portfolios: Investment Activities

8. Subsequent events

In January 2026, we approved the new Sustainability Standard and updated ESG Risk Assessment Procedure integrating the customer engagement approach and biodiversity and nature services degradation related questions for high-risk agriculture customers into the related due diligence tooling.

In February 2026, we approved the risk mitigation approach and transition plans for Luminor ESG-related material risks and the related impacts that were deemed material in scope of 2025 Double Materiality Assessment process, including the C&E Transition plan. In February 2026, we completed the climate and environmental risk stress testing process.

GLOSSARY

Item	Description
Abbreviations	
AML/CFT/CFP	Anti-money laundering/ Countering the financing of terrorism/ Countering the financing of proliferation
Col	Conflict of Interest
DMA	Double Materiality Assessment
DPO	Data Protection Officer
ESG	Environmental, Social and Governance factors
GDPR	General Data Protection Regulation
IRO	Impacts, Risks and Opportunities
KYC	Know Your Customer
Terms	
Adverse or Potential Adverse Impact	Refers to a significant negative outcome, often challenging to reverse or remedy, affecting individuals, communities, and companies within relevant ecological, social, or economic systems. These impacts, stemming from ESG Risk Drivers, are categorised based on severity, nature, and likelihood into Low, Medium, High, and Critical levels.
Asset Management Subsidiaries	Luminor Pensions Estonia AS, Luminor Asset Management IPAS, Luminor Latvijas atklatais pensiju fonds AS and UAB Luminor Investiciju valdymas.
Board	Management Board of Luminor Bank AS.
Carbon related assets	Assets tied to the energy and utilities sectors under the Global Industry Classification Standard, excluding water utilities, independent power and renewable electricity producer industries. Carbon-related assets exposure is derived from EBRD Environmental risk mapping using NACE codes.
Climate & Environmental Risks on Business Environment (C&E RBE)	The procedure outlines the process for conducting the analysis. This assessment identifies C&E risks and opportunities we are exposed to through our activities in different NACE sectors and geographies
Climate & Environment Risk Materiality Assessment (C&E RMA)	Materiality assessment for the impact of drivers of Climate and Environmental Risk on risk types
Climate Delegated Act	Commission Delegated Regulation (EU) 2021/2139, which established the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation or climate change adaptation.
Council	Supervisory Council of Luminor Bank AS.
CRD Institutions	An undertaking whose business is to receive deposits or other repayable funds from the public and to grant credits for its own account' as per the Capital Requirements Directive.
Credit Institution Law	available from Estonian FSA: https://www.fi.ee/en/consumer/when-should-i-contact-finantsinspeksioon/notify-us-about-illegal-activities ; Latvian FSA: https://www.fktk.lv/en/about-us/whistleblowing/ , Lithuanian FSA: https://www.lb.lt/en/notification-of-corrupt-conduct
Disclosure Delegated Act	Commission Delegated Regulation (EU) 2021/2178 which specifies the content and presentation of information to be disclosed by undertakings subject to Articles 19a or 29a of Directive 2013/34/EU
European Green Bond Standard (EUGB)	A European Union framework that defines rules for issuing green bonds to ensure funds support environmental projects
ESG risk drivers	Environmental, Social or Governance matters that through counterparties, invested assets, value chain and other channels may adversely impact financial performance, solvency or liquidity of an enterprise.
EBRD industry classification	Risk classification based on EBRD Environmental and Social Risk Categorisation List. This list provides a guide to the typical level of inherent environmental and social risk related to particular business activities.
Energy Attribute Certificates (EACs)	Each EAC represents unique ownership of 1 MWh of renewable energy that has been produced. We buy these to offset our electricity consumption related emissions.

Item	Description
Energy performance certificates (EPCs)	A rating scheme to summarise the energy efficiency of buildings.
EU Taxonomy Regulation	Regulation (EU) 2020/852) is a classification system which defines which economic activities are environmentally sustainable.
EU Taxonomy report	Report published by an entity as required under EU Taxonomy Regulation following templates established in the Disclosure Delegated Act.
FINREP	A framework given by EBA for reporting financial (accounting) information to the regulator, applicable to all Credit Institutions in the European Union.
Forest Stewardship Council (FSC)	An organisation that promotes sustainable forestry practices, sets standards for forest products, and certifies these standards have been met.
Green Asset Ratio (GAR)	Shows the proportion of exposures related to Taxonomy-aligned activities compared to the total assets of the credit institutions.
Greenhouse gas emissions (GHG)	Own and financed emissions, by Scope. Financed emissions are calculated based on PCAF methodology, where GHG emissions data for some of the largest customers have been collected, while for the rest was estimated using PCAF database of emission factors.
GHG Protocol	An accounting standard that establishes comprehensive global standardised frameworks to measure and manage GHG emissions from private and public sector operations, value chains and mitigation actions.
Green Growth	Activities that foster economic growth and development, while ensuring that natural assets continue to provide the resources and environmental services on which our well-being relies.
Global Reporting Initiative (GRI)	A standard for reporting sustainability-related information.
Guide on climate-related and environmental risks	An ECB Guide on supervisory expectations relating to risk management and disclosure.
Leasing Subsidiaries	Luminor Liising AS, Luminor Lizings SIA, UAB Luminor Lizingas.
Materiality Assessment External Score Weighting used,	Benchmark (Corporate reports), 35%; Mandatory laws, 30%; Voluntary regulation, news, stakeholder Survey participants, each 10%; and, social media, 5%
NACE codes	The standard European nomenclature of productive economic activities.
Non-financial counterparty (NFCs)	An undertaking established in the European Union other than a financial counterparty (FC) or a Central Counterparties (CCP).
Non-Financial Reporting Directive (NFRD)	Directive 2014/95/EU of the European Parliament and of the Council as regards disclosure of non-financial and diversity information by certain large undertakings and groups
Net promoter score (NPS)	Measures customer loyalty and satisfaction by looking at their likelihood of recommending a given business, with a number ranging from -100 to +100.
NUTS3	Nomenclature of territorial units' statistics.
PAI	Measures of the negative environmental or social effects of investments, required to be assessed and disclosed under EU sustainability regulations
Partnership for Carbon Accounting Financials (PCAF)	The Partnership for Carbon Accounting Financials (PCAF) is a global, industry-led initiative that provides a standardized methodology for financial institutions to measure and disclose the greenhouse gas (GHG) emissions associated with their loans and investments, commonly referred to as financed emissions.
Pillar 3	The Risk Management and Capital Adequacy Disclosure report that is published on our website under https://luminor.ee/investors .
Science Based Targets (SBT)	Used to define emission reduction targets. SBTs follow a "top-down" approach and focus on the quantity of emissions that need to be reduced to meet the Paris Climate Agreement targets,
Scope 1	Direct GHG emissions, covers all direct GHG emissions by a company. It includes fuel combustion, company vehicles and fugitive emissions. These emissions are direct GHG emissions that happen from sources owned or controlled by an organization including fuel combustion in boilers, furnaces, vehicles.
Scope 2	Energy related indirect GHG emissions, covers indirect GHG emissions from consumption of purchased electricity, heat, cooling or steam. These emissions are a result of a company's activities but often occur outside a company's physical facility (e.g., at an electricity utility plant),

Item	Description
Scope 3	Other indirect GHG emissions and financed emissions, covers other indirect emissions, such as the extraction and production of purchased materials and fuels, transport-related activities in vehicles not owned or controlled by the reporting entity, outsourced activities and waste disposal.
SSP3-7.5	A high-emissions climate scenario combining limited global cooperation and high resource intensity, resulting in approximately 7.5 W/m ² radiative forcing by 2100 and significant physical climate risks.
RCP 8.5	A very high-emissions pathway reaching 8.5 W/m ² radiative forcing by 2100, commonly used to model severe physical climate impacts under low-mitigation assumptions.
RCP 6.0	A medium-high emissions pathway stabilising at 6.0 W/m ² radiative forcing by 2100, reflecting moderate mitigation efforts and associated medium physical-risk outcomes.
Sustainability Matters	Environmental, social and human rights, and governance factors, including sustainability factors defined in point (24) of Article 2 of Regulation (EU) 2019/2088.
Sustainable investments	Investment products that comply with the SFDR requirements for sustainable investments (Article 9 products) and investments promoting ESG characteristics (Article 8 products) as well as green bond investments, investments into EU taxonomy aligned instruments and social investments.
Sustainable lending	Lending for use of proceeds aligned to EU Taxonomy standards and/or other sustainable financing frameworks, such as the European Bank for Reconstruction and Development
tCO ₂ e	The sum of Scope 1 emissions, Scope 2 emissions and Scope 3 emissions, during a given period, measured in metric tonnes of carbon dioxide equivalent, according to GHG Protocol standards.
Time horizons	Short term, 2025 to 2027; medium term, 2028 to 2034; and, long term 2035-2050
United Nations Standard Development Goals (UN SDG)	17 Sustainable Development Goals adopted by the United Nations which aim to eradicate extreme poverty, reduce injustice and inequalities in the world, promote peace and justice and tackle the climate change and environmental protection.
(+)	Financial opportunity, Positive actual impact, Positive potential impact.
(-)	Financial risk, Negative actual impact, Negative potential impact.

ADDITIONAL DISCLOSURES REQUIRED BY ECB

Unaudited

Luminor own emissions

	2024				2025			
	Estonia	Latvia	Lithuania	Total	Estonia	Latvia	Lithuania	Total
Scope 1	5.0	10.2	16.1	31.3	5.1	10.3	16.3	31.7
Scope 2 (Market based)	686.8	120.0	204.9	1,011.7	584.3	118.3	224.4	927.0
Scope 3	516.3	485.9	525.5	1,527.7	383.6	567.7	329.8	1,281.1
Total own GHG emissions	1,208.1	616.1	746.5	2,570.7	973	696.3	570.5	2,239.8

Loan portfolio financed emissions by country, on balance sheet assets

	2024				2025			
	Exposure in scope, €m	Financed emissions, tCO ₂ e	Carbon Intensity, tCO ₂ e/€m	% of total financed emissions	Exposure in scope, €m	Financed emissions, tCO ₂ e	Carbon Intensity, tCO ₂ e/€m	% of total financed emissions
Mortgages								
Estonia	1,086.1	70,448	64.9	2.4	1,097.3	60,555	55.2	2.4
Latvia	1,379.1	48,029	34.8	1.7	1,490.3	24,007	16.1	0.9
Lithuania	2,962.4	123,085	41.5	4.2	3,327.3	67,015	20.1	2.6
Total	5,427.6	241,562	44.5	8.3	5,914.8	151,578	25.6	6.0
Motor vehicle loans								
Estonia	335.6	19,964	59.5	0.7	320.5	13,469	42.0	0.5
Latvia	354.3	20,476	57.8	0.7	382.2	15,559	40.7	0.6
Lithuania	632.8	34,042	53.8	1.2	756.4	28,340	37.5	1.1
Total	1,322.8	74,483	56.3	2.6	1,459.1	57,368	39.3	2.3
Corporate lending								
Estonia	867.2	381,997	440.5	13.2	1,059.1	369,017	348.4	14.6
Latvia	1,045.1	440,527	421.5	15.2	973.5	399,765	410.6	15.8
Lithuania	1,789.6	1,762,159	984.7	60.7	1,968.6	1,551,735	788.2	61.3
Total	3,702.0	2,584,683	698.2	89.1	4,001.2	2,320,517	580.0	91.7
Total	10,452.3	2,900,728	277.5	100.0	11,375.1	2,529,463	222.4	100.0

Luminor Scope 3 financed emissions and carbon intensity of corporate lending portfolio by sector

31 December 2025

	Exposure, €m	Financed emissions, tCO ₂ e	Carbon Intensity, tCO ₂ e/€m	% of total financed emissions
Real estate activities	1,209.2	53,425	44.2	2.3
Wholesale and retail trade	490.3	489,331	998.1	21.1
Manufacturing	522.0	1,045,583	2,003.1	45.1
Transportation and storage	114.2	39,499	345.9	1.7
Agriculture, forestry and fishing	283.1	264,853	935.5	11.4
Construction	116.4	50,822	436.6	2.2
Electricity, gas, steam and air conditioning	321.9	258,805	804.0	11.2
Water supply	41.6	7,176	172.4	0.3
Mining and quarrying	9.6	3,679	383.2	0.2
Other	892.9	107,342	120.2	4.6
Total	4,001.2	2,320,517	580.0	100.0

CONSOLIDATED FINANCIAL STATEMENTS

Consolidated Statement of Profit or Loss

€m	Notes	2024	2025
Interest income calculated using the effective interest method	3	709.4	542.3
Other similar income	3	92.4	71.6
Interest and similar expense	3	-294.1	-194.1
Net interest and similar income		507.7	419.8
Fee and commission income	4	120.6	119.4
Fee and commission expense	4	-31.0	-34.0
Net fee and commission income		89.6	85.4
Net gain from financial items	5	32.8	29.2
Other operating income		1.5	1.5
Share of profit from associates	12	1.2	1.3
Net other operating income		35.5	32.0
Total operating income		632.8	537.2
Personnel expenses	6	-147.4	-153.6
Other administration expenses	7	-175.0	-166.2
Depreciation, amortisation, and impairment	13,14	-20.5	-19.4
Gain (-loss) on derecognition of non-financial assets - net		-2.1	-5.8
Total operating expenses		-345.0	-345.0
Profit before credit losses, bank taxes, and tax		287.8	192.2
Expected credit losses	11	1.3	1.9
Bank taxes	8	-33.4	0.0
Profit before tax		255.7	194.1
Income tax expense	22	-53.5	-36.4
Profit for the period		202.2	157.7
Total comprehensive income		202.2	157.7
Profit for the period attributable to:			
Additional Tier 1 capital holders		-	9.8
Shareholder of Luminor Bank		202.2	147.9
Profit for the period		202.2	157.7

The accompanying Notes form an integral part of these financial statements.

Consolidated Statement of Financial Position

€m	Notes	31 Dec 2024	31 Dec 2025
Assets			
Cash and balances with central banks	9	3,106.3	1,937.6
Balances with banks		63.6	55.5
Debt securities	10	1,670.2	2,092.3
Loans to customers	11	10,535.4	11,491.4
Derivatives	21	77.9	57.9
Equity instruments		3.5	4.2
Investments in associates	12	5.9	6.1
Intangible assets	13	49.3	37.0
Tangible assets	14	22.3	25.7
Current tax assets		1.5	6.0
Deferred tax assets	22	4.9	5.3
Other assets	15	182.9	183.0
Total		15,723.7	15,902.0
Liabilities			
Loans and deposits from credit institutions		192.9	142.6
Deposits from customers	16	11,352.7	11,510.7
Fair value of changes of hedge items in portfolio hedges of interest rate	21	6.2	4.7
Debt securities issued	17	2,238.0	2,165.5
Derivatives	21	35.6	21.8
Tax liabilities	22	22.3	8.0
Deferred tax liabilities	22	0.7	2.3
Lease liabilities	14	20.0	24.3
Other liabilities	18	134.4	107.1
Provisions	20	34.5	30.0
Total		14,037.3	14,017.0
Equity			
Share capital		34.9	34.9
Share premium		1,412.2	1,412.2
Retained earnings		235.7	286.7
Other reserves		3.6	3.5
Shareholder equity		1,686.4	1,737.3
Additional Tier 1 capital	19	–	147.7
Total		1,686.4	1,885.0
Total liabilities and equity		15,723.7	15,902.0

The accompanying Notes form an integral part of these financial statements.

Consolidated Statement of Changes in Equity

€m	Share capital	Share premium	Retained earnings	Other reserves	Shareholder equity	Additional Tier 1 capital	Total
Balance as at 31 December 2023	34.9	1,412.2	327.5	3.5	1,778.1	-	1,778.1
Profit for the period	-	-	202.2	-	202.2	-	202.2
Total comprehensive income	-	-	202.2	-	202.2	-	202.2
Distributions	-	-	-	-	-	-	-
Dividends	-	-	-294.5	-	-294.5	-	-294.5
Other	-	-	0.5	0.1	0.6	-	0.6
Balance as at 31 December 2024	34.9	1,412.2	235.7	3.6	1,686.4	-	1,686.4
Balance as at 31 December 2024	34.9	1,412.2	235.7	3.6	1,686.4	-	1,686.4
Profit for the period	-	-	152.2	-	152.2	5.5	157.7
Total comprehensive income	-	-	152.2	-	152.2	5.5	157.7
Distributions	-	-	-	-	-	-5.5	-5.5
Dividends	-	-	-101.1	-	-101.1	-	-101.1
Other	-	-	-0.1	-0.1	-0.2	147.7	147.5
Balance as at 31 December 2025	34.9	1,412.2	286.7	3.5	1,737.3	147.7	1,885.0

Shares and dividends

	31 Dec 2024	31 Dec 2025
Share capital, authorised registered ordinary shares of €10 each	12,000,000	12,000,000
of which issued and fully paid	3,491,223	3,491,223
Dividends paid in the year, €m	294.5	101.1
Dividends paid in the year, per share, €	84.35	28.96
Dividend paying capacity, €m	235.7	286.7
Corresponding income tax payable, €m	59.5	58.4

The accompanying Notes form an integral part of these financial statements.

Consolidated Statement of Cash flows

€m	Notes	2024	2025
Profit before tax		255.7	194.1
Adjustment for non-cash items:			
Credit loss allowance	11	-1.5	-1.9
Depreciation, amortisation, and impairment	13,14	20.5	19.4
Derecognition of non-financial assets	13,14	2.1	6.3
Gain/loss on derecognition of associates		-	-0.9
Other non-cash items		-1.2	-1.5
Interest and similar income	3	-801.8	-613.9
Interest and similar expense	3	294.1	194.1
Change in operating assets/liabilities:			
Increase (-) / decrease (+) of lending to customers		-39.5	-958.3
Increase (-) / decrease (+) of debt securities		-175.6	-414.2
Increase (-) / decrease (+) of other assets		36.7	17.0
Increase (+) / decrease (-) of deposits from customers		74.6	168.6
Increase (+) / decrease (-) of other liabilities		-44.3	-69.5
Interest received		787.4	603.2
Interest paid		-303.8	-210.4
Income tax paid		-53.9	-54.0
Cash flow used in operating activities		49.5	-1,121.9
Payment for acquisition of subsidiary, net of cash acquired	12	-	-0.1
Acquisition of tangible and intangible assets	13,14	-12.9	-10.1
Proceeds from disposal of tangible and intangible assets	13,14	0.2	0.0
Proceeds from disposal of investment in associate		-	0.9
Dividend received		1.3	1.1
Cash flows used in investing activities		-11.4	-8.2
Debt securities and Additional Tier 1 instruments issued	17, 19	542.8	945.9
Debt securities redeemed or matured	17	-227.0	-880.8
Payments of principal on leases		-6.1	-5.2
Distributions paid on additional Tier 1 capital		-	-5.5
Dividends paid		-294.5	-101.1
Cash flows from / (used in) financing activities		15.2	-46.7
Net increase or decrease in cash and cash equivalents		53.3	-1,176.8
Cash and cash equivalents at the beginning of the period		3,116.6	3,169.9
Effects of currency translation on cash and cash equivalents		0.0	0.0
Net increase or decrease in cash and cash equivalents		53.3	-1,176.8
Cash and cash equivalents at the end of the period		3,169.9	1,993.1
Cash and cash equivalents			
Cash on hand	9	120.4	120.0
Non-restricted current account with central bank	9	2,985.9	1,817.6
Due from other credit institutions within three months		63.6	55.5
Total		3,169.9	1,993.1

The accompanying Notes form an integral part of these financial statements.

NOTES TO THE CONSOLIDATED FINANCIAL STATEMENTS

1. Material accounting policy information

Luminor Bank AS (which, together with its subsidiaries, is referred to as 'Luminor', below) is a credit institution with its headquarters in Tallinn. Luminor is owned by Luminor Holding (which is controlled ultimately by BCP VII, an investment fund managed by an affiliate of Blackstone) which, in turn, is owned by a consortium led by private equity funds managed by Blackstone (80.05%) and DNB Bank (19.95%). These consolidated financial statements for the year ended 31 December 2025, which have been prepared on a going concern basis, were approved by the Management Board on 24 March, the Supervisory Council on 26 March, and by the shareholder on 26 March 2026.

BASIS OF PRESENTATION

The Consolidated financial statements (the Statements) of Luminor are prepared in accordance with International Financial Reporting Standards (the Standards) as endorsed by the European Union. In addition, Luminor has adopted the EU carve-out version of IAS 39 to hedge the interest rate risk on a portfolio of non-maturing core deposits. The Statements are prepared under the historical cost convention, except for financial instruments measured at fair value through profit or loss (FVTPL) or other comprehensive income (FVTOCI), as well as financial assets and liabilities designated as hedged items in qualifying fair value hedging relationships which are measured at amortised cost with adjustments for hedging gain or loss. In the primary financial statements of Luminor as a separate entity which are disclosed in these Statements (Note 32, below), the investments in subsidiaries are carried at cost less impairment.

The material accounting policy information and significant accounting estimates and judgements applied in the preparation of these Statements are set out below. Luminor's functional and presentation currency is the euro (EUR) and, unless otherwise stated, all amounts are reported in millions of euros to one decimal place. Monetary assets and liabilities denominated in foreign currencies are translated into euro at the official rate of the European Central Bank at the reporting period end.

Certain new Standards, amendments and interpretations to existing Standards, came into effect for accounting periods beginning after 1 January 2025 or later periods. Amendments to Standards which became effective for annual periods beginning on or after 1 January 2025, include amendments to IAS 1, IFRS 16, IAS 7, IAS 21 and IFRS 7. The impact of applying these changes is not material. The International Accounting Standards Board has issued amendments to existing international accounting standards (IAS 7, IAS 21, IFRS 7, IFRS 9 and IFRS 10) and new standard IFRS 19 that have not yet come into force. None of the amendments is expected to have a significant impact on Luminor's financial statements. There will be impact on the structure and disclosures of the Statements from the implementation of the new standard IFRS 18 (effective as of 1 January 2027), significance of which is currently being analysed.

FEE AND COMMISSION INCOME AND EXPENSE

Fees and commission income is recognised either over time as the services are rendered, when the customer simultaneously receives and consumes the benefits provided by Luminor's performance, or at a point in time when Luminor satisfies its performance obligation, usually upon execution of the underlying transaction. The amount of fee or commission received, or receivable, represents the transaction price for the services identified as distinct performance obligations.

Fees and commission recognised over time include fees for account maintenance, servicing, and subscription, portfolio and other asset management advisory and services, wealth management and financial planning services, or fees for servicing loans on behalf of third parties (except for those subject to effective interest rate). Variable fees are recognised only to the extent that Management determines that it is highly probable that a significant reversal will not occur. Fees and commission recognised at a point in time include fees for arranging a sale or purchase of foreign currencies on behalf of a customer, processing payment transactions, cash settlements, collection or cash disbursements, and other commissions. Fee and commission expense is recognised as the service is being received (accrual basis) and when liability has been incurred.

TEMPORARY BANK TAXES

Effective January 2024 the Government of Latvia enacted a temporary tax on credit providers as an amendment to the Latvian 'Consumer Rights Protection Law'. This tax was levied on credit providers at a rate of 2% per annum of their total mortgage loan portfolio as at 31 October 2023. The tax, which is payable at a rate of 0.5% per quarter, remained in force through 2024.

In 2024, Latvia enacted a second temporary bank tax, to be levied for three years starting in 2025 at a rate of 60% on the net interest income that exceeds the average annual net interest income for the financial years 2018–2022 by more than 50%. The amount of taxable income may be reduced if a certain rate of credit growth is attained. Lithuania extended until December 2025 a temporary tax introduced in 2023 on the selected income of banks earned within its jurisdiction. The tax is levied at a rate of 60% on the net interest income generated in each of the years 2023, 2024, and 2025 from loans that were issued to customers before 31 December 2022, if the net interest income generated exceeds the average net interest income of the preceding four financial years by more than 50%. The expenses on both taxes are accounted for according to IAS 37/ IFRIC 21.

CASH AND BALANCES WITH CENTRAL BANKS

In the Statements of cash flows, cash and cash equivalents comprise cash balances, non-restricted balances due from the central banks, and amounts due from other credit institutions with original maturity of less than 3 months and insignificant risk due to change in value but excludes mandatory cash balances with central banks, which represent non-interest-bearing mandatory reserve deposits which are not available to finance Luminor's day to day operations.

SYNTHETIC SECURITISATION

Loans subject to synthetic securitisation remain on balance sheet, with credit protection realised through purchase of guarantees. Any impairment allowances for expected credit losses are calculated without consideration of the guarantee protection bought. The reimbursement right under the guarantees are recognized as an asset and reflected in net other finance income once it is virtually certain that the reimbursement amount for qualifying losses will be received. The related guarantee fees are accounted as other administrative expenses.

TANGIBLE AND INTANGIBLE ASSETS, LESSEE CONTRACTS ACCOUNTING

Tangible assets are recorded at cost minus accumulated depreciation and impairment losses. Equipment is depreciated between 20 and 33% per annum, and property between 1% and 2% per annum. For property leases Luminor uses its own funding cost as a discount rate. For other assets Luminor uses the interest rate implicit in the lease. Payments associated with leases with a 12-month term or less, or with a value of less than 5,000 EUR, are recognized on a straight-line basis as an expense in profit or loss. Intangible assets are carried at cost minus accumulated amortisation and impairment losses and amortised over 3 to 5 years.

IMPAIRMENT OF GOODWILL

Luminor tests whether goodwill has suffered any impairment at least annually or more frequently if indications of impairment exist. For 2024 and 2025, the recoverable amount of the cash-generating units was determined based on value-in-use calculations which require the use of assumptions. The calculations use discounted cash flow method covering the period of ten years. Beyond ten-years projections are made using estimated industry growth rates relevant to the cash-generating unit.

HEDGE ACCOUNTING

At the inception of a hedge relationship, Luminor formally designates and documents the hedge relationship to which it wishes to apply hedge accounting and the risk management objective and strategy for undertaking the hedge. The documentation includes identification of the hedging instrument, the hedged item, the nature of the risk being hedged and how Luminor will assess whether the hedging relationship meets the hedge effectiveness requirements (including the analysis of sources of hedge ineffectiveness and how the hedge ratio is determined).

A hedging relationship qualifies for hedge accounting if it meets all of the following effectiveness requirements: there is 'an economic relationship' between the hedged item and the hedging instrument; the effect of credit risk does not 'dominate the value changes' that resulting from that economic relationship; the hedge ratio of the hedging relationship is the same as that resulting from the quantity of the hedged item that Luminor actually hedges and the quantity of the hedging instrument that Luminor actually uses to hedge that quantity of the hedged item.

Luminor applies hedge accounting according to IFRS 9 Financial instruments to fair value hedges of euro-denominated senior preferred and covered bond Debt securities issue, and to part of Deposits from customers according to EU carve-out version of IAS 39. Luminor enters into interest rate swaps to hedge its Debt securities issued and part of deposit portfolio and applies a fair value hedge. Changes in the fair value are presented under "Net gain (-loss) from financial instruments at fair value" in the Statement of Profit or Loss. Interest income and expense from financial instruments (hedged item) are presented as "Net interest and similar income". The changes in the fair value of the hedged Debt securities issued attributable to the hedged risk are recognised as an addition to or deduction from the balance sheet value of financial liabilities and presented under "Net gain (-loss) on financial instruments at fair value" in the income statement.

The carrying amount of the derivatives used to hedge Deposits from customers are included in line item 'Derivatives' in the Statement of Financial Position, on either the Assets or Liabilities side depending on the fair value of the instruments, whereas portfolio hedging effect is recognised as 'Fair value of changes of hedged items in hedges of interest rate' in the Statement of Financial Position, on Liabilities side corresponding to the change in fair value of designated customer deposits discounted at market interest rates.

CORPORATE INCOME TAX

Quarterly profits of credit institutions in Estonia are subject to advance corporate income tax at a rate of 18% (previously 14%). The profit of a quarter can be reduced by losses of up to 19 previous quarters. Quarterly advance corporate income tax payments can be offset by the corporate income tax liability, charged at a rate of 22% arising from profit distribution. If no dividends are paid, the quarterly advance corporate income tax payments are not refunded. Corporate income tax payable on the quarterly profits is recognised as a current income tax expense. Deferred tax asset (and deferred tax income) on quarterly losses is recognised only if it is probable that future taxable profits will be available during 19 subsequent quarters to utilise those losses. The corporate income tax arising from the payment of dividends is accounted for as an expense in the period when dividends are declared, regardless of the actual payment date or the period for which the dividends are paid.

Since 2024, Latvia introduced annual mandatory prepayment of corporate income tax for credit institutions and consumer credit service providers, at a rate of 20% on prior year after-tax profit. Payments were reduced by the amount of tax paid on profits already distributed in the tax year. Accruals for mandatory prepayment of corporate income tax were created in 2025. Prior 2024 in Latvia, corporate income tax was charged upon distribution of profits or conditionally distributed profit at the rate of 20% of the gross amount. Corporate income tax on distributed profit was recognised when the shareholders of Luminor decided on profit distribution. Corporate income tax was recognised as expenses in the profit and loss calculation in the reporting period when the dividends or conditional dividends were calculated, whereas for other objects of conditionally distributed profit corporate income tax was recognised at the moment when the expenses occurred within the reporting period.

In Lithuania the standard corporate income tax rate is 15%. For profits of credit institutions in excess of 2 million EUR the income tax rate is 20%. Expenses related to taxation charges and included within these financial statements are based on calculations made by Luminor in accordance with the Lithuanian tax legislation.

ISSUED DEBT AND EQUITY INSTRUMENTS

Luminor issues financial instruments either classified as a financial liability or equity. Issued financial instruments are classified as financial liabilities if the contractual arrangements result in having a present obligation to either deliver cash or another financial asset or a variable number of equity instruments to the holder of the instrument. If this is not the case, the instrument is generally an equity instrument and classified as equity, net of transaction costs.

In February 2025 Luminor issued an Additional Tier 1 (AT1) Temporary Write Down Notes (perpetual subordinated instrument) which will be written down temporarily in case a pre-defined CET1 trigger level is breached. Interest payments are fully discretionary and mandatorily cancelled in certain circumstances. These instruments are classified as equity in accordance with IAS 32 as there is no requirement for Luminor to pay interest or principal to the noteholders. AT1 instruments are initially recognised at the fair value of proceeds received, net of directly attributable transaction costs, which are deducted from equity. These instruments are not subsequently remeasured. Distributions on AT1 instruments are recognized directly in equity when declared. Cancellation of distributions does not create a liability or result in a profit or loss impact.

CONTINGENT LIABILITIES

Luminor originates off-balance sheet financial instruments consisting of commitments to provide loans, including factoring, guarantees, and financial (loan repayment) guarantees and commercial letters of credit. Such instruments are recorded in the Statement of Financial Position when they are funded, or related fees are incurred or received. All these items are initially recognised at their fair value, which is normally evidenced by the amount of the contract. These amounts are amortised on a straight-line basis over the life of the contract. At each balance sheet date, the issued financial guarantees are measured at the higher of either the unamortised balance of the amount after initial recognition or an expected credit loss (ECL) amount calculated in accordance with IFRS 9.

MEASUREMENT OF OPERATING ('CUSTOMER') SEGMENTS PERFORMANCE

Luminor's Management Board, its Chief Operating Decision Maker (CODM), monitors separately the operating results of its Customer segments – Retail Banking and Corporate Banking (including Maksekeskus). The results of all other operations are included in the 'Other' segment. Segment results consist of income and expenses associated directly with the customers belonging to each segment and income and expenses not booked at a customer level, which are allocated between the operating segments using internally agreed allocation methods. Operating expense allocation to the respective segments and products is carried out by activity-based costing. Only assets and liabilities relating to customers which belong to the segments are reported under the respective segments. Loans and Deposits are reported at net carrying amounts including accrued interest and net of credit impairments. Credit loss allowances on loans to customers are monitored for each of the segments. See Note 27, 'Customer segments', below.

SIGNIFICANT ACCOUNTING ESTIMATES AND JUDGEMENTS

Fair value of financial instruments

The carrying amount of the part of Luminor's assets and liabilities is a reasonable approximation of their fair value.

Methodology followed to fair value Financial instruments:

Level	Description
1	Unadjusted quoted prices in active markets for identical assets or liabilities
2	Observable inputs, other than quoted prices included within Level 1, are observable for the asset or liability
3	Unobservable inputs for the asset or liability

See also Note 25, 'Fair value of financial assets and liabilities', below.

Methods and assumptions used to estimate fair value

Instrument	Methods and assumptions used to estimate fair value
Cash and balances with central banks	Carrying amount
Balances with banks	Carrying amount
Loans to customers	Future cashflows discounted using the sum of the EURIBOR base rate curve and average new sales margin of the reporting quarter. For mortgages the average new sales margin of mortgages of the reporting quarter is added to the base rate curve
Debt securities	If issued in the Baltic states, quotes from Baltic market makers. If issued outside the Baltic states, or there are no quotes available from local market makers, or the quotes are clearly incorrect or artificial, market data
Equity instruments	If Baltic-listed equities, the quotes of Baltic market makers. Other listed equities, market data. For equities of non-listed companies for which active market does not exist, any available trusted public information on recent trades or dividend discount model
Interest-bearing financial instruments	Discounted cash flows using interest rates for items with similar characteristics
Derivatives	Valuation is performed using generally accepted valuation models with inputs based on observable market data.
Loans and deposits from credit institutions	Carrying amount
Deposits from customers	Term deposit future cashflows discounted using the sum of the EURIBOR base rate curve
Debt securities issued	Market data

Impairment of financial instruments

Luminor's ECL calculations are outputs of complex models with a number of underlying assumptions regarding the choice of variable inputs and their interdependencies. The accounting judgements and estimates of the ECL models are described in the Note 2, 'General risk management policies', below.

2. General risk management policies

Luminor's risk management policies balance the rewards of taking risk to generate income with the risk of loss. Luminor ensures that all material risks are identified, assessed, treated, monitored, controlled and reported. Luminor's Risk division is an independent function responsible, in cooperation with Compliance division, for ensuring that Luminor has an appropriate risk management framework and for verifying that Luminor's divisions operate within this framework. Risk management is organised so that any possible conflicts of interest are avoided or escalated, should they occur.

CREDIT RISK

Credit risk is defined as the risk that a debtor or counterparty is unable to meet their obligations as they fall due, in part or in full. Credit exposures arise primarily from lending activities, including contingent liabilities, and from purchasing debt securities. Note 24, below, details Luminor's maximum exposure to credit risk.

The principles of Luminor's credit risk management are outlined in Luminor's Credit Risk Policy. The application of these principles and decision-making processes are regulated by relevant internal regulations. Luminor's principal objective for lending is that the loan portfolio must have quality and a composition that ensures profitability in the short and long term by maintaining a low to moderate risk profile. The assessment of creditworthiness is based on the customer's ability and willingness to meet their contractual obligations. Cash flows from customers' activities dedicated for loan payments must be clearly understandable and sustainable.

In 2025, credit decisions were made by the Group credit committee and by individuals according to decision-making authorisations, based on their competence level. Regular reports are prepared and presented to Luminor's Management Bodies to monitor the portfolio composition, to follow the level and development of the assumed credit risk, and to take corrective actions when needed.

Credit risk measurement

Loans to customers

Credit risk is managed by analysing the customer before granting any credit and by monitoring after credit disbursement. Luminor measures credit risk using rating models that estimate Probability of Default (PD), Loss Given Default (LGD), and Exposure at Default (EAD).

Rating models, which estimate PD and risk grade, are used to assess the default risk of the counterparty. The assessment is made by using the customer segment/product-specific rating models for six homogeneous groups of customers: individuals, large corporates, corporates, small and medium-sized enterprises, microbusinesses, and real estate projects of legal entities. All credits granted to Retail customers are re-classified using these rating models every time a commitment is renewed. Where the rating process is more automated, the risk estimates are reviewed on a quarterly basis. Ratings assigned to larger Corporate customers are reviewed at least once a year.

Luminor's internal rating scale for customers and the indicative mapping of external ratings

Risk level	Rating grade	Probability of default	Fitch, Standard & Poor's	Moody's
Low risk	1 to 4	<0.75%	AAA to BB+	Aaa to Ba1
Moderate risk	5 to 7	0.75% to 3%	BB to BB-	Ba2 to Ba3
High risk	8 to 10	>3%	B+ to C	B1 to Ca
Default	11 and 12	100%	D	C

The PD models rely on internal and external information. Internal information incorporates information on delinquencies, account behaviour and set-up of the loan, while external data includes social demographic aspects, late payments, financials, and leverage. The LGD models are based on the historically realised loss for different collaterals, customer segments, and types of facilities. The EAD models estimate exposure at default and are segmented across customer types and facility groups.

In addition to credit decision-making, internal model outputs are used in credit pricing, loan portfolio quality monitoring, and risk reporting, as well as economic capital (risk-adjusted capital (RAC)) calculations, capital allocation, and stress testing. When

a loan is granted to a large business customer, a risk-adjusted return on risk-adjusted capital (RAROC) is calculated, measured at both the individual loan and customer levels. The same principles of RAC-based pricing as well as RAROC-based profitability assessment are also extended to the other segments of the loan portfolio through standardised pricing tools or rules.

Luminor performs an ESG risk assessment as part of its assessment of the customer's creditworthiness. The extent of the assessment depends on the ESG risks identified. If ESG risks are high, for exposures above a certain threshold, the customer's risk grade is adjusted by one grade, which affects the probability of default. In 2025, the risk grade of several corporate customers was changed, though all remained within Stage 1, and hence the impact on ECL was not material. For other exposures, their risk mitigation capacity is assessed.

Balances with banks

Counterparty risk of banks and financial institutions is managed by establishing risk limits for investment-grade counterparties and then by monitoring those counterparties. If an investment-grade counterparty does not exist in a country, the best available counterparties from that country are chosen. All counterparty banks are risk classified, and risk limits are established. The risk grade and PD of banks and countries are based primarily on external ratings from recognised credit rating agencies. If an external rating for a counterparty is unavailable, Luminor will derive its own internal rating based on assessment of macroeconomic factors, the counterparty's own solvency and liquidity, and qualitative factors. All counterparties and countries are monitored on a quarterly basis, and limits are reviewed at least annually.

Debt securities

Luminor invests in debt securities in its banking book and trading book. Debt securities in the banking book are generally held-to-maturity and are classified as Amortised cost, FVTPL (designated or held mandatorily), or FVTOCI depending on business model or other criteria mandated by IFRS 9. Debt securities in the trading book, which are classified as held-for-trading, are used to provide secondary market liquidity.

Credit risk limit control and mitigation policies

Concentration risk

Luminor manages concentration risk by limiting exposure to sectors and customers. Lending to individual sectors is capped in general at 20% of total lending to legal entities, with exceptions for real estate (30%) and construction (10%). Luminor limits consumption of its economic capital for the 10 largest customer groups to 50 million EUR and, in addition, has a single name concentration limit (excluding state and municipality risk) of 180 million EUR.

Collateral

Luminor mitigates credit risk through collateral. Long-term financing and lending to business customers is generally secured. Consumer loans (including credit card limits) to individual customers are usually unsecured. Upon the initial recognition of loans to customers, the fair value of collateral is established. For real estate, market values estimated by external valuers or the purchase price, whichever is lower, are used, while for movable assets, book value is typically used. The value of collateral is monitored and reconsidered periodically. A statistical revaluation is performed periodically for residential real estate by applying relevant indices. For leased assets, after origination, the market value is adjusted by the depreciation of the movable asset. When calculating collateral realisation value, a discount is applied, the amount of which depends on different factors, including the type of collateral and expected realisation time.

Derivatives

Luminor's counterparty credit risk represents the potential loss incurred to replace derivative contracts if counterparties fail to meet their obligations. Luminor assesses counterparties' creditworthiness in conjunction with its derivatives exposure to control the level of credit risk taken. Counterparty credit risk is managed primarily using exposure limits, exchange of collateral and valuation adjustments to reported fair values.

Credit-related commitments

Commitments are collateralised in general either by the funds held in a Luminor account, tangible assets, or other collateral.

Credit impairment policies

Principles

Luminor recognises credit losses in accordance with the requirements of IFRS 9 applying a forward-looking expected credit loss approach. Luminor classifies loans, and other credit instruments, into one of three stages:

Stage	Status of financial instrument	ECL horizon	Amount on which interest is calculated
1	No significant increase in credit risk since initial recognition or low credit risk	12-months	Gross carrying amount
2	Significant increase in credit risk since initial recognition but not credit-impaired	Lifetime	Gross carrying amount
3	Credit-impaired	Lifetime	Gross carrying amount less loss allowance

Luminor's expected credit loss calculation models have a number of underlying assumptions regarding the choice of variable inputs and their interdependencies. These include:

- evaluating the criteria for assessment of a significant increase in credit risk (SICR) and allocation of loans to Stage 1 or 2,
- identification of unlikelihood to pay criteria and assignment of loans to Stage 3,
- classification of forbearance and watch list,
- assessing accounting interpretations and modelling assumptions used to build the models that calculate ECL, including the various formulas and the choice of inputs,
- the modelling and calculation of key parameters of the expected credit loss (ECL) models, including probability of default (PD), loss given default (LGD), and exposure at default (EAD),
- determining the macro-economic indicators and incorporating forward-looking information into the ECL models,
- estimating the above-mentioned indicators for future periods and for three different scenarios (baseline, optimistic, and pessimistic), and assigning probabilities to those scenarios,
- estimating ECL under base case and risk case scenarios for individually assessed Stage 3 assets, and assigning probabilities to those scenarios,
- setting principles for Stage 3 immaterial assets collective assessment,
- assessing the necessity of Management overlay adjustments to ECL models and determining the magnitude of the adjustments.

Where possible, Luminor seeks to restructure loans rather than take possession of collateral. This involves mostly adjusting the borrower's payment schedule to match their financial capacity, such as reducing temporarily principal repayments or extending payment terms, and agreeing on new loan conditions. Once the terms have been renegotiated and executed, a loan is no longer considered non-performing as long as the borrower complies with the renegotiated terms and conditions. Such loans are reviewed continuously to ensure all criteria are met and that future payments are likely to occur, and interest and fee income is accrued and recognised as for other performing loans.

Significant increase in credit risk ('SICR')

A financial asset is treated as facing a SICR if one of five indicators is identified after initial recognition of the financial instrument and was not present at its origination. All indicators are applied at a financial instrument level in order to track changes in credit risk since the initial recognition date for a particular financial instrument, even though some of them refer to a customer's characteristics. SICR indicators are:

- significant increase of lifetime PD since initial recognition until the reporting date (2.5 times and 1.0 p.p. jointly),
- risk grade 9 or 10 as at the reporting date,
- more than 30 days past due on any material overdue amount to Luminor as at the reporting date,
- forborne (restructured) performing status as at the reporting date (forbearance not triggering non-performing status),
- watch list status as at the reporting date.

The probability of default over the lifetime of a financial asset (cumulative lifetime PD), conditional on macroeconomic scenarios, is calculated as a weighted sum of point-in-time (PIT) forward-looking PDs generated for every future year until maturity of the financial instrument. For the indicator of more than 30 days past due, the same principles for counting days past due, considering materiality thresholds, are applied as for default identification, as below. In case of payment holidays, the counting of days past due is based on the modified payment schedule.

Return to Stage 1 is possible no earlier than 3 months after >30 days past due SICR trigger ceases to be met. During those 3 months of the probation period, the customer must make payments due in a timely fashion. No probation period is applied for backward transfer from Stage 2 in respect of other SICR indicators, as the probation period is already integrated in the reversal of those SICR triggers, e.g., a minimum 2-year probation period for forborne performing exposures to become fully performing.

Expected credit losses

A collective assessment of impairment is performed for all financial instruments that are not defaulted as at the reporting date. The expected loss is calculated as the probability-weighted average of losses expected in different macroeconomic scenarios. The expected loss in the specific macroeconomic scenario is calculated as the multiple of PD, LGD, EAD, and cumulative prepayment rate and is calculated using a discount rate. PD, LGD, and EAD curves are estimated for every future year until the maturity date of the facility. The ECL horizon varies with the Stage of the facility.

Estimation of PD and LGD curves considers forecasts of macroeconomic data. Luminor economists forecast this data three years ahead and propose scenario probabilities. From the fourth year, it is assumed that PD and LGD converge to their long-term average. Annual change in real GDP, wage growth, Harmonised Index of Consumer Prices (HICP), and the unemployment rate are used when modelling for customers of Corporate Banking, while modelling for customers of Retail Banking also includes the annual change in residential real estate prices.

Three-year projections of macroeconomic variables and probability weights are prepared for each Baltic country. Macroeconomic scenarios and their weights were most recently reconsidered in the fourth quarter of 2025 to reflect, mainly, possible consequences of the prevailing geopolitical uncertainties, distorted trade relations in the main markets in which Luminor operates, cybersecurity and climate change related issues. The ECL model inputs and parameters were updated, including changes in the estimated current and future states of the economy based on updated macroeconomic variables and forecasts, as well as regular IFRS 9 risk parameters used in ECL calculation.

At the end of 2025, the probability weights for scenarios remained unchanged compared to the end of 2024. The prevailing probability weights for the three scenarios are 20% for the optimistic scenario, 50% for the baseline, and 30% for the pessimistic scenario. The parameters used for macroeconomic modelling were:

Forecasts under different scenarios:

Economic data, %

		Scenarios											
		Optimistic					Baseline				Pessimistic		
31 December 2024	2023	24f	25f	26f	27f	24f	25f	26f	27f	24f	25f	26f	27f
Real GDP (a)													
Estonia	-2.7	-0.5	2.8	2.6	4.5	-1.0	1.0	1.0	3.0	-1.0	-7.0	-0.4	4.1
Latvia	-0.9	1.1	4.1	5.2	4.7	0.5	2.2	3.5	3.0	0.5	-5.8	-0.9	2.9
Lithuania	0.7	2.8	4.4	3.6	4.2	2.4	3.0	2.4	3.0	2.4	-5.0	-1.5	4.9
Unemployment rate													
Estonia	6.4	7.6	7.4	6.6	6.7	8.0	8.0	7.0	7.0	8.0	11.0	10.5	9.0
Latvia	6.5	6.8	6.3	5.6	6.6	7.1	6.8	6.0	7.0	7.1	10.8	12.0	10.6
Lithuania	6.9	7.1	6.5	6.4	6.4	7.5	7.2	7.0	7.0	7.5	11.2	12.7	11.4
Residential Real Estate price (a)													
Estonia	5.9	4.0	3.4	3.1	6.1	3.0	0.0	0.0	3.4	3.0	-20.0	-7.0	10.0
Latvia	3.7	3.2	6.6	7.3	7.2	2.0	1.7	2.7	2.9	2.0	-18.3	-2.9	10.0
Lithuania	9.8	4.7	3.5	3.3	5.3	4.0	1.0	1.0	3.0	4.0	-19.0	-9.4	6.0
HICP (a)													
Estonia	9.1	3.7	4.1	3.2	1.2	4.0	5.0	4.0	2.0	4.0	4.0	4.8	4.3
Latvia	9.1	0.9	1.0	1.2	1.1	1.2	2.1	2.2	2.0	1.2	1.1	1.6	3.0
Lithuania	8.7	0.4	1.4	2.4	1.4	0.6	2.2	3.0	2.0	0.6	1.2	-0.3	1.4
Wage growth (a)													
Estonia	11.4	7.3	7.0	6.9	5.9	7.0	6.0	6.0	5.0	7.0	0.5	3.1	7.3
Latvia	11.9	9.5	8.1	8.4	6.3	9.0	6.6	7.1	5.0	9.0	1.1	2.4	8.7
Lithuania	12.2	10.0	8.7	7.8	6.1	9.6	7.4	6.6	5.0	9.6	1.9	-0.5	4.8
31 December 2025	2024	25f	26f	27f	28f	25f	26f	27f	28f	25f	26f	27f	28f
Real GDP (a)													
Estonia	-0.1	1.0	3.8	4.7	4.7	1.0	2.0	3.0	3.0	1.0	-6.0	-8.1	3.7
Latvia	0.0	2.1	4.5	4.7	4.1	2.1	2.8	3.2	2.6	2.1	-5.4	-10.7	2.7
Lithuania	3.0	2.8	4.7	3.8	2.8	2.8	3.4	2.6	1.6	2.8	-5.4	-7.0	5.0
Unemployment rate													
Estonia	7.6	8.0	6.5	6.7	5.7	8.0	7.0	7.0	6.0	8.0	10.1	11.2	9.9
Latvia	6.9	6.6	5.6	5.2	5.1	6.6	6.1	5.7	5.5	6.6	10.0	12.9	11.6
Lithuania	7.1	6.4	6.4	6.3	6.5	6.4	7.0	6.8	7.0	6.4	10.4	12.3	11.1
Residential Real Estate price (a)													
Estonia	6.1	4.0	7.3	7.5	7.5	4.0	4.5	5.0	5.0	4.0	-20.0	-12.3	8.3
Latvia	4.2	5.0	8.9	9.8	8.8	5.0	5.8	7.0	6.0	5.0	-19.1	-15.0	3.5
Lithuania	9.7	8.0	10.5	9.3	5.2	8.0	8.0	7.0	3.0	8.0	-20.9	-7.8	7.2
HICP (a)													
Estonia	3.7	6.0	3.7	2.6	2.6	6.0	3.0	2.0	2.0	6.0	6.1	6.1	2.6
Latvia	1.3	3.9	3.6	3.1	2.8	3.9	2.7	2.4	2.1	3.9	4.7	5.7	2.8
Lithuania	0.9	3.8	4.8	3.8	2.6	3.8	4.0	3.2	2.0	3.8	4.7	4.8	3.1
Wage growth (a)													
Estonia	8.1	6.0	5.9	5.9	5.9	6.0	5.0	5.0	5.0	6.0	0.4	2.6	6.2
Latvia	9.7	7.9	8.8	8.1	7.1	7.9	7.5	7.0	6.0	7.9	1.0	3.1	6.3
Lithuania	10.4	8.5	9.7	8.0	5.5	8.5	8.5	7.0	4.5	8.5	1.0	3.3	5.5

a. Annual change

Material exposures are reviewed regularly. The regularity and depth of the assessment are based on the risk level and size of the exposure. The aim of the follow-up is to identify any potential worsening of the situation and start early actions to improve Luminor's position, and to identify the occurrence of unlikeliness to pay criteria. Credit-impaired large exposures that are above materiality thresholds are reviewed every quarter or more frequently when individual circumstances require. The valuation is updated when there are significant changes in cash flows; otherwise, it is performed at least once a year.

For Stage 3 financial asset exposures (including defaulted POCI assets), which are classified as material, Luminor evaluates the impairment amount on an individual basis (individual assessment) under the discounted cash flows method, where future cash flows from the customer's operations and cash flows from collateral realisation are considered. As a rule, two scenarios – base case and risk case – with certain probability weights are used. For exceptional cases, one scenario may be used, where only cash flow from collateral realisation without any cash flow from operating activities is considered, for example, a workout case.

For Stage 3 financial asset exposures (including defaulted POCI assets) that are classified as immaterial, Luminor evaluates the impairment amount on a collective basis (collective assessment) where collective assessment is defined by asset type, product, and non-performing loans vintage. Impairment is calculated by applying a provision rate for the unsecured part. The unsecured part for impairment purposes is calculated using the collateral value capped to the exposure amount and afterwards discounted, eliminating situations when over-collateralised loans have an entirely secured part and result in zero impairment. Different provision rates for the unsecured part are applied for three homogeneous groups: mortgage loans and other loans with real estate collateral to individuals; consumer and other loans (including leasing) to individuals; and loans to businesses.

Expected credit losses sensitivity analysis

ECL sensitivity analysis, €m

	31 Dec 2024		31 Dec 2025	
	Lower	Higher	Lower	Higher
Effect of change in SICR thresholds (a)				
Estonia	0.23	-0.11	0.25	-0.18
Latvia	0.47	-0.07	0.44	-0.30
Lithuania	0.67	-0.24	0.58	-0.13
Luminor	1.36	-0.42	1.27	-0.61
Effect of change in scenario probabilities (b)				
Estonia	-0.09	0.09	-0.14	0.14
Latvia	-0.22	0.22	-0.42	0.42
Lithuania	-0.58	0.59	-0.68	0.67
Luminor	-0.89	0.90	-1.24	1.23
Effect of change in LGD values of Stage 1 and 2 exposures (c)				
Estonia	-0.99	1.00	-1.03	1.04
Latvia	-2.32	2.34	-2.53	2.55
Lithuania	-3.26	3.29	-2.43	2.45
Luminor	-6.58	6.63	-5.99	6.04

In the above, increases in ECL (positive amounts) represent higher impairment allowances that would be recognised.

- Impact on ECL if SICR relative thresholds were increased or decreased by 20% and absolute thresholds increased or decreased by 20bps
- Impact on ECL if pessimistic scenario weight was increased or decreased by 2 p.p. and optimistic scenario weight was decreased or increased by 2 p.p.
- Impact on ECL if Loss given default values at exposure level increased or decreased relatively by 10%

Compared to 2024, the current state of the economy and its projections are more pessimistic for Latvia's legal entities, more positive for private individuals' segment in Lithuania, with other segments staying close to neutral. These observations then translate into the ECL sensitivity results observed in the table above.

Credit risk assessment on modified financial assets

In general, each time a financial instrument is modified due to financial problems of the debtor, a new rating/scoring is obtained, a new PD assigned, and the loan marked as forborne (restructured) if the regulatory reporting definition is met. Therefore, as a result of modification, the loan would be classified as Stage 2 if the forborne performing status is assigned (or Stage 3 if the forborne non-performing status is assigned) and/or the loan would be classified as Stage 2 if the change in PD is considered significant. In case of substantial modification resulting in derecognition of the asset and the origination of a new asset, the newly recognised asset is classified as Stage 1 if not credit-impaired or a POCI asset if credit-impaired.

Default definition

Luminor identifies a default when either a customer is past due more than 90 days on any material overdue amount to Luminor or the customer is considered unlikely to pay its credit obligations to Luminor, or both. For exposure to banks, the default is recognised when payments are overdue by more than 7 days. Counting of days past due on a customer level starts when the overdue amount on a customer level breaches the materiality threshold. For individual customers, the threshold is more than 100 EUR and more than 1% of their credit obligations to Luminor. For business customers, the threshold is more than 500 EUR and more than 1% of their credit obligations to Luminor. The default is recognised on a customer level.

Indications of unlikelihood to pay include:

- major financial problems of the customer (present or expected),
- distressed restructuring of credit obligation (forbearance triggering a non-performing status),
- recognition of specific credit risk adjustments resulting from a significant perceived decline in the credit quality of the exposure,
- Luminor sells the credit obligation at a material credit-related economic loss,
- bankruptcy of the customer or similar protection,
- non-accrued status,
- disappearance of an active market for a financial asset because of financial difficulties of the customer,
- credit fraud,
- external rating indicating default.

Return to non-defaulted status is possible no earlier than 3 months after all default triggers cease to be met. During those 3 months of the probation period, the customer must make payments due in a timely fashion. In a distressed restructuring, at least 1 year needs to pass since the moment of extending restructuring measures and the moment when a customer is deemed to have the ability to comply with the post-restructuring conditions before the obligation is considered non-defaulted.

Write-off policy

Luminor writes off financial assets, in whole or in part, which are considered as being non-collectible – in general following the sale of collateral. Before a write-off decision, Luminor ensures there is no reasonable expectation of recovery by assessing the legal recoverability of a claim and the possibility of voluntary recovery solutions based on a customer's willingness and ability to settle a claim. However, write-off does not limit Luminor's recovery measures. The outstanding contractual amount on financial assets that were written off during the year ended 31 December 2025 and are still subject to enforcement activity was 1.7 million EUR (31 December 2024: 7.9 million EUR).

Information about collaterals of loans

Luminor considers guarantees issued by the state and other parties issuing guarantees that are equivalent to the state guarantees. Guarantees and warranties issued by other parties (individuals, legal entities), although they mitigate risk, are considered immaterial. If exposure is secured by several different types of collateral, priority in recognition of a collateral is based on its liquidity. Securities, cash, and guarantees are treated as the types of collateral with the highest liquidity, followed by residential real estate and then other real estate. Movable assets like transport vehicles, equipment, and other assets are treated as having the lowest liquidity.

OPERATIONAL RISK

Operational risk is the risk of loss resulting from inadequate or failed internal processes, people, and systems, or from external events. Operational risk comprises nine sub-types in Luminor's risk taxonomy: Information and Communication Technology Risk (ICT), Information Security Risk, Data Management Risk, Legal Risk, Operational Continuity and Resilience Risk, People Risk, Process Risk, Third Party Risk and External Theft & Fraud Risk

Operational risk management is governed by the Operational Risk Management Standard and other relevant operational risk management framework documents, which establish requirements for identifying, managing, assessing, treating, monitoring, and reporting operational risks. Business units are responsible for operational risk management within their areas and are overseen by the Operational Risk Department, which identifies any deviations from Luminor's Risk Appetite Framework and ensures any deviations can be managed effectively without significant detriment to Luminor, its customers or other stakeholders. Luminor Management is kept updated on the status of operational risk through periodic and ad hoc risk reporting.

MARKET RISK

Market risk is the risk of losses in on- and off-balance sheet positions arising from adverse movements in market prices. The most significant parts of market risk for Luminor are interest rate risk and credit spread risk in the banking book. Luminor has a low-risk appetite for market risk. Customer related derivative business, which commonly includes foreign exchange, interest rates and commodities, is hedged through interbank transactions.

Luminor monitors and manages all risks within banking and trading book. Market value at risk and other risk measurements and metrics are part of the management, limit, and control system. Luminor's trading book is very small and consists mainly of low-risk fixed income instruments to provide secondary market liquidity. The inherent risks, mainly interest rate sensitivity and credit spread risk, are small. Interest rate risk in the banking book is also measured in terms of stressed EVE (Economic Value of Equity) and stressed NII (Net Interest Income) to ensure compliance with regulatory guidance. Credit spread risk is relatively small due to predominantly low-risk fixed income instruments in the banking book. Year on year changes in stressed NII and EVE were driven by benign changes in Luminor's balance sheet structure and deposit hedging activities.

Sensitivity to interest rate risk in banking book, €m	2024	2025
Stressed Net interest income (Parallel up +200bp)	42.8	28.3
Stressed Economic value of equity (Parallel up +200bp)	69.4	-10.5
Stressed Net interest income (Parallel down -200bp) (a)	-43.0	-28.1
Stressed Economic value of equity (Parallel down -200bp) (a)	-71.5	11.6

a. Negative interest rate scenarios floored at -1.5% based on the EBA guidelines.

Luminor operates mainly in euros. Positions in other currencies are small. FX risk is measured as the nominal value of open FX positions converted to Euro using the ECB rates. Luminor has defined limits for all foreign currencies.

Exposure to FX risk, €m	2024	2025
US Dollars	-0.4	-0.2
Maximum absolute exposure of all foreign currencies other than US Dollars	0.1	0.1
Sum of all foreign currency exposures in absolute terms excluding US Dollars	0.3	0.4
Total (a)	0.7	0.6

a. The higher absolute value of either sum of positive exposures or sum of negative exposures of all foreign currency open positions.

LIQUIDITY RISK

Liquidity risk is the risk of the bank being unable to fulfil its obligations in a timely manner or to the full extent when they fall due, without incurring significant costs in the process. Liquidity is managed to ensure a constant ability to fulfil contractual obligations. Liquidity risk management is divided into intraday, short-term, and long-term liquidity management. Liquidity risk management considers Luminor's business strategy and financial plan and is based on the funding strategy and funding plan. Luminor continuously analyses cash flows, development of funding sources and markets and associated trends to ensure proactive management of liquidity and liquidity risks.

Luminor uses a range of liquidity metrics for measuring, monitoring, and controlling liquidity risk, including the Liquidity Coverage Ratio (LCR), the Net Stable Funding Ratio (NSFR), internal liquidity metrics to comprehensively cover liquidity risks, including funding concentrations and the survival period for liquidity requirements under potential stress. Additionally, Luminor has a broad set of early warning indicators to identify adverse liquidity trends in a timely fashion, and contingency funding plans to manage Luminor's liquidity during liquidity disruptions. The liquidity risk management strategy is reviewed at least annually or after any significant change in the internal or external environment.

Whilst the regulatory minimum limit for LCR and NSFR ratios is set at 100%, Luminor internal limits are set well above those requirements while maintaining a substantial liquidity buffer over and above regulatory requirements.

COUNTRY RISK

Country risk is a risk that some event within a country could have an adverse effect on Luminor directly by impairing the value of Luminor or indirectly through an obligor's ability to meet its obligations to Luminor. Establishment of country limits is required when Luminor acquires sovereign debt, takes risk backed by a country's government, or when establishing credit limits towards foreign financial institutions. No country limits are required for exposures to countries that are rated at AA- (S&P, Fitch), or Aa3 (Moody's), or better; EU countries that are rated BBB (S&P, Fitch), or Baa2 (Moody's), or better; and Luminor's home markets of Estonia, Latvia, and Lithuania. At the end of the reporting period Luminor had set country limits of 40 million EUR towards three countries out of which 2.8 million EUR were utilised.

COMPLIANCE RISK

Compliance risk is the risk of negative impacts due to potential regulatory criticism, direct or indirect financial liabilities, civil penalties, or loss to reputational standing due to non-compliance or as a result of failure to comply with laws, regulations, organizational standards of practice, or other applicable rules. Compliance risk entails financial crime risk, conduct risk and regulatory compliance risk. Compliance risk management is based on a strong compliance culture, where all stakeholders feel empowered and accountable to take active steps to ensure that Luminor remains compliant.

BUSINESS MODEL RISK

Business model risk is the risk of not fulfilling strategic and financial planning objectives due to external business risks and internal strategic risks. Business model risk is managed through the strategic and financial planning processes, through product management and an adequate product pricing framework, through establishing performance criteria to incentivize the execution of the strategy and through performance management to continually monitor and steer performance.

MODEL RISK

Model risk is the risk of adverse effects on capital adequacy, financial loss, poor business, or strategic decision-making from the use of inadequate or deficient quantitative models. Periodical validation and proactive model risk management of Luminor's models is performed according to principles established in internal regulations.

CAPITAL MANAGEMENT

Capital is managed to comply with minimum capital, regulatory buffer and liquidity requirements at all times. The capital requirements are the sum of requirements of minimum capital, Other Systemically Important Institution (O-SII), Pillar 2, and Systemic Risk Buffer and Countercyclical Risk Buffers set by the supervisory authorities in the Baltic countries.

Luminor uses the Standardised method in its Capital Adequacy calculations to calculate the Risk Exposure Amount (REA) for Credit and Market risk. The REA for operational risk is calculated using the Standardised Measurement Approach method. Based on information provided internally to key management personnel Luminor complied with external capital requirements during the current and preceding reporting periods.

Capital requirements and resources	31 Dec 2024	31 Dec 2025
Capital requirements, % REAs		
Common Equity Tier 1	11.63	11.63
Tier 1	13.60	13.60
Total capital	16.23	16.23
Capital resources, €m		
Capital, as reported ('Management view', which includes profit for the year to be retained)		
Common Equity Tier 1	1,523.0	1,597.6
Tier 1	1,523.0	1,745.3
Total capital	1,722.1	1,944.8
Capital, regulatory basis		
Common Equity Tier 1	1,477.8	1,513.9
Tier 1	1,477.8	1,661.6
Total capital	1,676.9	1,861.1

Exact capital requirements are rounded to 2 decimal places at each calculation level.

3. Net interest and similar income

€m	2024	2025
Balances with central banks	113.0	50.0
Balances with banks	0.6	0.3
Debt securities at amortised cost	29.5	46.0
Loans to customers at amortised cost	566.3	446.0
Interest income calculated using effective interest method	709.4	542.3
Finance leases	90.2	70.8
Other	2.2	0.8
Other similar income	92.4	71.6
Interest and similar income	801.8	613.9
Loans and deposits from credit institutions	-7.1	-4.1
Deposits from customers	-171.5	-107.5
Debt securities issued	-59.4	-70.1
Loss on hedging activities	-45.5	-4.4
Contributions to deposit guarantee fund	-9.9	-7.5
Other	-0.7	-0.5
Interest expense	-294.1	-194.1
Total	507.7	419.8

4. Net fee and commission income

€m	2024			2025		
	Income	Expense	Net	Income	Expense	Net
Cards	45.0	-22.5	22.5	45.4	-23.8	21.6
Credit products	5.5	-1.7	3.8	5.1	-1.5	3.6
Daily banking plans	19.8	-	19.8	20.8	-	20.8
Deposit products and cash management	13.7	-3.2	10.5	12.8	-3.2	9.6
Insurance	4.1	-	4.1	4.4	-	4.4
Investments	4.9	-1.8	3.1	6.0	-2.3	3.7
Pensions	15.5	-1.8	13.7	13.4	-3.2	10.2
Trade finance	10.9	0.0	10.9	9.9	0.0	9.9
Other	1.2	0.0	1.2	1.6	0.0	1.6
Total	120.6	-31.0	89.6	119.4	-34.0	85.4

Fee and commission income by recognition type

€m	2024			2025		
	Over time	Point in time	Total	Over time	Point in time	Total
Cards	2.3	42.7	45.0	3.0	42.4	45.4
Credit products	1.3	4.2	5.5	1.1	4.0	5.1
Daily banking plans	19.8	-	19.8	20.8	-	20.8
Deposit products and cash management	3.2	10.5	13.7	3.0	9.8	12.8
Insurance	-	4.1	4.1	-	4.4	4.4
Investments	3.1	1.8	4.9	3.7	2.3	6.0
Pensions	15.5	-	15.5	13.4	-	13.4
Trade finance	10.4	0.5	10.9	9.3	0.6	9.9
Other	0.0	1.2	1.2	0.0	1.6	1.6
Total	55.6	65.0	120.6	54.3	65.1	119.4

5. Net gain from financial items

€m	2024	2025
Derivatives	23.5	-10.4
Financial assets and liabilities held for trading (a)	14.3	9.9
Financial assets and liabilities at fair value through profit or loss	1.6	0.9
Investments in Debt securities designated at fair value through profit or loss	6.6	2.7
Total Net gain from financial instruments at fair value	46.0	3.1
Investments in Debt securities at amortised cost	0.2	3.7
Net gain (-loss) from foreign currency exchange differences	-13.4	22.4
Total	32.8	29.2
a. of which FX spot	13.4	9.1

6. Personnel expenses

€m	2024	2025
Wages and salaries	-121.6	-125.2
Social security contributions	-19.6	-22.2
Indirect personnel expenses (recruitment, training)	-5.7	-5.6
Contribution to pension funds	-0.5	-0.6
Total	-147.4	-153.6

Social security tax payments include a contribution to state pension funds. Luminor has no legal or constructive obligation to make pension or similar payments beyond the social security tax.

7. Other administration expenses

€m	2024	2025
Information Technology	-114.3	-113.0
Consulting and professional services	-15.9	-7.3
Advertising and marketing	-8.2	-10.1
Real estate	-3.1	-3.1
Taxes and duties	2.1	-5.2
Other	-35.6	-27.5
Total	-175.0	-166.2
of which PwC:		
Audit of these consolidated financial statements	0.3	0.5
Other services including audit of subsidiaries financial statements	0.5	0.8

In addition to the statutory audit, PwC provided additional services required by regulations in the Baltic countries and other services permitted under the Estonian Auditors Activities Act and other EU and national laws and regulations.

8. Bank taxes

€m	2024	2025
Latvian bank tax	-27.7	-
Lithuanian bank tax	-5.7	0.0
Total	-33.4	0.0

9. Cash and balances with central banks

€m	31 Dec 2024	31 Dec 2025
Cash on hand	120.4	120.0
Balances with central banks	2,985.9	1,817.6
Total	3,106.3	1,937.6

10. Debt securities

By type of obligor and IFRS9 measurement

€m	Govern- ments	Credit institutions	Financial institutions	Corporates	Total
31 December 2024					
AC	1,236.3	165.3	4.9	104.6	1,511.1
FVTPLD	115.8	16.9	-	-	132.7
FVTPLM	18.9	0.0	3.2	1.4	23.5
FVTOCI	2.9	-	-	-	2.9
Total	1,373.9	182.2	8.1	106.0	1,670.2
of which pledged as security for covered bonds	82.0	19.8	-	-	101.8
31 December 2025					
AC	1,600.0	337.5	5.0	49.5	1,992.0
FVTPLD	83.9	-	-	-	83.9
FVTPLM	9.9	2.2	1.4	1.4	14.9
FVTOCI	1.5	-	-	-	1.5
Total	1,695.3	339.7	6.4	50.9	2,092.3
of which pledged as security for covered bonds	66.8	34.8	-	-	101.6

All the portfolio is classified as Stage 1 and total ECLs recognised as at the end of 2025 amounted to 0.9 million EUR (2024: 1.0 million EUR).

Luminor buys derivatives (interest rate swaps) to economically hedge the interest rate risk of debt securities affecting fair value. Derivatives are accounted for in the trading portfolio with the fair value changes through profit or loss. To avoid or significantly reduce accounting mismatch, part of the debt securities portfolio are designated at FVTPL. For the debt securities designated at FVTPL, the maximum credit risk equals their carrying amount. Part of the change in fair value that is attributable to credit risk component is immaterial. The credit risk level of these securities is low (all rated AAA to A by Fitch and/or Standard & Poor's).

11. Loans to customers

€m	31 Dec 2024	31 Dec 2025
Individuals	6,112.2	6,701.3
Businesses	4,023.5	4,287.8
Financial institutions	191.7	212.3
Public sector	208.0	290.0
Total	10,535.4	11,491.4
of which loans pledged as security for covered bonds (see also Note 17, 'Debt securities issued', below)	963.2	948.4
By country of customer registration		
Estonia, Latvia, and Lithuania	10,398.8	11,289.3
Rest of the European Union	112.4	171.1
Other	24.2	31.0
Total	10,535.4	11,491.4

Loans to customers by stage and type

€m	Gross carrying amount				Credit loss allowances				Total
	Stage 1	2	3	Total	Stage 1	2	3	Total	
31 December 2024									
Mortgages	5,108.2	161.4	49.0	5,318.6	-4.0	-12.1	-9.5	-25.6	5,293.0
Leasing	400.5	23.7	3.7	427.9	-1.6	-1.4	-1.3	-4.3	423.6
Consumer loans, cards	125.4	7.5	1.0	133.9	-0.7	-0.8	-0.5	-2.0	131.9
Other	235.9	25.0	7.0	267.9	-0.7	-1.2	-2.3	-4.2	263.7
Individuals	5,870.0	217.6	60.7	6,148.3	-7.0	-15.5	-13.6	-36.1	6,112.2
Loans	2,297.0	572.9	102.9	2,972.8	-8.7	-12.7	-30.3	-51.7	2,921.1
Leasing	789.2	105.0	23.6	917.8	-3.5	-4.6	-8.2	-16.3	901.5
Factoring	194.6	6.7	0.1	201.4	-0.4	0.0	-0.1	-0.5	200.9
Businesses	3,280.8	684.6	126.6	4,092.0	-12.6	-17.3	-38.6	-68.5	4,023.5
Financial institutions	167.6	25.0	0.0	192.6	-0.3	-0.6	0.0	-0.9	191.7
Public sector	208.1	0.0	-	208.1	-0.1	0.0	-	-0.1	208.0
Total	9,526.5	927.2	187.3	10,641.0	-20.0	-33.4	-52.2	-105.6	10,535.4
31 December 2025									
Mortgages	5,550.4	186.2	63.1	5,799.7	-4.1	-7.3	-8.4	-19.8	5,779.9
Leasing	421.8	24.3	4.2	450.3	-1.5	-1.4	-1.3	-4.2	446.1
Consumer loans, cards	144.9	7.2	1.2	153.3	-0.8	-0.5	-0.6	-1.9	151.4
Other	296.7	23.7	7.0	327.4	-0.9	-0.8	-1.8	-3.5	323.9
Individuals	6,413.8	241.4	75.5	6,730.7	-7.3	-10.0	-12.1	-29.4	6,701.3
Loans	2,717.7	334.6	131.1	3,183.4	-9.9	-5.7	-42.9	-58.5	3,124.9
Leasing	842.5	118.6	24.9	986.0	-4.5	-3.7	-8.2	-16.4	969.6
Factoring	182.9	10.8	0.4	194.1	-0.5	-0.1	-0.2	-0.8	193.3
Businesses	3,743.1	464.0	156.4	4,363.5	-14.9	-9.5	-51.3	-75.7	4,287.8
Financial institutions	189.4	23.5	-	212.9	-0.3	-0.3	-	-0.6	212.3
Public sector	290.1	0.1	-	290.2	-0.2	-	-	-0.2	290.0
Total	10,636.4	729.0	231.9	11,597.3	-22.7	-19.8	-63.4	-105.9	11,491.4

Loans to customers, Businesses, by stage and sector

€m	Gross carrying amount				Credit loss allowances				Total
	Stage 1	2	3	Total	Stage 1	2	3	Total	
31 December 2024									
Real estate activities	1,009.5	191.3	5.7	1,206.5	-2.9	-2.3	-1.3	-6.5	1,200.0
Wholesale and retail	422.3	113.7	9.2	545.2	-1.5	-2.4	-5.4	-9.3	535.9
Manufacturing	421.0	115.1	9.4	545.5	-1.4	-3.0	-5.0	-9.4	536.1
Administrative & support services	250.9	42.6	7.5	301.0	-1.3	-1.2	-1.7	-4.2	296.8
Agriculture, forestry, fishing	259.8	64.3	11.2	335.3	-1.0	-3.6	-3.6	-8.2	327.1
Electricity, gas, steam, aircon	226.5	9.9	0.1	236.5	-1.5	-0.1	-0.1	-1.7	234.8
Transport & storage	172.3	24.2	8.5	205.0	-0.7	-1.4	-3.1	-5.2	199.8
Construction	189.6	41.7	2.9	234.2	-0.8	-2.3	-1.2	-4.3	229.9
Professional, scientific, technical	98.7	50.0	0.8	149.5	-0.5	-0.6	-0.3	-1.4	148.1
Other	230.2	31.8	71.3	333.3	-1.0	-0.4	-16.9	-18.3	315.0
Total	3,280.8	684.6	126.6	4,092.0	-12.6	-17.3	-38.6	-68.5	4,023.5
31 December 2025									
Real estate activities	1,180.5	69.4	2.4	1,252.3	-3.8	-0.6	-0.6	-5.0	1,247.3
Wholesale and retail	502.0	63.4	24.4	589.8	-2.0	-0.8	-10.2	-13.0	576.8
Manufacturing	417.4	119.1	28.6	565.1	-1.4	-1.9	-12.0	-15.3	549.8
Administrative & support services	324.0	41.2	7.3	372.5	-2.1	-0.9	-1.9	-4.9	367.6
Agriculture, forestry, and fishing	249.3	90.2	15.4	354.9	-1.4	-2.8	-4.3	-8.5	346.4
Electricity, gas, steam, & aircon	313.8	10.7	0.0	324.5	-1.1	-0.2	0.0	-1.3	323.2
Transport and storage	212.1	22.4	5.3	239.8	-1.0	-1.2	-2.1	-4.3	235.5
Construction	174.9	15.1	3.0	193.0	-0.9	-0.5	-1.2	-2.6	190.4
Professional, scientific, technical	158.3	11.2	0.9	170.4	-0.5	-0.1	-0.3	-0.9	169.5
Other	210.8	21.3	69.1	301.2	-0.7	-0.5	-18.7	-19.9	281.3
Total	3,743.1	464.0	156.4	4,363.5	-14.9	-9.5	-51.3	-75.7	4,287.8

Investments in finance leases

€m	Year 1	Year 2	Year 3	Year 4	Year 5	> 5 years	Total
31 December 2024							
Gross investments	470.5	400.9	293.0	188.7	122.4	19.0	1,494.5
Unearned future finance income	-51.8	-39.2	-23.1	-11.4	-4.3	-0.8	-130.6
Total	418.7	361.7	269.9	177.3	118.1	18.2	1,363.9
31 December 2025							
Gross investments	484.1	414.0	289.9	217.5	142.0	24.1	1,571.6
Unearned future finance income	-45.1	-35.4	-21.2	-11.6	-4.5	-1.0	-118.8
Total	439.0	378.6	268.7	205.9	137.5	23.1	1,452.8

Expected credit losses

€m	2024	2025
Loans to customers	-1.0	-0.6
Contingent liabilities	2.3	2.5
Total	1.3	1.9

Stage 3 Loans to customers by type of customer and collateral value

€m	31 Dec 2024			31 Dec 2025		
	Individuals	Businesses	Total	Individuals	Businesses	Total
Under collateralised loans	5.0	46.0	51.0	4.1	40.9	45.0
Over collateralised loans	55.7	80.6	136.3	71.4	115.5	186.9
Gross carrying amount	60.7	126.6	187.3	75.5	156.4	231.9
Credit loss allowances	-13.6	-38.6	-52.2	-12.1	-51.3	-63.4
Total	47.1	88.0	135.1	63.4	105.1	168.5
of which POCI	4.9	-	4.9	4.7	-	4.7
Collateral fair value						
Under collateralised loans	3.8	25.4	29.2	3.1	26.7	29.8
Over collateralised loans	54.1	77.9	132.0	69.8	112.6	182.4
Total	57.9	103.3	161.2	72.9	139.3	212.2
of which POCI	5.3	-	5.3	4.9	-	4.9

Loans to customers by stage, type, and risk category
(continues on next page)

€m	31 Dec 2024				31 Dec 2025			
	Stage 1	2	3	Total	Stage 1	2	3	Total
Individuals								
Mortgages								
Low risk	4,532.8	8.2	-	4,541.0	4,066.8	4.1	-	4,070.9
Moderate risk	524.1	14.5	-	538.6	1,326.9	10.4	-	1,337.3
High risk	51.3	138.7	-	190.0	156.7	171.7	-	328.4
Default	-	-	49.0	49.0	-	-	63.1	63.1
Gross carrying amount	5,108.2	161.4	49.0	5,318.6	5,550.4	186.2	63.1	5,799.7
Leasing								
Low risk	197.9	0.1	-	198.0	131.1	0.3	-	131.4
Moderate risk	184.2	9.6	-	193.8	270.6	5.9	-	276.5
High risk	18.4	14.0	-	32.4	20.1	18.1	-	38.2
Default	-	-	3.7	3.7	-	-	4.2	4.2
Gross carrying amount	400.5	23.7	3.7	427.9	421.8	24.3	4.2	450.3
Consumer loans, cards								
Low risk	73.5	0.1	-	73.6	46.6	0.1	-	46.7
Moderate risk	48.6	2.5	-	51.1	90.7	1.3	-	92.0
High risk	3.3	4.9	-	8.2	7.6	5.8	-	13.4
Default	-	-	1.0	1.0	-	-	1.2	1.2
Gross carrying amount	125.4	7.5	1.0	133.9	144.9	7.2	1.2	153.3
Other								
Low risk	125.5	0.3	-	125.8	127.1	0.3	-	127.4
Moderate risk	107.2	7.2	-	114.4	160.7	6.8	-	167.5
High risk	3.2	17.5	-	20.7	8.9	16.6	-	25.5
Default	0.0	-	7.0	7.0	-	-	7.0	7.0
Gross carrying amount	235.9	25.0	7.0	267.9	296.7	23.7	7.0	327.4

Loans to customers by stage, type, and risk category
(continued from prior page)

€m	31 Dec 2024				31 Dec 2025			
	Stage 1	2	3	Total	Stage 1	2	3	Total
Businesses								
Loans								
Low risk	779.3	4.7	-	784.0	1,139.2	1.9	-	1,141.1
Moderate risk	1,512.4	410.9	-	1,923.3	1,566.7	218.1	-	1,784.8
High risk	5.3	157.3	-	162.6	11.8	114.6	-	126.4
Default	-	-	102.9	102.9	-	-	131.1	131.1
Gross carrying amount	2,297.0	572.9	102.9	2,972.8	2,717.7	334.6	131.1	3,183.4
Leasing								
Low risk	184.3	0.5	-	184.8	162.6	1.2	-	163.8
Moderate risk	588.0	41.6	-	629.6	654.3	63.6	-	717.9
High risk	16.9	62.9	-	79.8	25.6	53.8	-	79.4
Default	-	-	23.6	23.6	-	-	24.9	24.9
Gross carrying amount	789.2	105.0	23.6	917.8	842.5	118.6	24.9	986.0
Factoring								
Low risk	94.0	0.2	-	94.2	119.3	-	-	119.3
Moderate risk	100.5	1.5	-	102.0	63.0	8.6	-	71.6
High risk	0.1	5.0	-	5.1	0.6	2.2	-	2.8
Default	-	-	0.1	0.1	-	-	0.4	0.4
Gross carrying amount	194.6	6.7	0.1	201.4	182.9	10.8	0.4	194.1
Financial institutions								
Low risk	150.2	-	-	150.2	169.1	0.0	-	169.1
Moderate risk	17.4	24.8	-	42.2	20.3	23.4	-	43.7
High risk	0.0	0.2	-	0.2	0.0	0.1	-	0.1
Default	-	-	0.0	0.0	-	-	0.0	0.0
Gross carrying amount	167.6	25.0	0.0	192.6	189.4	23.5	0.0	212.9
Public sector								
Low risk	208.1	0.0	-	208.1	289.9	0.1	-	290.0
Moderate risk	-	-	-	-	0.2	-	-	0.2
High risk	-	-	-	-	-	-	-	-
Default	-	-	-	-	-	-	-	-
Gross carrying amount	208.1	0.0	-	208.1	290.1	0.1	-	290.2
Total								
Low risk	6,345.6	14.1	-	6,359.7	6,251.7	8.0	-	6,259.7
Moderate risk	3,082.4	512.6	-	3,595.0	4,153.4	338.1	-	4,491.5
High risk	98.5	400.5	-	499.0	231.3	382.9	-	614.2
Default	-	-	187.3	187.3	-	-	231.9	231.9
Gross carrying amount	9,526.5	927.2	187.3	10,641.0	10,636.4	729.0	231.9	11,597.3
of which POCI	-	4.1	1.0	5.1	-	3.8	0.9	4.7

Movement in Loans to customers and credit loss allowances

For the purposes of the movement schedules below, Luminor assesses Stages only at the reporting date and transfers between the Stages reflect this. Movements between stages are measured at the beginning of the reporting period.

Movement by stage in Loans to customers and credit loss allowances

€m	2024				2025			
	Stage 1	2	3	Total	Stage 1	2	3	Total
Gross carrying amount								
Opening balance	8,896.1	1,526.6	202.2	10,624.9	9,526.5	927.2	187.3	10,641.0
Transfers to Stage 1	527.4	-526.0	-1.4	0.0	248.9	-248.1	-0.8	0.0
Transfers to Stage 2	-392.1	418.1	-26.0	0.0	-434.1	448.7	-14.6	0.0
Transfers to Stage 3	-29.8	-65.7	95.5	0.0	-45.9	-67.8	113.7	0.0
Originated	2,082.1	-	-	2,082.1	3,044.2	-	-	3,044.2
Derecognised and repaid	-1,557.2	-425.8	-65.7	-2,048.7	-1,703.2	-331.0	-53.4	-2,087.6
Movement	630.4	-599.4	2.4	33.4	1,109.9	-198.2	44.9	956.6
Write-offs, recoveries etc.	-	-	-17.3	-17.3	-	-	-0.3	-0.3
Closing balance	9,526.5	927.2	187.3	10,641.0	10,636.4	729.0	231.9	11,597.3
of which POCI	-	4.1	1.0	5.1	-	3.8	0.9	4.7
Credit loss allowances								
Opening balance	-24.6	-42.0	-55.5	-122.1	-20.0	-33.4	-52.2	-105.6
Transfers to Stage 1	-10.7	10.5	0.2	0.0	-6.9	6.7	0.2	0.0
Transfers to Stage 2	4.7	-9.9	5.2	0.0	2.9	-5.8	2.9	0.0
Transfers to Stage 3	2.8	5.9	-8.7	0.0	8.1	6.4	-14.5	0.0
Originated	-12.4	-	-	-12.4	-18.2	-	-	-18.2
Derecognised and repaid	0.6	0.9	0.8	2.3	2.9	4.5	2.9	10.3
Change in ECL assumptions, Stages & other	19.6	1.2	-11.5	9.3	8.5	1.8	-3.0	7.3
Movement	4.6	8.6	-14.0	-0.8	-2.7	13.6	-11.5	-0.6
Write-offs, recoveries etc.	-	-	17.3	17.3	-	-	0.3	0.3
Closing balance	-20.0	-33.4	-52.2	-105.6	-22.7	-19.8	-63.4	-105.9
of which POCI	-	-0.1	-0.2	-0.3	-	-0.0	-0.1	-0.1

Movement by stage in Loans to customers, Individuals, Mortgages and credit loss allowances

€m	2024				2025			
	Stage 1	2	3	Total	Stage 1	2	3	Total
Gross carrying amount								
Opening balance	4,903.0	197.4	63.8	5,164.2	5,108.2	161.4	49.0	5,318.6
Transfers to Stage 1	87.0	-86.4	-0.6	0.0	44.3	-44.3	0.0	0.0
Transfers to Stage 2	-70.1	89.9	-19.8	0.0	-102.3	113.8	-11.5	0.0
Transfers to Stage 3	-4.4	-14.0	18.4	0.0	-15.3	-21.9	37.2	0.0
Originated	712.6	-	-	712.6	1,098.4	0.0	0.0	1,098.4
Derecognised and repaid	-519.9	-25.5	-10.8	-556.2	-582.9	-22.8	-12.0	-617.7
Movement	205.2	-36.0	-12.8	156.4	442.2	24.8	13.7	480.7
Write-offs, recoveries etc.	-	-	-2.0	-2.0	-	-	0.4	0.4
Closing balance	5,108.2	161.4	49.0	5,318.6	5,550.4	186.2	63.1	5,799.7
of which POCI	-	3.5	0.8	4.3	-	3.8	0.9	4.7
Credit loss allowances								
Opening balance	-11.6	-15.0	-14.3	-40.9	-4.0	-12.1	-9.5	-25.6
Transfers to Stage 1	-5.5	5.5	0.0	0.0	-3.2	3.2	0.0	0.0
Transfers to Stage 2	0.5	-4.5	4.0	0.0	0.4	-2.2	1.8	0.0
Transfers to Stage 3	0.2	1.7	-1.9	0.0	0.1	2.2	-2.3	0.0
Originated	-1.0	-	-	-1.0	-1.3	0.0	0.0	-1.3
Derecognised and repaid	0.3	0.9	1.2	2.4	0.3	0.7	1.1	2.1
Change in ECL assumptions, Stages & other	13.1	-0.7	-0.5	11.9	3.6	0.9	0.9	5.4
Movement	7.6	2.9	2.8	13.3	-0.1	4.8	1.5	6.2
Write-offs, recoveries etc.	-	-	2.0	2.0	-	-	-0.4	-0.4
Closing balance	-4.0	-12.1	-9.5	-25.6	-4.1	-7.3	-8.4	-19.8
of which POCI	-	-	-0.2	-0.2	-	-	-0.1	-0.1

Movement by stage in Loans to customers, Businesses, Loans and credit loss allowances
€m

	2024				2025			
	Stage 1	2	3	Total	Stage 1	2	3	Total
Gross carrying amount								
Opening balance	1,918.4	1,043.3	99.4	3,061.1	2,297.0	572.9	102.9	2,972.8
Transfers to Stage 1	354.3	-354.3	0.0	0.0	165.8	-165.7	-0.1	0.0
Transfers to Stage 2	-192.5	195.1	-2.6	0.0	-166.2	166.3	-0.1	0.0
Transfers to Stage 3	-7.1	-41.6	48.7	0.0	-13.8	-34.6	48.4	0.0
Originated	619.7	0.0	0.0	619.7	880.4	0.0	0.0	880.4
Derecognised and repaid	-395.8	-269.6	-27.8	-693.2	-445.5	-204.3	-20.4	-670.2
Movement	378.6	-470.4	18.3	-73.5	420.7	-238.3	27.8	210.2
Write-offs, recoveries etc.	-	-	-14.8	-14.8	-	-	0.5	0.5
Closing balance	2,297.0	572.9	102.9	2,972.8	2,717.7	334.6	131.2	3,183.5
of which POCI	-	-	-	-	-	-	-	-
Credit loss allowances								
Opening balance	-5.7	-19.0	-28.4	-53.1	-8.7	-12.7	-30.3	-51.7
Transfers to Stage 1	-3.1	3.1	0.0	0.0	-2.1	2.1	0.0	0.0
Transfers to Stage 2	2.6	-2.9	0.3	0.0	1.1	-1.2	0.1	0.0
Transfers to Stage 3	0.5	3.3	-3.8	0.0	5.5	3.2	-8.7	0.0
Originated	-5.7	-	-	-5.7	-9.8	0.0	0.0	-9.8
Derecognised and repaid	0.9	3.4	1.0	5.3	1.4	1.7	0.5	3.6
Change in ECL assumptions, Stages & other	1.8	-0.6	-14.2	-13.0	2.7	1.2	-4.0	-0.1
Movement	-3.0	6.3	-16.7	-13.4	-1.2	7.0	-12.1	-6.3
Write-offs, recoveries etc.	-	-	14.8	14.8	0.0	0.0	-0.5	-0.5
Closing balance	-8.7	-12.7	-30.3	-51.7	-9.9	-5.7	-42.9	-58.5
of which POCI	-	-	-	-	-	-	-	-

Loans to customers by collateral and type

€m	Unsecured	Secured			Total	
		Residential Real estate	Other Real estate	Other security		
31 December 2024						
Mortgages	23.6	5,267.4	25.4	2.2	5,295.0	5,318.6
Leasing	30.1	-	-	397.8	397.8	427.9
Consumer loans, cards	127.3	0.6	0.0	6.0	6.6	133.9
Other	11.8	146.7	74.4	35.0	256.1	267.9
Individuals	192.8	5,414.7	99.8	441.0	5,955.5	6,148.3
Loans	309.3	77.7	1,920.6	665.2	2,663.5	2,972.8
Leasing	134.3	-	-	783.5	783.5	917.8
Factoring	201.4	-	-	-	-	201.4
Businesses	645.0	77.7	1,920.6	1,448.7	3,447.0	4,092.0
Financial institutions	0.6	0.1	179.9	12.0	192.0	192.6
Public sector	159.2	-	9.3	39.6	48.9	208.1
Total	997.6	5,492.5	2,209.6	1,941.3	9,643.4	10,641.0
31 December 2025						
Mortgages	33.2	5,734.5	28.7	3.3	5,766.5	5,799.7
Leasing	20.9	-	-	429.4	429.4	450.3
Consumer loans, cards	147.7	0.8	0.0	4.8	5.6	153.3
Other	18.1	167.6	77.6	64.1	309.3	327.4
Individuals	219.9	5,902.9	106.3	501.6	6,510.8	6,730.7
Loans	345.5	84.7	2,109.7	643.5	2,837.9	3,183.4
Leasing	97.5	-	-	888.5	888.5	986.0
Factoring	194.1	-	-	-	-	194.1
Businesses	637.1	84.7	2,109.7	1,532.0	3,726.4	4,363.5
Financial institutions	0.4	2.5	205.3	4.7	212.5	212.9
Public sector	247.7	-	5.0	37.5	42.5	290.2
Total	1,105.1	5,990.1	2,426.3	2,075.8	10,492.2	11,597.3

12. Investments in associates and subsidiaries

Investments in associates, €m	2024	2025
Opening balance	5.5	5.9
Profit for the year (a)	1.2	1.3
Dividends	-1.3	-1.1
Other	0.5	-
Closing balance	5.9	6.1

Associates, €m	Domicile	Share of capital (%)	31 Dec 2024			31 Dec 2025		
			Equity	Profit for the year (a)	Book value	Equity	Profit for the year (a)	Book value
ALD Automotive Eesti AS	Estonia	25.0	5.9	0.2	2.1	6.0	0.2	2.1
ALD Automotive SIA	Latvia	25.0	8.9	0.4	1.5	8.9	0.4	1.7
ALD Automotive UAB	Lithuania	25.0	8.7	0.5	2.2	9.0	0.7	2.3
SIA Kredītinformācijas Birojs (b)	Latvia	19.9	1.5	0.1	0.1	-	-	-
Total				1.2	5.9		1.3	6.1

a. Luminor share of the associates profit

b. Investment in this associate was sold in 2025 for a consideration of 0.9 million EUR, which realised a gain on sale of 0.8 million EUR. Share of capital at 31 December 2025 was 0%.

Subsidiary	Activity	Domicile	31 Dec 2024	31 Dec 2025
Luminor Liising AS	Leasing, factoring	Estonia	100%	100%
Luminor Līzings SIA	Leasing, factoring	Latvia	100%	100%
Luminor Lizingas UAB	Leasing, factoring	Lithuania	100%	100%
Luminor Pensions Estonia AS	Pension fund management	Estonia	100%	100%
Luminor Latvijas atklātais pensiju fonds AS	Pension fund management	Latvia	100%	100%
Luminor Asset Management IPAS	Pension fund management	Latvia	100%	100%
Luminor Investīciju Valdymas UAB	Pension fund management	Lithuania	100%	100%
Maksekeskus AS (a)	E-commerce payments	Estonia	99.8%	100%
Subsidiary being liquidated				
Salvus SIA	Buying and selling of own real estate	Latvia	100%	100%
Subsidiary liquidated in 2025				
Promano Lat SIA	Buying and selling of own real estate	Latvia	100%	0%

a. See also Note 13, 'Intangible assets', below

13. Intangible assets

€m	Goodwill (a)	Customer acquisition costs	Software	Other	Total
2024					
Accumulated cost					
Opening balance	49.1	1.8	44.4	3.0	98.3
Acquisition of MKK	-	-	-	-	-
Other additions	-	3.5	8.1	-	11.6
Disposals (b)	-	-	-3.3	-	-3.3
Closing balance	49.1	5.3	49.2	3.0	106.6
Accumulated amortisation and impairment					
Opening balance	-6.2	-0.4	-33.3	-2.4	-42.3
Amortisation (c)	-	-1.1	-2.7	-0.3	-4.1
Disposals	-	-	0.2	-	0.2
Impairment	-11.1	-	-	-	-11.1
Closing balance	-17.3	-1.5	-35.8	-2.7	-57.3
Carrying amount	31.8	3.8	13.4	0.3	49.3
of which assets under development					8.4
2025					
Accumulated cost					
Opening balance	49.1	5.3	49.2	3.0	106.6
Acquisition of MKK	0.1	-	-	-	0.1
Other additions	-	4.4	4.7	-	9.1
Disposals (b)	-	-0.6	-6.4	-3.0	-10.0
Closing balance	49.2	9.1	47.5	-	105.8
Accumulated amortisation and impairment					
Opening balance	-17.3	-1.5	-35.8	-2.7	-57.3
Amortisation (c)	-	-2.2	-2.9	-0.3	-5.4
Disposals	-	0.6	0.2	3.0	3.8
Impairment	-9.7	-0.2	-	-	-9.9
Closing balance	-27.0	-3.3	-38.5	-	-68.8
Carrying amount	22.2	5.8	9.0	-	37.0
of which assets under development					1.9

a. See also Note 12, 'Investments in associates and subsidiaries', above.

b. Disposals under category Software include derecognition of capitalized software costs of 5.8 million EUR (2024: 2.9 million EUR).

c. Amortisation of Customer acquisition costs and Other Intangible assets, total amount of 2.4 million EUR in 2025 (1.4 million EUR in 2024), is presented under Net fee and commission income line item in Statement of Profit or Loss

The goodwill, which is recognized as part of business combination, is attributable mainly to the business potential of Maksekeskus AS. To determine the value-in-use of Maksekeskus the following assumptions were used:

Assumption	Approach used to determine values	Values 2024	Values 2025
Revenue growth rate 1–5 years	Annual growth rate over the five-year forecast period, by countries and methods; based on past performance and management's expectations of market development	average 18%	average 13%
EBITDA growth rate 6–10 years	Declining annual EBITDA growth	average 10%	average 12%
Long-term growth rate / Terminal growth rate	2024: ECB forecast 2022–2025 2025: IMF forecast for Estonia adjusted by inflation premium	2.2%	2.5%
Pre-tax discount rate	Conservative and prudent estimate considering WACC	9.62%	10.64%

In 2022, we acquired control of Maksekeskus AS when we purchased 99% of its issued share capital for a cash consideration of 53.4 million EUR, including cash balances of 5.3 million EUR. In 2023, we purchased a further 0.8% of the issued share capital for a cash consideration of 0.3 million EUR. In June 2025 we completed the purchase of the outstanding minority interest in Maksekeskus.

Goodwill was tested for impairment in December 2025. Assumptions used in the 2025 impairment tests were based on the prevailing financial plan considering latest forecasts and approved budgets. External market growth assumptions for the e-commerce sector are based on independent market data obtained from a third-party research firm. Inputs to these assumptions include current and projected developments in digital commerce, including expected sector expansion, shifts in consumer behaviour, and macroeconomic trends across the Baltic region. Management has reviewed these assumptions for consistency with the strategic priorities and long-term outlook, to ensure they provide a reliable basis for planning and performance evaluation.

Latest forecasts include initiatives for embedded financing and shipping. The forecast for the former is aligned with Maksekeskus' current and committed go-to-market sales and marketing strategy. Following steady growth in the pilot year, a linear growth model was used as a representation of the expected outcome from continuing activities. For the latter, the forecast is separated into three phases. The initial phase assumes that the strong, accelerating growth observed in the period to 2025 will continue in the near term, having in mind planned platforms coverage expansion in 2026. The second phase assumes a moderation of growth as the market begins to mature, and the third phase assumes a sustainable growth rate consistent with a more stable, mature business state.

Management considers the adopted assumptions to be reasonable and to progress in line with the performance observed. These initiatives are intended to support sustainable growth, strengthen the competitive position in the Baltic markets, and ensure that the Maksekeskus remains well-positioned to capture opportunities arising from continued expansion of e-commerce activity within the region.

The discount rate was reviewed and enhanced and was increased as compared to 2024 to reflect market rates. The goodwill impairment test in December 2025 resulted in 9.7 million EUR charge (2024: 11.1 million EUR). The additional impairment recognised in 2025 results from a combination of factors, notably lower margins compared to previous expectations, even as gross transaction volumes continued to grow.

The recoverable amount of Maksekeskus remains sensitive to changes in cash flow projections, discount rates and growth rates. Although forecasts have been updated and the discount rate refined, the sensitivity levels as of December 2025 are similar to those observed in December 2024: change by 1%-point in the long-term growth rate would have an impact of approximately 3 million EUR (compared to 4 million EUR in 2024), change by 1%-point in the revenue growth rate would have impact of approximately 3 million EUR (compared to 4 million EUR in 2024); reduction of these rates would result in additional impairment and vice versa. Similarly, a change by 1%-point in the pre-tax discount rate would have an impact of approximately 5 million EUR, unchanged from 2024 (increase of this rate would result in additional impairment and vice versa).

14. Tangible assets

€m	Property	Equipment	Right-of-use assets	Total
2024				
Accumulated cost				
Opening balance	0.9	18.1	46.1	65.1
Additions	-	1.3	0.9	2.2
Finance sublease	-	-	-1.1	-1.1
Sold	-0.2	-	-	-0.2
Disposals	-	-0.9	-0.9	-1.8
Closing balance	0.7	18.5	45.0	64.2
Accumulated depreciation				
Opening balance	-0.2	-13.4	-24.5	-38.1
Depreciation	0.0	-1.7	-5.0	-6.7
Finance sublease	-	-	1.2	1.2
Sold	0.1	-	-	0.1
Disposals	-	0.7	0.9	1.6
Closing balance	-0.1	-14.4	-27.4	-41.9
Carrying amount	0.6	4.1	17.6	22.3
2025				
Accumulated cost				
Opening balance	0.7	18.5	45.0	64.2
Additions	0.0	0.7	9.5	10.2
Finance sublease	-	-	-0.9	-0.9
Sold	-	-	-	-
Disposals	-	-4.3	-0.3	-4.6
Closing balance	0.7	14.9	53.3	68.9
Accumulated depreciation				
Opening balance	-0.1	-14.4	-27.4	-41.9
Depreciation	0.0	-1.5	-4.9	-6.4
Finance sublease	-	-	0.5	0.5
Sold	-	-	-	-
Disposals	-	4.3	0.3	4.6
Closing balance	-0.1	-11.6	-31.5	-43.2
Carrying amount	0.6	3.3	21.8	25.7

Most of the Right of Use assets relate to lease arrangements for head offices in Estonia, Latvia and Lithuania.

Lease liabilities, €m	2024	2025
Opening balance	24.8	20.0
New leases	0.4	0.0
Lease modifications / remeasurements	0.2	9.5
Termination of agreements	0.0	0.0
Interest	0.7	0.8
Payments	-6.1	-6.0
Closing balance	20.0	24.3

For Lease liabilities maturity structure refer to Note 26, 'Maturity of financial instruments', below

15. Other assets

€m	31 Dec 2024	31 Dec 2025
Payments in transit	17.5	18.0
Mandatory reserve balances with central banks	114.2	111.3
Term balances with banks (a)	2.3	15.2
Accounts receivables	8.7	6.1
Accrued income	8.7	6.0
Financial assets	151.4	156.6
Advance payments	17.1	18.4
Value Added Tax recoverable and other taxes	12.5	6.2
Other	1.9	1.8
Non-financial assets	31.5	26.4
Total	182.9	183.0
a. Of which pledged as security for derivatives contracts	1.9	15.0

16. Deposits from customers

€m	31 Dec 2024	31 Dec 2025
Individuals	4,988.1	5,214.7
Businesses	3,921.5	3,714.1
Financial institutions	194.6	223.1
Public sector	2,248.5	2,358.8
Total	11,352.7	11,510.7
By type		
Demand (a)	8,416.0	8,310.8
Term	2,936.7	3,199.9
Total	11,352.7	11,510.7
By country of registration		
Estonia, Latvia, and Lithuania	11,180.8	11,361.4
Rest of the European Union	71.7	49.4
Other	100.2	99.9
Total	11,352.7	11,510.7

a. See also Note 21, 'Derivatives', below

17. Debt securities issued

€m	First call date	Maturity date	Additional information	31 Dec 2024	31 Dec 2025
€500m, 0.01%	-	Mar 2025	Matured Mar 2025	491.8	-
€500m, 1.688%	-	Jun 2027		494.6	498.7
€500m, 2.653%	-	Sep 2029	Issued Sep 2025	-	499.4
Covered bonds				986.4	998.1
€300m, 7.25%	Jan 2025	Jan 2026	Redeemed Jan 2025	88.7	-
€300m, 0.539%	Sep 2025	Sep 2026	Redeemed Sep 2025	299.3	-
SEK500m, floating rate	Mar 2026	Mar 2027	See Note 31, 'Subsequent events', below	43.5	46.2
€300m, 7.75%	Jun 2026	Jun 2027		315.9	314.4
€300m, 4.042%	Sep 2027	Sep 2028		305.2	304.7
€300m, 3.551%	Jun 2028	Jun 2029	Issued Jun 2025	-	302.6
Senior bonds				1,052.6	967.9
€200m, 5.399%	Oct 2030	Oct 2035	Subordinated	199.0	199.5
Total				2,238.0	2,165.5
Of which accumulated fair value changes of hedged items				-10.7	-8.7

See also Note 21, 'Derivatives', below

Movement in Debt securities issued

€m	2024	2025
Opening balance	1,898.7	2,238.0
Cash inflow – debt securities issued	542.8	798.2
Cash outflow – debt securities redeemed or matured	-227.0	-880.8
Interest expense	59.4	70.1
Interest paid	-57.2	-64.6
Hedge effect	28.5	1.3
Other changes	-7.2	3.3
Closing balance	2,238.0	2,165.5

18. Other liabilities

€m	31 Dec 2024	31 Dec 2025
Payments in transit	60.8	38.6
Accrued liabilities	21.3	18.9
Account payables	11.4	7.5
Other	1.6	0.7
Financial liabilities	95.1	65.7
Accrued liabilities (related to Personnel expenses)	25.8	22.0
Received prepayments	2.8	5.3
Value Added Tax	1.5	3.4
Other tax liabilities	2.4	2.3
Other	6.8	8.4
Non-financial liabilities	39.3	41.4
Total	134.4	107.1

19. Additional Tier 1 capital

€m	First reset date	Maturity date	Additional information	31 Dec 2024	31 Dec 2025
€150m, 7.375%	Aug 2031	-	Issued Feb 2025	-	147.7
Total				-	147.7

20. Provisions

€m	2024			2025		
	Contingent liabilities	Legal and Other	Total	Contingent liabilities	Legal and Other	Total
Opening balance	21.4	6.6	28.0	19.0	15.5	34.5
Arising during the year	4.9	0.0	4.9	11.1	2.6	13.7
Other movements (a)	-7.3	8.9	1.6	-14.6	-3.6	-18.2
Movement	-2.4	8.9	6.5	-3.5	-1.0	-4.5
Closing balance	19.0	15.5	34.5	15.5	14.5	30.0
of which legal provisions		8.1	8.1		13.9	13.9

a. Other movements consisted mostly of stage changes, derecognition, and from revisions to the ECL measurement model assumptions. Luminor believes that any legal proceedings pending and for which provisions have not been created will not result in material losses. See also Note 23, 'Contingent liabilities', below

21. Derivatives

€m	31 Dec 2024			31 Dec 2025		
	Notional	Assets	Liabilities	Notional	Assets	Liabilities
Interest rate-related	3,823.8	57.9	26.8	5,166.9	49.0	10.7
Currency-related	749.1	13.9	2.9	743.9	1.9	4.4
Commodity-related	54.8	6.1	5.9	78.0	7.0	6.7
Total	4,627.7	77.9	35.6	5,988.8	57.9	21.8

Luminor applies hedge accounting to fair value hedges of Debt securities issued and, from January 2023, part of Deposits from customers. There is an economic relationship between the hedged item and the hedging instruments as the terms of the interest rate swaps match the terms of the fixed rate debt security issued. Luminor has established a hedge ratio of 1:1 for the hedging relationships, as the underlying risk of the interest rate swaps is identical to the hedged risk.

There is an economic relationship between the hedged item and the hedging instruments for part of Deposits from customers – Luminor aims to hedge interest rate risk stemming from the change in fair value of non-maturing deposits. Fair value hedge essentially decreases duration of hedged portfolio of non-maturity deposits – as fixed rate is received, and floating rate is paid – making it less sensitive towards volatility in financial markets. Deposit hedges are part of the Bank's interest rate risk management framework. Luminor has applied judgement that a part of Deposits from customers qualify for hedge accounting under EU carve-out version of IAS 39 although these deposits are due on demand and under regular IFRS requirements their FV cannot be less than the nominal amount, whereas portfolio hedging effect is recognised corresponding to the change in FV of designated customer deposits discounted at market interest rates over expected timing of their maturity.

To assess the hedge effectiveness of Deposits from customers portfolio part, Luminor uses the prospective (regression analysis) and retrospective tests and compares the changes in the fair value of the hedging instrument against the changes in the fair value of the hedged item attributable to the hedged risk. The effectiveness measurement is made on a cumulative basis. Ineffectiveness was clearly immaterial as at 31 December 2025. To assess the hedge effectiveness of Debt securities issued, Luminor uses the hypothetical derivative method and compares the changes in the fair value of the hedging instrument against the changes in the fair value of the hedged item attributable to the hedged risk. Ineffectiveness was clearly immaterial as at 31 December 2024 and 2025.

Fair value hedges

Hedging instruments €m	31 Dec 2024			31 Dec 2025		
	Notional	Assets	Liabilities	Notional	Assets	Liabilities
Deposits from customers	575.0	14.9	–	975.0	13.3	–
Debt securities issued	1,900.0	22.9	14.5	1,900.0	20.7	2.0
Total	2,475.0	37.8	14.5	2,875.0	34.0	2.0

See also Note 16, 'Deposits from customers' and Note 17, 'Debt securities issued', respectively, above

Summary of hedging instruments (interest rate swaps) and related hedged items, nominal amount, €m

Hedging instruments and receiving coupon	Effective date	Maturity date	Paying coupon	31 Dec 2024	31 Dec 2025
Demand deposits (according to NMD model)					
3.145%	Jan 2023	Jun 2025	3m Euribor	300.0	-
3.562%	Mar 2023	Jun 2026	6m Euribor	200.0	200.0
3.258%	Jun 2023	Dec 2027	6m Euribor	75.0	75.0
2.285%	Jan 2025	Sep 2030	3m Euribor	-	100.0
2.322%	Jan 2025	Jun 2031	3m Euribor	-	100.0
2.461%	Mar 2025	Jun 2029	6m Euribor	-	100.0
2.548%	Mar 2025	Jun 2032	3m Euribor	-	50.0
2.475%	Jan 2025	Dec 2032	6m Euribor	-	50.0
2.291%	Aug 2025	Jun 2030	6m Euribor	-	50.0
2.344%	Sep 2025	Mar 2030	6m Euribor	-	50.0
2.410%	Jul 2025	Sep 2032	3m Euribor	-	50.0
2.453%	Sep 2025	Sep 2031	6m Euribor	-	50.0
2.558%	Dec 2025	Dec 2033	3m Euribor	-	50.0
2.240%	Dec 2025	Dec 2028	6m Euribor	-	50.0
Total				575.0	975.0
Covered bonds					
€500m, 0.01%	Mar 2020	Mar 2025	6m Euribor +0.289%	500.0	-
€500m, 1.688%	May 2022	Jun 2027	3m Euribor +0.3395%	500.0	500.0
€500m, 2.653%	Sep 2025	Sep 2029	3m Euribor + 0.4798%	-	500.0
Total				1,000.0	1,000.0
Senior bonds					
€300m, 0.539%	Oct 2022	Sep 2025	3m Euribor -2.323%	300.0	-
€300m, 7.75%	Jun 2023	Jun 2026	6m Euribor +4.40%	300.0	300.0
€300m, 4.042%	Sep 2024	Sep 2027	3m Euribor +1.5335%	300.0	300.0
€300m, 3.551%	Jun 2025	Jun 2028	3m Euribor + 1.6085%	-	300.0
Total				900.0	900.0

Hedge ineffectiveness for fair value hedges €m	31 Dec 2024			31 Dec 2025		
	Changes in FV of hedging instruments	Changes in value of hedged items	Recognised in the Income Statement	Changes in FV of hedging instruments	Changes in value of hedged items	Recognised in the Income Statement
Deposits from customers	-0.7	0.7	0.0	-1.4	1.5	0.1
Debt securities issued	28.0	-31.3	-3.3	-3.7	-1.3	-5.0
Total	27.3	-30.6	-3.3	-5.1	0.2	-4.9

22. Income tax

€m	31 Dec 2024	31 Dec 2025
Current tax for the year	-47.2	-35.1
Adjustment of current tax for previous years	-1.6	-0.2
Deferred tax movement	-4.7	-1.1
Total	-53.5	-36.4
Profit before tax	255.7	192.1
Tax at the applicable tax rate	-46.3	-36.3
Effect of non-deductible expenses	-8.2	1.8
Effect of non-taxable income	2.7	-1.8
Other adjustments	-0.1	-
Adjustment of current tax for previous years	-1.6	-0.1
Total	-53.5	-36.4
Effective tax rate	21%	19%
Deferred tax assets		
Opening balance	10.0	4.9
Tax loss carry forwards utilised	-1.3	-2.0
Tax loss carry forwards derecognized	-2.2	-
Other deferred tax temporary changes	-1.6	2.4
Closing balance	4.9	5.3
Deferred tax liabilities		
Opening balance	1.1	0.7
Other deferred tax temporary changes	-0.4	1.6
Closing balance	0.7	2.3
Tax liabilities		
Other corporate income tax	22.3	8.0
Total	22.3	8.0

For applicable tax rates see Note 1, 'Material accounting policy information', above. Deferred tax asset was utilised against taxable profit.

23. Contingent liabilities

€m	31 Dec 2024	31 Dec 2025
Undrawn loan commitments	1,405.7	1,589.0
Performance guarantees	310.5	234.5
Financial guarantees	3.8	4.3
Other guarantees	363.6	382.3
Other commitments	181.1	216.3
Total	2,264.7	2,426.4

By stage and risk category

€m	31 Dec 2024				31 Dec 2025			
	Stage 1	2	3	Total	Stage 1	2	3	Total
Low risk	786.0	37.7	-	823.7	1,075.2	5.5	-	1,080.7
Moderate risk	1,164.3	160.7	-	1,325.0	1,070.3	215.0	-	1,285.3
High risk	7.4	88.9	-	96.3	11.3	35.6	-	46.9
Default	-	-	19.7	19.7	-	-	13.5	13.5
Total	1,957.7	287.3	19.7	2,264.7	2,156.8	256.1	13.5	2,426.4
Provisions	-2.8	-4.7	-11.5	-19.0	-9.9	-3.0	-2.6	-15.5
Total net of provisions	1,954.9	282.6	8.2	2,245.7	2,146.9	253.1	10.9	2,410.9

Movement by stage in provisions

€m	2024				2025			
	Stage 1	2	3	Total	Stage 1	2	3	Total
Opening balance	-1.8	-1.9	-17.7	-21.4	-2.8	-4.7	-11.5	-19.0
Arising during the year	-4.9	-	-	-4.9	11.1	-	-	11.1
Derecognition and other movements	3.9	-2.8	6.2	7.3	-18.2	1.7	8.9	-7.6
Movement	-1.0	-2.8	6.2	2.4	-7.1	1.7	8.9	3.5
Closing balance	-2.8	-4.7	-11.5	-19.0	-9.9	-3.0	-2.6	-15.5

Net decrease in Stage 3 provisions was driven in the main by decrease and maturing of contingent commitments to customers in the Service and Construction sectors. Derecognition and other movements consisted mostly of stage changes, derecognition, and from revisions to the ECL measurement model assumptions. See also Note 20, 'Provisions', above

24. Maximum exposure to credit risk

€m	Subject to ECL Assessment?	Notes	31 Dec 2024	31 Dec 2025
Cash and balances with central banks	Yes	9	3,106.3	1,937.6
Mandatory reserve balances with central banks	Yes	15	114.2	111.3
Balances with banks	Yes		63.6	55.5
Term balances with banks	Yes	15	2.3	15.2
Debt securities	Yes	10	1,514.0	1,993.5
Debt securities	No	10	156.2	98.8
Loans to customers	Yes	11	10,535.4	11,491.4
Derivatives	No	21	77.9	57.9
Other financial assets	Yes	15	34.9	30.1
On balance sheet assets			15,604.8	15,791.3
Contingent liabilities	Yes	23	2,245.7	2,426.4
Total			17,869.5	18,217.7

Amounts subject to ECL assessment are shown net of Expected credit losses. Cash and balances with central banks, Mandatory reserve balances with central banks, Balances with banks, and Term balances with banks are classified as 'Stage 1' assets, with immaterial expected credit losses. Other financial assets are mostly short term hence low credit risk simplification applied. See also Note 2 'General risk management policies', above.

25. Fair value of financial instruments

€m	IFRS 9 measurement	Fair value				Carrying amount
		Level 1	2	3	Total	
31 December 2024						
Cash and balances with central banks	AC	120.4	2,985.9	-	3,106.3	3,106.3
Balances with banks	AC	-	63.6	-	63.6	63.6
Debt securities	AC	1,466.3	-	12.1	1,478.4	1,511.1
Debt securities	FVTPLD	132.7	-	-	132.7	132.7
Debt securities	FVTPLM	20.7	-	2.8	23.5	23.5
Debt securities	FVTOCI	2.9	-	-	2.9	2.9
Loans to customers	AC	-	-	10,804.7	10,804.7	10,535.4
Derivatives	FVTPLM	-	77.9	-	77.9	77.9
Equity instruments	FVTPLM	-	3.0	-	3.0	3.0
Equity instruments	FVTOCI	-	-	0.5	0.5	0.5
Other	AC	-	151.4	-	151.4	151.4
Total assets		1,743.0	3,281.8	10,820.1	15,844.9	15,608.3
Loans and deposits from credit institutions	AC	-	192.9	-	192.9	192.9
Deposits from customers	AC	-	8,416.0	2,945.1	11,361.1	11,352.7
Debt securities issued	AC	-	2,457.5	-	2,457.5	2,238.0
Derivatives	FVTPLM	-	35.6	-	35.6	35.6
Other	AC	-	95.1	-	95.1	95.1
Total liabilities		-	11,197.1	2,945.1	14,142.2	13,914.3
31 December 2025						
Cash and balances with central banks	AC	120.0	1,817.6	-	1,937.6	1,937.6
Balances with banks	AC	-	55.5	-	55.5	55.5
Debt securities	AC	1,964.9	-	-	1,964.9	1,992.0
Debt securities	FVTPLD	83.9	-	-	83.9	83.9
Debt securities	FVTPLM	13.8	-	1.1	14.9	14.9
Debt securities	FVTOCI	1.5	-	-	1.5	1.5
Loans to customers	AC	-	-	11,713.5	11,713.5	11,491.4
Derivatives	FVTPLM	-	57.9	-	57.9	57.9
Equity instruments	FVTPLM	-	3.7	-	3.7	3.7
Equity instruments	FVTOCI	-	-	0.5	0.5	0.5
Other	AC	-	156.6	-	156.6	156.6
Total assets		2,184.1	2,091.3	11,715.1	15,990.5	15,795.5
Loans and deposits from credit institutions	AC	-	142.6	-	142.6	142.6
Deposits from customers	AC	-	8,310.8	3,195.0	11,505.8	11,510.7
Debt securities issued	AC	-	2,164.4	-	2,164.4	2,165.5
Derivatives	FVTPLM	-	21.8	-	21.8	21.8
Other	AC	-	65.7	-	65.7	65.7
Total liabilities		-	10,705.3	3,195.0	13,900.3	13,906.3

Change in debt securities recorded in Level 3

€m	2024	2025
Opening balance	15.8	14.9
Disposals	-3.0	-13.9
Unrealised gains on assets held at the end of the reporting period	2.1	0.1
Closing balance	14.9	1.1

26. Maturity of financial instruments

€m	Month 1	Months 2-3	Months 4-12	Years 2-5	>5 years	Total
31 December 2024						
Cash and balances with central banks	3,106.3	-	-	-	-	3,106.3
Balances with banks	63.6	-	-	-	-	63.6
Debt securities	59.6	30.8	198.7	1,016.3	364.8	1,670.2
Loans to customers	97.9	566.7	1,525.0	4,067.6	4,278.2	10,535.4
Derivatives	11.1	5.6	11.4	45.4	4.4	77.9
Equity instruments	3.5	-	-	-	-	3.5
Other	151.4	-	-	-	-	151.4
Total financial assets	3,493.4	603.1	1,735.1	5,129.3	4,647.4	15,608.3
Total financial liabilities	9,722.4	2,061.9	1,658.7	285.7	205.6	13,934.3
Net financial assets (-liabilities)	-6,229.0	-1,458.8	76.4	4,843.6	4,441.8	1,674.0
Contingent liabilities	2,264.7	-	-	-	-	2,264.7
Liquidity gap	-8,493.7	-1,458.8	76.4	4,843.6	4,441.8	-590.7
31 December 2025						
Cash and balances with central banks	1,937.6	-	-	-	-	1,937.6
Balances with banks	55.5	-	-	-	-	55.5
Debt securities	18.1	26.6	262.2	1,146.5	638.9	2,092.3
Loans to customers	91.1	496.6	1,626.9	4,570.6	4,706.2	11,491.4
Derivatives	4.9	2.7	21.0	22.8	6.5	57.9
Equity instruments	4.2	-	-	-	-	4.2
Other	156.6	-	-	-	-	156.6
Total financial assets	2,268.0	525.9	1,910.1	5,739.9	5,351.6	15,795.5
Total financial liabilities	9,450.5	844.5	1,701.7	1,925.2	8.7	13,930.6
Net financial assets (-liabilities)	-7,182.5	318.6	208.4	3,814.7	5,342.9	1,864.9
Contingent liabilities	2,426.4	-	-	-	-	2,426.4
Liquidity gap	-9,608.9	-318.6	208.4	3,814.7	5,342.9	-561.5

The Month 1 liquidity gap is driven by demand deposits, the Months 2-3 liquidity gap is driven by short term demand deposits. Both classes of deposits have been stable historically. See also Note 2 'General risk management policies, above.

Liabilities
€m

€m	Contracted undiscounted cash flows						Discount effect	Carrying amount
	Month 1	Months 2-3	Months 4-12	Years 2-5	>5 years	Total		
31 December 2024								
Loans and deposits from credit institutions	83.4	7.6	9.1	100.6	-	200.7	-7.8	192.9
Deposits from customers	9,101.6	1,050.9	1,531.1	71.7	5.2	11,760.5	-407.8	11,352.7
Debt securities issued	312.6	500.7	369.9	1248.7	210.4	2,642.3	-404.3	2,238.0
Derivatives (see also table below)	6.6	9.9	-1.7	18.1	2.6	35.5	0.1	35.6
Lease liabilities	0.5	1.0	4.2	14.0	1.9	21.6	-1.6	20.0
Other	95.1	-	-	-	-	95.1	0.0	95.1
Contingent liabilities	2,264.7	-	-	-	-	2,264.7	0.0	2,264.7
Total	11,864.5	1,570.1	1,912.6	1,453.1	220.1	17,020.4	-821.4	16,199.0
31 December 2025								
Loans and deposits from credit institutions	60.9	0.0	22.0	62.8	0.0	145.7	-3.1	142.6
Deposits from customers	9,319.5	797.0	1,373.9	36.5	4.5	11,531.4	-20.7	11,510.7
Debt securities issued	0.0	46.7	83.7	2,243.3	0.0	2,373.7	-208.2	2,165.5
Derivatives (see also table below)	8.2	1.3	-5.5	14.0	2.7	20.7	1.1	21.8
Lease liabilities	0.2	1.0	4.5	18.8	1.9	26.4	-2.1	24.3
Other	65.7	-	-	-	-	65.7	0.0	65.7
Contingent liabilities	2,426.4	-	-	-	-	2,426.4	0.0	2,426.4
Total	11,880.9	846.0	1,478.6	2,375.4	9.1	16,590.0	-233.0	16,357.0

of which Derivatives
€m

	Month 1	Months 2-3	Months 4-12	Years 2-5	>5 years	Total
31 December 2024						
Inflow	-105.9	-37.5	-14.1	-0.4	0.0	-157.9
Outflow	107.8	38.2	14.4	0.4	0.0	160.8
Gross settled derivatives	1.9	0.7	0.3	0.0	0.0	2.9
Net settled derivatives	4.7	9.2	-2.0	18.1	2.6	32.6
Total	6.6	9.9	-1.7	18.1	2.6	35.5
31 December 2025						
Inflow	-288.0	-95.0	-47.7	-	-	-430.7
Outflow	290.4	95.9	47.7	-	-	434.0
Gross settled derivatives	2.4	0.9	0.0	-	-	3.3
Net settled derivatives	5.8	0.4	-5.5	14.0	2.7	17.4
Total	8.2	1.3	-5.5	14.0	2.7	20.7

27. Offsetting financial instruments

€m	Gross carrying amounts	Offset	Net amounts	Netting	Cash collateral	Net exposure
31 December 2024						
Loans to customers	963.2	-	963.2	-963.2	-	-
Debt securities at amortised cost	101.8	-	101.8	-23.2	-	78.6
Derivatives	77.9	-	77.9	-5.2	-58.9	13.8
Total assets	1,142.9	-	1,142.9	-991.6	-58.9	92.4
Debt securities issued	986.4	-	986.4	-986.4	-	-
Derivatives	35.6	-	35.6	-5.2	-1.9	28.5
Total liabilities	1,022.0	-	1,022.0	-991.6	-1.9	28.5
31 December 2025						
Loans to customers	948.4	-	948.4	-948.4	-	-
Debt securities at amortised cost	101.6	-	101.6	-49.7	-	51.9
Derivatives	57.9	-	57.9	-5.2	-31.8	20.9
Total assets	1,107.9	-	1,107.9	-1,003.3	-31.8	72.8
Debt securities issued	998.1	-	998.1	-998.1	-	-
Derivatives	21.8	-	21.8	-5.2	-5.1	11.5
Total liabilities	1,019.9	-	1,019.9	-1,003.3	-5.1	11.5

Amounts shown under 'Netting' and 'Cash collateral' are subject to master netting and similar arrangements and are not set off in the Statement of Financial Position. Cash collateral pledged (shown under assets) and cash collateral received (shown under liabilities) relate to derivatives positions and are included in 'Other assets' and 'Loans and deposits from credit institutions' respectively.

28. Customer segments

€m	2024				2025			
	Retail	Corporate	Other	Total	Retail	Corporate	Other	Total
Interest and similar income	335.6	328.3	137.9	801.8	267.9	257.3	88.7	613.9
Interest and similar expense	-63.3	-107.9	-122.9	-294.1	-51.2	-77.6	-65.3	-194.1
Net interest and similar income	272.3	220.4	15.0	507.7	216.7	179.7	23.4	419.8
Fee and commission income	83.6	36.3	0.7	120.6	82.1	36.5	0.8	119.4
Fee and commission expense	-20.4	-10.2	-0.4	-31.0	-23.0	-10.0	-1.0	-34.0
Net fee and commission income	63.2	26.1	0.3	89.6	59.1	26.5	-0.2	85.4
Net gain from financial items	5.7	10.6	16.5	32.8	4.9	14.8	9.5	29.2
Other	-0.1	-0.6	3.4	2.7	-0.4	-1.4	4.6	2.8
Net other operating income	5.6	10.0	19.9	35.5	4.5	13.4	14.1	32.0
Total operating income (a)	341.1	256.5	35.2	632.8	280.3	219.6	37.3	537.2
Personnel expenses	-92.5	-53.4	-1.5	-147.4	-99.6	-52.2	-1.8	-153.6
Other administrative expenses	-117.9	-54.0	-5.2	-177.1	-117.5	-49.1	-5.4	-172.0
Depreciation, amortisation, impairment and other	-6.2	-14.2	-0.1	-20.5	-6.5	-12.8	-0.1	-19.4
Total operating expenses	-216.6	-121.6	-6.8	-345.0	-223.6	-114.1	-7.3	-345.0
Profit before credit losses and taxes	124.5	134.9	28.4	287.8	56.7	105.5	30.0	192.2
Expected credit losses	13.9	-13.5	0.9	1.3	7.2	-7.0	1.7	1.9
Bank taxes and resolution fee	-	-	-33.4	-33.4	-	-	0.0	0.0
Profit (-loss) before tax	138.4	121.4	-4.1	255.7	63.9	98.5	31.7	194.1
a. of which internal transactions	-6.0	4.6	1.4	-	-12.7	-11.9	24.6	-
of which Fee and commission income								
Cards	32.5	12.5	0.0	45.0	32.2	13.2	0.0	45.4
Credit products	0.5	5.0	0.0	5.5	0.4	4.7	0.0	5.1
Daily banking plans	19.3	0.5	0.0	19.8	20.1	0.6	0.1	20.8
Deposit products and cash management	7.9	5.5	0.3	13.7	7.1	5.6	0.1	12.8
Insurance	3.5	0.6	0.0	4.1	3.8	0.6	0.0	4.4
Investments	3.7	1.2	0.0	4.9	4.6	1.3	0.1	6.0
Pensions	15.5	0.0	-	15.5	13.2	0.2	-	13.4
Trade finance	0.1	10.5	0.3	10.9	0.1	9.8	0.0	9.9
Other	0.6	0.5	0.1	1.2	0.6	0.5	0.5	1.6
Total	83.6	36.3	0.7	120.6	82.1	36.5	0.8	119.4

Customer balances

€m	31 Dec 2024				31 Dec 2025			
	Retail	Corporate	Other	Total	Retail	Corporate	Other	Total
Loans to customers	5,900.1	4,632.2	3.1	10,535.4	6,477.9	5,013.5	0.0	11,491.4
Deposits from customers	6,119.2	5,196.9	36.6	11,352.7	6,320.5	5,156.9	33.3	11,510.7

Luminor has defined intersegment revenues as internal interest income and expense related to the funding operating segments by Treasury. Treasury updated the intersegment revenue framework in 2025 to meet regulatory expectations for full risk-transfer, under which all base-rate income is allocated now to Treasury. The results for 2024 were restated to reflect this change.

29. Related parties

€m	2024			2025		
	Significant influence	Key personnel	ALD Automotive	Significant influence	Key personnel	ALD Automotive
Interest income	0.1	0.0	0.7	0.4	0.0	0.9
Interest expense	-0.6	0.0	0.0	-0.2	0.0	0.0
Net interest income	-0.5	0.0	0.7	0.2	0.0	0.9
Fee and commission income	0.0	0.0	0.0	0.0	0.0	0.0
Fee and commission expense	-0.1	0.0	0.0	-0.1	0.0	0.0
Net fee and commission income	-0.1	0.0	0.0	-0.1	0.0	0.0
Net gain from financial instruments at fair value	6.0	0.0	0.0	0.1	0.0	0.0
Personnel expenses	-	-6.8	-	-	-7.1	-
Other operating expenses	-4.7	-	-0.1	-1.0	-	-0.1
Other income and expenses	0.0	0.0	0.0	0.0	0.0	0.0
Total	0.7	-6.8	0.6	-0.8	-7.1	0.8

€m	31 Dec 2024			31 Dec 2025		
	Significant influence	Key personnel	ALD Automotive	Significant influence	Key personnel	ALD Automotive
Assets						
Balances with banks	2.0	-	-	1.5	-	-
Loans to customers	-	0.2	23.3	-	0.5	17.9
Debt securities	9.6	-	-	19.8	-	-
Derivatives	8.5	-	-	4.5	-	-
Other	0.0	0.0	0.1	0.0	0.0	0.0
Total	20.1	0.2	23.4	25.8	0.5	17.9
Liabilities						
Loans and deposits from credit institutions	10.9	-	-	8.1	-	-
Deposits from customers	-	0.4	1.0	-	0.6	0.5
Derivatives	0.0	-	-	1.4	-	-
Provisions	-	0.1	0.0	-	0.0	0.0
Other	0.2	0.0	0.1	1.0	0.0	0.1
Total	11.1	0.5	1.1	10.5	0.6	0.6

We enter banking transactions with related parties in the normal course of business. At 31 December 2024 and 2025 no loans due from related parties were classified as Stage 3. In 2025 dividends of 101.1 million EUR were paid to Luminor Holding (2024: 294.5 million EUR).

Related parties

Blackstone owned and managed entities, and DNB Bank, are entities with significant influence. The changes in profit or loss items and balance sheet positions are largely driven by derivatives and related cash collateral positions with respective parties. Associated companies are the three ALD Automotive entities, one in each of Estonia, Latvia, and Lithuania.

Key management personnel

In case of employment termination members of the Management Board and other key management personnel are entitled to a maximum of 12-months of non-compete restrictions. No other benefits, except risk-adjusted performance based variable remuneration, are applied

30. Country information

€m	2024				2025			
	Estonia	Latvia	Lithuania	Total	Estonia	Latvia	Lithuania	Total
Interest and similar income	182.7	226.7	392.4	801.8	130.8	168.2	314.9	613.9
Fee & commission income	20.2	37.9	62.5	120.6	19.3	35.1	65.0	119.4
Sales revenue (a)	202.9	264.6	454.9	922.4	150.1	203.3	379.9	733.3
Profit before tax (b)	11.4	76.8	167.5	255.7	11.2	48.1	134.8	194.1
Eliminations	-30.5	0.0	30.5	0.0	-35.9	5.5	30.4	0.0
Income tax	3.5	14.7	35.3	53.5	2.0	7.5	26.9	36.4
Number of employees (Full Time Equivalent)	589	900	987	2,476	649	921	1,043	2,613

Customer balances, €m	31 Dec 2024				31 Dec 2025			
	Estonia	Latvia	Lithuania	Total	Estonia	Latvia	Lithuania	Total
Loans to customers	2,302.9	2,815.3	5,417.2	10,535.4	2,489.1	2,900.1	6,102.2	11,491.4
Deposits from customers	1,270.0	3,047.2	7,035.5	11,352.7	1,008.5	3,126.5	7,375.7	11,510.7

- a. Sum of Interest and similar income and fee and commission income after intragroup eliminations
b. Excludes intragroup dividend income

The disclosure above is required by Article 89 of the EU Capital Requirements Directive IV (CRD IV) as implemented by the Estonian Credit Institutions Act § 92. No state support was received.

31. Subsequent events

On 27 January 2026 we announced the redemption of our 500 million SEK floating rate senior notes, due March 2027. The notes will be redeemed on 27 March 2026, the optional redemption date, at 100% of their nominal amount, together with accrued but unpaid interest. The listing of the notes on the Irish Stock Exchange will be cancelled thereafter.

32. Financial statements of Luminor Bank as a separate entity

Luminor Bank's unconsolidated primary financial statements have been prepared in accordance with the Estonian Accounting Act and are not separate financial statements of Luminor Bank AS in the meaning of IAS 27 'Separate financial statements'.

STATEMENT OF PROFIT OR LOSS

€m	2024	2025
Interest income calculated using the effective interest method	778.2	585.9
Other similar income	0.4	0.8
Interest and similar expense	-294.9	-194.8
Net interest and similar income	483.7	391.9
Fee and commission income	97.1	97.7
Fee and commission expense	-27.1	-27.9
Net fee and commission income	70.0	69.8
Net gain from financial instruments at fair value	45.6	3.0
Net gain on derecognition of financial assets measured at amortised cost	0.2	3.7
Net gain from foreign currency operations	-13.4	22.3
Other operating income	8.3	8.5
Dividends received	42.4	0.9
Net other operating income	83.1	38.4
Total operating income	636.8	500.1
Personnel expenses	-139.8	-145.8
Other administration expenses	-167.2	-158.7
Depreciation, amortisation and impairment	-48.3	-18.4
Losses on derecognition of non-financial assets - net	-2.1	-5.8
Total operating expenses	-357.4	-328.7
Profit before credit losses, bank taxes, and tax	279.4	171.4
Expected credit losses	4.9	1.9
Bank taxes and resolution fee	-33.4	0.0
Profit before tax	250.9	173.3
Income tax expenses	-52.6	-34.6
Profit for the period	198.3	138.7
Total comprehensive income	198.3	138.7
Profit for the period attributable to:		
Additional Tier 1 capital holders	-	9.8
Shareholder of Luminor Bank	198.3	128.9
Profit for the period	198.3	138.7

STATEMENT OF FINANCIAL POSITION

€m	31 Dec 2024	31 Dec 2025
Assets		
Cash and balances with central banks	3,106.3	1,937.6
Balances with banks	63.3	55.1
Debt securities	1,670.2	2,092.3
Loans to customers	10,486.2	11,397.5
Derivatives	77.9	57.9
Equity instruments	0.5	0.5
Investments in subsidiaries	205.5	195.6
Intangible assets	11.2	5.7
Tangible assets	21.5	25.1
Current tax assets	-	5.0
Deferred tax assets	4.9	5.2
Other assets	170.4	173.6
Total	15,817.9	15,951.1
Liabilities		
Loans and deposits from credit institutions	192.9	142.6
Deposits from customers	11,520.8	11,652.8
Fair value of changes of hedge items in hedges of interest rate	6.2	4.7
Debt securities issued	2,238.0	2,165.5
Derivatives	35.6	21.8
Tax liabilities	22.1	7.0
Deferred tax liabilities	0.7	2.2
Lease liabilities	19.9	24.3
Other liabilities	119.5	93.0
Provisions	34.1	29.5
Total	14,189.8	14,143.4
Equity		
Share capital	34.9	34.9
Share premium	1,412.2	1,412.2
Retained earnings	177.4	209.4
Other reserves	3.6	3.5
Shareholders' equity	1,628.1	1,660.0
Additional Tier 1 capital	-	147.7
Total	1,628.1	1,807.7
Total liabilities and equity	15,817.9	15,951.1

STATEMENT OF CHANGES IN EQUITY

€m	Share capital	Share premium	Retained earnings	Other reserves	Shareholder equity	Additional Tier 1 capital	Total
Balance as at 31 December 2023	34.9	1,412.2	273.6	3.5	1,724.2	-	1,724.2
Profit for the period	-	-	198.3	-	198.3	-	198.3
Total comprehensive income	-	-	198.3	-	198.3	-	198.3
Distributions	-	-	-	-	-	-	-
Dividends	-	-	-294.5	-	-294.5	-	-294.5
Other	-	-	-	0.1	0.1	-	0.1
Balance as at 31 December 2024	34.9	1,412.2	177.4	3.6	1,628.1	-	1,628.1
Balance as at 31 December 2024	34.9	1,412.2	177.4	3.6	1,628.1	-	1,628.1
Profit for the period	-	-	133.2	-	133.2	5.5	138.7
Total comprehensive income	-	-	133.2	-	133.2	5.5	138.7
Distributions	-	-	-	-	-	-5.5	-5.5
Dividends	-	-	-101.1	-	-101.1	-	-101.1
Other	-	-	-0.1	-0.1	-0.2	147.7	147.5
Balance as at 31 December 2025	34.9	1,412.2	209.4	3.5	1,660.0	147.7	1,807.7

€m	31 Dec 2024	31 Dec 2025
Equity capital of the parent undertaking	1,628.1	1,807.7
Value of subsidiaries in the unconsolidated statement of financial position of the parent	-205.5	-195.5
Value of subsidiaries under equity method	263.9	272.2
Total	1,686.5	1,884.4

STATEMENT OF CASH FLOWS

€m	2024	2025
Profit before tax	250.9	173.3
Adjustments:		
Expected credit losses	-5.1	-1.9
Depreciation, amortisation and impairment	8.4	8.7
Derecognition of non-financial assets	2.1	6.3
Gain/loss on derecognition of associates	-	-0.9
Other items	-	-
Interest and similar income	-778.6	-586.7
Interest and similar expenses	294.9	194.8
Dividend income	-42.4	-0.9
Write-off of investments in subsidiaries	39.9	9.7
Change in operating assets/liabilities:		
Increase (-) / decrease (+) of lending to customers	-58.6	-2,921.3
Increase (-) / decrease (+) of debt securities	-175.7	1,592.8
Increase (-) / decrease (+) of other assets	8.5	21.4
Increase (+) / decrease (-) of deposits from customers	65.1	142.8
Increase (+) / decrease (-) of other liabilities	-49.7	-78.6
Interest received	799.7	576.4
Interest paid	-304.2	-210.6
Income tax paid	-52.1	-53.5
Cash flows from operating activities	3.1	-1,128.2
Payment for acquisition of subsidiaries	-	0.1
Acquisition of tangible and intangible assets	-8.1	-3.9
Proceeds from disposal of tangible assets	0.2	-
Proceeds from disposal of investment in associate	-	0.9
Dividend received	42.4	0.9
Cash flows from investing activities	34.5	-2.0
Debt securities and Additional Tier 1 instruments issued	542.8	945.9
Debt securities redeemed or matured	-227.0	-880.8
Payments of principal on leases	-4.7	-5.2
Distributions paid on Additional Tier 1 capital	-	-5.5
Dividends paid	-294.5	-101.1
Cash flows from financing activities	16.6	-46.7
Net increase (+) or decrease (-) in cash and cash equivalents	54.2	-1,176.9
Cash and cash equivalents at the beginning of the period	3,115.4	3,169.6
Effects of currency translation on cash and cash equivalents	0.0	0.0
Net increase or decrease in cash and cash equivalents	54.2	-1,176.9
Cash and cash equivalents at the end of the period	3,169.6	1,992.7
Cash and cash equivalents		
Cash on hand	120.4	120.0
Balances with central banks less mandatory reserve requirement	2,985.9	1,817.6
Balances with banks due within three months less cash collateral	63.3	55.1
Total	3,169.6	1,992.7

INDEPENDENT AUDITOR'S REPORT

To the Shareholder of Luminor Bank AS

REPORT ON THE AUDIT OF THE CONSOLIDATED FINANCIAL STATEMENTS

OUR OPINION

In our opinion, the consolidated financial statements present fairly, in all material respects, the consolidated financial position of Luminor Bank AS (the "Bank") and its subsidiaries (together – the "Group") as at 31 December 2025, and the Group's consolidated financial performance and consolidated cash flows for the year then ended in accordance with International Financial Reporting Standards (IFRS) as adopted by the European Union.

Our opinion is consistent with our additional report to the Audit Committee dated 24 March 2026.

What we have audited

The Group's consolidated financial statements comprise:

- the consolidated statement of profit or loss for the year ended 31 December 2025;
- the consolidated statement of financial position as at 31 December 2025;
- the consolidated statement of changes in equity for the year then ended;
- the consolidated statement of cash flows for the year then ended; and
- the notes to the consolidated financial statements, comprising material accounting policy information and other explanatory information.

BASIS FOR OPINION

We conducted our audit in accordance with International Standards on Auditing (Estonia) (ISAs (EE)). Our responsibilities under those standards are further described in the Auditor's responsibilities for the audit of the consolidated financial statements section of our report.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Independence

We are independent of the Group in accordance with the ethical requirements of Regulation (EU) No 537/2014 that are relevant to audits of financial statements of public interest entities, and Code of Ethics for Professional Accountants (Estonia) (including Independence Standards) as adopted by Auditing Activities Oversight Board (Code of Ethics (Estonia)), as applicable to audits of financial statements of public interest entities. We have also fulfilled our other ethical responsibilities in accordance with the ethical requirements of the Regulation (EU) No 537/2014 and the Code of Ethics (Estonia).

To the best of our knowledge and belief, we declare that non-audit services that we have provided to the Bank and its parent and subsidiaries within the European Union are in accordance with the applicable law and regulations in the Republic of Estonia and that we have not provided non-audit services that are prohibited under § 59¹ of the Auditors Activities Act of the Republic of Estonia.

The non-audit services that we have provided to the Bank and its parent and subsidiaries in the period from 1 January 2025 to 31 December 2025 are disclosed in the Note 7 to the consolidated financial statements.

OUR AUDIT APPROACH

- Overall group audit materiality is EUR 10.0 million, which represents approximately 5% of Profit Before Tax of the Group for 2025.
- A full scope audit was performed by us or, under our instructions, by other PwC network firms for Group entities covering substantially all of the Group's consolidated assets and revenues. Selected audit procedures were performed on remaining balances to ensure we obtained sufficient appropriate audit evidence to express an opinion on the Group's financial statements as a whole.
- Key audit matter relates to expected credit loss on loans to customers.

As part of designing our audit, we determined materiality and assessed the risks of material misstatement in the consolidated financial statements. In particular, we considered where the Management Board made subjective judgments; for example, in respect of significant accounting estimates that involved making assumptions and considering future events that are inherently uncertain. As in all of our audits, we also addressed the risk of management override of internal controls, including, among other matters, consideration of whether there was evidence of bias that represented a risk of material misstatement due to fraud.

Materiality

The scope of our audit was influenced by our application of materiality. An audit is designed to obtain reasonable assurance whether the consolidated financial statements are free from material misstatement. Misstatements may arise due to fraud or error. They are considered material if individually or in aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the consolidated financial statements.

Based on our professional judgment, we determined certain quantitative thresholds for materiality, including the overall Group materiality for the consolidated financial statements as a whole as set out in the table below. These, together with qualitative considerations, helped us to determine the scope of our audit and the nature, timing and extent of our audit procedures and to evaluate the effect of misstatements, if any, both individually and in aggregate on the consolidated financial statements as a whole.

Overall Group materiality	EUR 10.0 million
How we determined it	Approximately 5% of Profit Before Tax of the Group for 2025
Rationale for the materiality benchmark applied	We have applied this benchmark, as in our view, this is against which the performance of the Group is most commonly measured by users, and is a generally accepted benchmark. We chose 5% which is within the range of acceptable quantitative materiality thresholds in auditing standards

Key audit matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the consolidated financial statements of the current period. These matters were addressed in the context of our audit of the consolidated financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

Key audit matter

Expected credit losses on loans to customers (refer to Note 1 “Material accounting policy information”, Note 2 “General risk management policies” and Note 11 “Loans to customers” for further details)

As at 31 December 2025, the net carrying amount of loans to customers amounted to EUR 11,491.4 million and related credit loss allowance amounted to EUR 105.9 million.

We focused on this area because application of IFRS 9 “Financial instruments” 3-stage expected credit loss (ECL) model requires management to use complex models with subjective inputs to assess the timing and the amount of expected credit losses.

The Group's loan portfolio includes individually significant exposures for which the level of expected credit losses is estimated on an individual basis, while a portfolio approach is used with statistical models for each of the homogeneous portfolios identified by the Group.

Key areas requiring significant management judgements and modelling include:

- evaluating the criteria for assessment of significant increase in credit risk and allocation of loans to stage 1, 2 or 3;
- assessing accounting interpretations and modelling assumptions used to build the models that calculate ECL;
- the modelling and calculation of key parameters of ECL model, including probability of default (PD), loss given default (LGD) and exposure at default (EAD);
- determining the macro-economic indicators and incorporating forward-looking information into the ECL model;
- estimating the above-mentioned indicators for reliable future period and for three different scenarios (baseline, optimistic and pessimistic) and assigning probabilities to those scenarios; and
- estimating ECL under base case and risk case scenarios for Stage 3 individual assessments and assigning probabilities to those scenarios.

The performance of the models is monitored by comparing the outcomes estimated by the models to actual credit losses (backtesting procedures) to ensure that the level of allowance for expected credit losses in the portfolio of loans and advances to customers is appropriate.

How our audit addressed the key audit matter

We assessed whether the Group's accounting policies and methodology applied for the calculation of impairment of loans to customers are in compliance with IFRS 9.

We assessed the design and operating effectiveness of key controls over ECL data and respective calculations, including:

- IT general controls over relevant systems;
- IT application controls over exposure balances and overdue information;
- automated application of staging of loans (including applying the criteria for determining significant increase in credit risk and definition of default),
- automated calculations of ECL for stages 1, 2 and 3 collective;
- review and approval of customer credit rating grades;
- review and update of collateral values and correctness of the respective information in the loan systems which serve as an input into the ECL model;
- existence of approved customer analysis before loan disbursement;
- review and approval of ECL calculations for individual material exposures (stage 3);

We performed detailed audit procedures in the following areas:

- the completeness and accuracy of data used in the ECL calculation system;
- the compliance of key inputs used in ECL calculation system with IFRS 9 methodology;
- the existence of valid collateral contracts; the accuracy of LGD calculation which serves as an input into the ECL model;
- recalculation expected credit losses for a selected sample of credit exposures;
- analytical procedures on portfolio coverage by expected credit losses and changes therein during the audited year, as well as movements of exposures between Stages;
- an analysis of subsequent events to assess whether any adjustment to expected credit losses estimates as at the reporting date was required;
- the completeness of loans subject to stage 3 assessment and related ECL calculations; and
- for selected impaired loans (Stage 3 individual), the assumptions used to calculate impairment allowances, in particular the expected scenarios and the probabilities assigned to them, as well as the timing and amounts of expected cash flows, including repayments and enforcement of collaterals.

We have assessed the reasonableness of procedures related to the historical validation of models through comparison of estimated results with actual credit losses (backtesting).

We have assessed the reasonableness of key assumptions made by management, which serve as critical inputs in the ECL model, such as weights of different scenarios, point in time PD and LGD estimates, key forecasts of macroeconomic information and multipliers used for different scenarios.

We also assessed the adequacy and completeness of disclosures in the consolidated financial statements in accordance with applicable accounting standards.

How we tailored our Group audit scope

We tailored the scope of our audit in order to perform sufficient work to enable us to provide an opinion on the consolidated financial statements as a whole, taking into account the structure of the Group, the accounting processes and controls, and the industry in which the Group operates.

The Group comprises a number of entities operating in Estonia, Latvia and Lithuania, including branches of the Bank in Latvia and Lithuania (see further information on the Group structure in Note 12 to the consolidated financial statements). Based on our risk and materiality assessments, we determined which entities were required to be audited at full scope considering the relative significance of each entity to the Group and the overall coverage obtained over each material line item in the consolidated financial statements. A full scope audit was performed by us, or under our instructions, by other PwC network firms for entities covering substantially all revenues and assets.

REPORTING ON OTHER INFORMATION INCLUDING THE MANAGEMENT REPORT

The Management Board is responsible for the other information. The other information comprises the Introduction, the Management report, Consolidated Sustainability Statement, and Additional Information (but does not include the consolidated financial statements and our auditor's report thereon).

Our opinion on the consolidated financial statements does not cover the other information, including the Management report.

In connection with our audit of the consolidated financial statements, our responsibility is to read the other information identified above and, in doing so, consider whether the other information is materially inconsistent with the consolidated financial statements or our knowledge obtained in the audit, or otherwise appears to be materially misstated.

With respect to the Management report, excluding the requirements for the information on the sustainability reporting on which the separate assurance report on the sustainability reporting has been issued by us on 24 March 2025, we also performed the procedures required by the Auditors Activities Act of the Republic of Estonia. Those procedures include considering whether the Management report is consistent, in all material respects, with the consolidated financial statements and is prepared (excluding the Consolidated Sustainability Statement) in accordance with the requirements of the Accounting Act of the Republic of Estonia.

Based on the work undertaken in the course of our audit, in our opinion:

- the information given in the Management report for the financial year for which the consolidated financial statements are prepared is consistent, in all material respects, with the consolidated financial statements; and
- the Management report (excluding Consolidated Sustainability Statement) has been prepared in accordance with the requirements of the Accounting Act of the Republic of Estonia.

If, based on the work we have performed on the Management report and other information that we obtained prior to the date of this auditor's report, we conclude that there is a material misstatement in the Management report or in this other information, we are required to report that fact. We have nothing to report in this regard.

RESPONSIBILITIES OF THE MANAGEMENT BOARD AND THOSE CHARGED WITH GOVERNANCE FOR THE CONSOLIDATED FINANCIAL STATEMENTS

The Management Board is responsible for the preparation and fair presentation of the consolidated financial statements in accordance with International Financial Reporting Standards as adopted by the European Union, and for such internal control as the Management Board determines is necessary to enable the preparation of consolidated financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the consolidated financial statements, the Management Board is responsible for assessing the Group's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Management Board either intends to liquidate the Group or to cease operations, or has no realistic alternative but to do so.

Those charged with governance are responsible for overseeing the Group's financial reporting process.

AUDITOR'S RESPONSIBILITIES FOR THE AUDIT OF THE CONSOLIDATED FINANCIAL STATEMENTS

Our objectives are to obtain reasonable assurance about whether the consolidated financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (EE) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these consolidated financial statements.

As part of an audit in accordance with ISAs (EE), we exercise professional judgment and maintain professional scepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the consolidated financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Group's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the Management Board.
- Conclude on the appropriateness of the Management Board's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the consolidated financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Group to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the consolidated financial statements, including the disclosures, and whether the consolidated financial statements represent the underlying transactions and events in a manner that achieves fair presentation.
- Plan and perform the group audit to obtain sufficient appropriate audit evidence regarding the financial information of the entities or business units within the Group as a basis for forming an opinion on the consolidated financial statements. We are responsible for the direction, supervision and review of the audit work performed for the purpose of the group audit. We remain solely responsible for our audit opinion.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, actions taken to eliminate threats or safeguards applied.

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the consolidated financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

REPORT ON OTHER LEGAL AND REGULATORY REQUIREMENTS

Appointment and period of our audit engagement

We were first appointed as auditors of Luminor Bank AS on 31 May 2018 for the financial year ended 31 December 2018. Our appointment has been renewed by tenders in the intermediate years, representing the total period of our uninterrupted engagement appointment for Luminor Bank AS of 8 years. In accordance with the Auditors Activities Act of the Republic of Estonia and the Regulation (EU) No 537/2014, our appointment as the auditor of Luminor Bank AS can be extended for up to the financial year ending 31 December 2037.

On behalf of AS PricewaterhouseCoopers



Lauri Past

Certified auditor in charge, auditor's certificate no. 567

24 March 2026

Tallinn, Estonia

Aktsiaselts PricewaterhouseCoopers

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INDEPENDENT PRACTITIONER'S LIMITED ASSURANCE REPORT ON LUMINOR BANK AS CONSOLIDATED SUSTAINABILITY STATEMENT

To the shareholder of Luminor Bank AS

LIMITED ASSURANCE CONCLUSION

We have conducted a limited assurance engagement on the consolidated sustainability statement of AS Luminor Bank (the "Company"), included in part Consolidated Sustainability Statement of the Management report (the "Consolidated Sustainability Statement"), as at 31 December 2025 and for the year then ended.

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the Consolidated Sustainability Statement is not prepared, in all material respects, in accordance with Section 31, subsection 4 of the Accounting Act implementing Article 29(a) of EU Directive 2013/34/EU, including:

- compliance with the European Sustainability Reporting Standards (ESRS), including that the process carried out by the Company to identify the information reported in the Consolidated Sustainability Statement (the "Process") is in accordance with the description set out in note Identifying material matters and IROs; and
- compliance of the disclosures in note Disclosures pursuant to Article 8 of EU Taxonomy Regulation within the Environmental Information section and note 1. EU Taxonomy tables within Notes to the Sustainability Statement of the Consolidated Sustainability Statement with Article 8 of EU Regulation 2020/852 (the "Taxonomy Regulation").

BASIS FOR CONCLUSION

We conducted our limited assurance engagement in accordance with International Standard on Assurance Engagements (Estonia) 3000 (Revised), *Assurance engagements other than audits or reviews of historical financial information* ("ISAE (EE) 3000 (Revised)") as adopted by Auditing Activities Oversight Board.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion. Our responsibilities under this standard are further described in the Practitioner's responsibilities section of our report.

Our independence and quality management

We have complied with the independence and other ethical requirements of the Code of Ethics for Professional Accountants (Estonia) (including Independence Standards) (Code of Ethics (Estonia)) as adopted by Auditing Activities Oversight Board, which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

The firm applies International Standard on Quality Management (Estonia) 1 (revised), which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

RESPONSIBILITIES FOR THE CONSOLIDATED SUSTAINABILITY STATEMENT

Management Board of the Company is responsible for designing and implementing a process to identify the information reported in the Consolidated Sustainability Statement in accordance with the ESRS and for disclosing this Process in note Identifying material matters and IROs of the Consolidated Sustainability Statement. This responsibility includes:

- understanding the context in which the Group's activities and business relationships take place and developing an understanding of its affected stakeholders;
- the identification of the actual and potential impacts (both negative and positive) related to sustainability matters, as well as risks and opportunities that affect, or could reasonably be expected to affect, the Group's financial position, financial performance, cash flows, access to finance or cost of capital over the short-, medium-, or long-term;
- the assessment of the materiality of the identified impacts, risks and opportunities related to sustainability matters by selecting and applying appropriate thresholds; and
- making assumptions that are reasonable in the circumstances.

Management Board of the Company is further responsible for the preparation of the Consolidated Sustainability Statement, in accordance with Section 31, subsection 4 of the Accounting Act implementing Article 29(a) of EU Directive 2013/34/EU, including:

- compliance with the ESRS;
- preparing the disclosures in note Disclosures pursuant to Article 8 of EU Taxonomy Regulation within the Environmental Information section and note 1. EU Taxonomy tables within Notes to the Sustainability Statement of the Consolidated Sustainability Statement, in compliance with Article 8 of the Taxonomy Regulation;
- designing, implementing and maintaining such internal control that the Management Board determines is necessary to enable the preparation of the Consolidated Sustainability Statement that is free from material misstatement, whether due to fraud or error; and
- the selection and application of appropriate sustainability reporting methods and making assumptions and estimates that are reasonable in the circumstances.

Those charged with governance are responsible for overseeing the Group's sustainability reporting process.

Inherent limitations in preparing the Consolidated Sustainability Statement

Greenhouse gas emissions quantification is subject to inherent uncertainty because of incomplete scientific knowledge used to determine emissions factors and the values needed to combine emissions of different gases.

In reporting forward-looking information in accordance with the ESRS, the Management Board of the Company is required to prepare the forward-looking information on the basis of disclosed assumptions about events that may occur in the future and possible future actions by the Group. Actual outcomes are likely to be different since anticipated events frequently do not occur as expected.

PRACTITIONER'S RESPONSIBILITIES

Our responsibility is to plan and perform the assurance engagement to obtain limited assurance about whether the Consolidated Sustainability Statement is free from material misstatement, whether due to fraud or error, and to issue a limited assurance report that includes our conclusion. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence decisions of users taken on the basis of the Consolidated Sustainability Statement as a whole.

As part of a limited assurance engagement in accordance with ISAE (EE) 3000 (Revised) we exercise professional judgement and maintain professional scepticism throughout the engagement.

Our responsibilities in respect of the Consolidated Sustainability Statement, in relation to the Process, include:

- obtaining an understanding of the Process, but not for the purpose of providing a conclusion on the effectiveness of the Process, including the outcome of the Process;
- considering whether the information identified addresses the applicable disclosure requirements of the ESRS; and
- designing and performing procedures to evaluate whether the Process is consistent with the Company's description of its Process set out in note Identifying material matters and IROs.

Our other responsibilities in respect of the Consolidated Sustainability Statement include:

- identifying where material misstatements are likely to arise, whether due to fraud or error; and
- designing and performing procedures responsive to where material misstatements are likely to arise in the Consolidated Sustainability Statement. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

SUMMARY OF THE WORK PERFORMED

A limited assurance engagement involves performing procedures to obtain evidence about the Consolidated Sustainability Statement.

The procedures in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

The nature, timing and extent of procedures selected depend on professional judgement, including the identification of disclosures where material misstatements are likely to arise in the Consolidated Sustainability Statement, whether due to fraud or error.

In conducting our limited assurance engagement, with respect to the Process, we:

- obtained an understanding of the Process by:
 - performing inquiries to understand the sources of the information used by management (e.g., stakeholder engagement, business plans and strategy documents); and
 - reviewing the Company's internal documentation of its Process; and
- evaluated whether the evidence obtained from our procedures with respect to the Process implemented by the Company was consistent with the description of the Process set out in note Identifying material matters and IROs.

In conducting our limited assurance engagement, with respect to the Consolidated Sustainability Statement, we:

- obtained an understanding of the Group's reporting processes relevant to the preparation of its Consolidated Sustainability Statement by:
 - obtaining an understanding of the Group's control environment, processes and information system relevant to the preparation of the Consolidated Sustainability Statement, but not for the purpose of providing a conclusion on the effectiveness of the Group's internal control.
 - obtaining an understanding of the roles and responsibilities in the preparation of the Consolidated Sustainability Statement, including communication within the Group and between the Management Board and those charged with governance.
- evaluated whether the information identified by the Process is included in the Consolidated Sustainability Statement;
- evaluated whether the structure and the presentation of the Consolidated Sustainability Statement is in accordance with the ESRS;
- performed inquiries of relevant personnel and analytical procedures on selected information in the Consolidated Sustainability Statement;
- performed substantive assurance procedures on selected information in the Consolidated Sustainability Statement;
- where applicable, compared disclosures in the Consolidated Sustainability Statement with the corresponding disclosures in the consolidated financial statements and Management report;
- evaluated the methods, assumptions and data for developing estimates and forward-looking information;
- obtained an understanding of the Company's process to identify taxonomy-eligible and taxonomy-aligned economic activities and the corresponding disclosures in the Consolidated Sustainability Statement.

On behalf of AS PricewaterhouseCoopers



Janno Hermanson

Certified auditor in charge, auditor's certificate no. 570

24 March 2026

Tallinn, Estonia

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PROFIT ALLOCATION PROPOSAL

€m	2024	2025
Opening balance of retained earnings	327.5	235.7
Profit for the period	202.2	157.7
Distributions paid in the period	-	-5.5
Dividends paid in the period	-294.5	-101.1
Other	0.5	-0.1
Closing balance of retained earnings	235.7	286.7
Proposed dividends	-101.1	-74.0
Closing balance of retained earnings after payment of proposed dividends	134.6	214.7

SIGNATURES OF THE MANAGEMENT BOARD

The Management Board of Luminor Bank AS has approved the Annual Report for the year 2025. The Annual Report consists of the consolidated statement of profit or loss and other comprehensive income, consolidated statement of financial position, consolidated statement of changes in equity, consolidated statement of cash flows and notes to the consolidated financial statement, profit allocation proposal and independent auditor's report. The Supervisory Council of Luminor Bank AS has reviewed the Annual Report and has approved it for submission to the General Meeting of Shareholders.

24 March 2026



Wojciech Sass
Chair



Ossi Leikola



Diego Biondo



Mari Möis



Jonna Pechter



Johannes Proksch



Tanel Rebane



Jonas Urbonas



Enkelejd Zotaj

ADDITIONAL INFORMATION

Abbreviations, terms, and Alternative performance measures

Abbreviations

AC	Amortised cost
FVTOCI	Fair Value through Other Comprehensive Income
FVTPLD	Designated at Fair Value through Profit or Loss
FVTPLM	Measured mandatorily as Fair Value through Profit or Loss

Terms

Common Equity Tier 1 ratio	Shareholders' equity subject to regulatory adjustments as a percentage of total risk exposure amounts
Companies	Businesses, Financial institutions, and Public sector
Corporate Banking	Corporate Banking serves business customers with a dedicated relationship manager and all leasing customers who do not have a bank relationship
Distributions	Payment of interest on Additional Tier 1 capital instruments
Leverage ratio	Tier 1 capital as a percentage of total assets and off-balance sheet items subject to regulatory adjustments
Liquidity coverage ratio (LCR)	High-quality liquid assets as a percentage of the estimated net liquidity outflow over the next 30 calendar days
Net stable funding ratio (NSFR)	Available stable funding as a percentage of required stable funding over a one-year horizon
Other reserves	Consists chiefly of mandatory statutory reserve capital, calculated in accordance with the Estonian Commercial Code, which may be used to cover losses.
POCI loans	Loans which were credit impaired when purchased or originated
Profit attributable to Additional Tier 1 capital holders	The product of the coupon payable on the security and the number of days in issue in the year, divided by the number of days in the year.
Retail Banking	Retail Banking serves individuals and small businesses

Alternative performance measures

Average spread on Loans to customers	Interest margin on loans, annualised, as a percentage of average Loans to customers
Average spread on Deposits from customers	Interest margin on deposits, annualised, as a percentage of average Deposits from customers
Combined weighted total average spread, loans & deposits	Sum of Interest margin on loans and Interest margin on deposits, annualised, as a percentage of the sum of Average Loans to customers and Average Deposits from customers.
Common Equity Tier 1, including profit to be retained, ratio	The total of Shareholders' equity, subject to regulatory adjustments, and profit for the period to be retained, as a percentage of total risk exposure amounts ('Management view')
Cost/ income ratio	Total operating expenses as a percentage of total operating income
Cost of risk	Expected credit losses, annualised, as a percentage of average Loans to customers.
Net interest margin (NIM)	Net interest and similar income as a percentage of average interest earning assets
Non-performing loans ratio	Gross carrying amount of Stage 3 loans as a percentage of gross carrying amount of total loans
Return on Allocated Capital	Profit after tax as a percentage of capital allocated to segments on a risk-adjusted basis
Return on Equity	Profit for the period attributable to the shareholder, annualised, as a percentage of the average shareholder equity for that period.
Return on Equity, assuming a CET1 ratio of 15%	Profit for the period attributable to the shareholder (annualised), adjusted, as a percentage of the product of, the sum of the average of Total risk exposure amounts, multiplied by 15%, adjusted, for period

We describe these APMs, provide formulae, and calculations in 'Luminor Bank, Alternative Performance Measures, 4Q25'.

Information about Luminor Bank

Country of registration
Republic of Estonia

Commercial register code
11315936

Main activity
Credit institution

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Balance sheet date
31 December 2025

Reporting period
1 January to 31 December 2025

Reporting currency
euro

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Financial Calendar 2026

Date

7 May 2026

6 August 2026

5 November 2026

Report

Interim Report 1Q 2026

Interim Report 2Q 2026

Interim Report 3Q 2026

This report was designed and produced by Luminor Bank AS

Luminor

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