

SAVINGS BANKS AMALGAMATION'S PILLAR 3 DISCLOSURE ON REMUNERATION

31 DEC 2025

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INTRODUCTION

The Amalgamation comprises the Savings Banks' Union Coop (Säästöpankkiliitto osk; LEI code: 7437005892K69S3MW344), which acts as the Central Institution of the Amalgamation, 14 Savings Banks, the Central Bank of Savings Banks Finland Plc, Sp Mortgage Bank, Sp-Fund Management Company Ltd Plc as well the companies within the consolidation groups of the above-mentioned entities of which Savings Bank Services Ltd is 100% owned by Savings Banks' Union Coop.

This report discloses information on the remuneration of the Amalgamation as specified in the Capital Requirements Regulation of the European Parliament and of the Council No. 573/2013 (CRR) (Pillar III disclosures).

The report is unaudited.

EU REMA – REMUNERATION POLICY

Institutions shall describe the main elements of their remuneration policies and how they implement these policies. In particular, the following elements, where relevant, shall be described:

a) Information relating to the bodies that oversee remuneration

- **Name, composition and mandate of the main body (management body or remuneration committee as applicable) overseeing the remuneration policy and the number of meetings held by that main body during the financial year.**

The Central Institution's Board of Directors decides, on the proposal of the Remuneration Committee, on the remuneration principles of the Savings Banks Amalgamation. The Central Institution's Remuneration Committee monitors and controls the functioning and competitiveness of the remuneration systems of the member credit institutions and companies, ensuring their ability to support the short and long-term goals of the Amalgamation, and prepares proposals to the Board of Directors for the development of the remuneration system. The remuneration principles are reviewed and, if necessary, amended annually to ensure that they are up to date. They are also reviewed and amended whenever there are changes in the operating environment, the regulatory environment or the requirements imposed by the authorities.

In 2025, the Board of Directors of the Savings Banks' Union Coop consisted of the following members: Robin Lindahl (independent member), Heikki Paasonen, Pirkko Ahonen, Tuula Heikkinen (independent member), Eero Laesterä (independent member), Simo Leisti (independent member), Monika Mangs, Veli-Pekka Mattila, Petri Siviranta and Hannu Syvänen. The Board of Directors held nineteen (19) meetings in 2025.

The Remuneration Committee consists of a minimum of three members who are appointed by the Central Institution's Board of Directors from among its members. The Committee may also use various experts who may be invited to participate in committee meetings. The composition

and work of the Committee have been organised in such a way as to allow the committee to assess independently the incentives and other impacts of the remuneration systems on risk, capital and liquidity management.

In 2025, the Remuneration Committee consisted of the following independent members: Tuula Heikkinen, Simo Leisti and Robin Lindahl. The Committee held six (6) meetings.

- **External consultants whose advice has been sought, the body by which they were commissioned, and in which areas of the remuneration framework**

In 2025, the Remuneration Committee engaged external consultants EY and Fondia to support its work. EY and Fondia were commissioned to review compliance with regulatory requirements and to assist in updating the remuneration principles and related guidelines.

- **A description of the scope of the institution's remuneration policy (e.g. by regions, business lines), including the extent to which it is applicable to subsidiaries and branches located in third countries**

Remuneration within the Savings Banks Amalgamation is guided by a common set of remuneration principles. The Amalgamation does not operate a single, unified remuneration system; instead, each entity determines its own remuneration practices within the framework of the remuneration principles adopted by the Amalgamation.

- **A description of the staff or categories of staff whose professional activities have a material impact on institutions' risk profile (identified staff)**

The Savings Banks Group has identified significant risk-takers who can impact a bank's risk profile or through their actions cause considerable financial risk to a bank. The persons affecting the risk profile of the Amalgamation include the Managing Directors of member credit institutions, the Central Institution and other companies, other people participating in management

and decision-making and people associated with functions independent of business operations. Identified staff are subject to enhanced remuneration rules.

The remuneration of functions independent of business operations is controlled by the board of the member credit institution or member company or the Central Institution. Such variable parts of remuneration may not depend on the outcome of the business unit which they control but must be based on the achievement of the goals set for the control. This ensures that the objectivity or independence of the function is not jeopardised and conflicts of interest can be avoided.

The Savings Banks Amalgamation's remuneration system for personnel and management is based on current legislation, the regulations and recommendations governing the financial sector and, where applicable, the Finnish Corporate Governance Code.

The member credit institutions of the Savings Banks Amalgamation adhere to the provisions of Chapter 8 of the Act on Credit Institutions (610/2014) and the Savings Banks Amalgamation's remuneration principles. Remuneration also complies with EU and Finnish legislation and the orders and guidelines issued by the authorities.

b) Information relating to the design and structure of the remuneration system for identified staff

If an individual's variable remuneration exceeds EUR 50,000 per year or one third of their total annual pay, 60% of the variable remuneration must be deferred and will vest gradually over the deferral period. The Central Institution has up-to-date information about significant risk-takers. Each member institution is responsible for the accuracy and timeliness of its own information and reporting information to the Central Institution.

c) Description of the ways in which current and future risks are taken into account in the remuneration processes

Remuneration does not encourage risk-taking that would exceed the sustainable risk level defined on the basis of the risk-bearing capacity of the member credit institutions or the Savings Banks' Union Coop.

Current and future risks are taken into account in the remuneration processes by assessing risks both before and after remuneration is awarded. Performance metrics and targets are based on the institution's business strategy. Where necessary, variable remuneration is deferred

over several years, and the amount can be reduced or reclaimed if risks materialize or circumstances change. The Risk Management and Compliance functions are actively involved in the design and evaluation of remuneration practices.

d) The ratios between fixed and variable remuneration set in accordance with point (g) of Article 94(1) of Directive 2013/36/EU

The ratio between fixed and variable remuneration is determined in advance, and variable remuneration may not exceed 100 percent of the total fixed remuneration (200 percent with shareholder approval).

e) Description of the ways in which the institution seeks to link performance during a performance measurement period with levels of remuneration

The institution links performance and remuneration by ensuring that variable rewards (bonuses, incentives) are directly tied to the achievement of individual, team, and organizational goals during the performance measurement period. Performance is assessed using both quantitative and qualitative criteria aligned with the institution's strategy, values, and risk appetite. After the performance period, the results are evaluated against these targets, and variable remuneration is awarded accordingly. Additionally, mechanisms such as deferral and risk adjustment ensure that rewards reflect not only short-term results but also long-term, sustainable performance and responsible risk-taking.

f) Description of the ways in which the institution seeks to adjust remuneration to take account of long-term performance.

The institution adjusts remuneration to reflect long-term performance by deferring variable remuneration above defined thresholds, reassessing risks before deferred amounts are paid (malus and clawback), and aligning performance metrics with the institution's long-term strategy. The remuneration framework is reviewed annually to ensure it continues to support sustainable performance and regulatory compliance.

These mechanisms ensure that remuneration is not only linked to short-term achievements but also adjusted to reflect sustainable, responsible long-term performance and risk outcomes.

g) The description of the main parameters and rationale for any variable components scheme and any other non-cash benefit in accordance with point (f) of Article 450(1) CRR

Remuneration within the Savings Banks Amalgamation is guided by a common set of remuneration principles. The Amalgamation does not operate a single, unified remuneration system; instead, each entity determines its own remuneration practices within the framework of the remuneration principles adopted by the Amalgamation.

In accordance with the remuneration principles of the Savings Banks Amalgamation, the remuneration systems of each entity must ensure an appropriate balance between fixed and variable remuneration.

Variable remuneration includes performance-based bonuses and other performance-related rewards whose amount may vary, and which may be linked, for example, to business results, as well as retention awards that may be used in situations such as restructurings or business winddowns. Variable remuneration also includes severance payments that may be made upon early termination of employment, and guaranteed variable remuneration, which may be granted only when hiring a new employee and is considered exceptional.

Supplementary pension benefits are classified as either fixed or variable depending on whether they meet the criteria for fixed remuneration.

h) Upon demand from the relevant Member State or competent authority, the total remuneration for each member of the management body or senior management

- N/A, because disclosure of the information has not been demanded.

i) Information on whether the institution benefits from a derogation laid down in Article 94(3) CRD in accordance with point (k) of Article 450(1) CRR

The Savings Banks Amalgamation applies the derogation set out in point (b) of Article 94(3) of the CRD. The Amalgamation applies this derogation to those identified staff members for whom exercising the derogation is permitted under Article 94(3)(b) CRD. The derogation provided under Article 94(3)(a) CRD does not apply to the Amalgamation.

j) Large institutions shall disclose the quantitative information on the remuneration of their collective management body, differentiating between executive and non-executive members in accordance with Article 450(2) CRR

N/A, because the Savings Banks Amalgamation is not a large institution.

EU REM1 – REMUNERATION AWARDED FOR THE FINANCIAL YEAR

31 Dec 2025 (EUR 1,000)			a	b	c	d
			MB Supervisory function	MB Management function	Other senior management	Other identified staff
1		Number of identified staff	13	10	8	93
2	Fixed remuneration	Total fixed remuneration	89	1,519	1,317	10,195
3		Of which: cash-based	89	1,519	1,317	10,195
9		Number of identified staff	13	10	8	93
10	Variable remuneration	Total variable remuneration	0	166	318	1,457
11		Of which: cash-based	0	166	318	1,457
17	Total remuneration (2 + 10)		89	1,684	1,635	11,652

EU REM5 – INFORMATION OF STAFF WHOSE PROFESSIONAL ACTIVITIES HAVE A MATERIAL IMPACT ON INSTITUTIONS’ RISK PROFILE (IDENTIFIED STAFF)

		a	b	c	d	a	b	c	d
		Management body remuneration			Business areas				
31 Dec 2025 (EUR 1,000)		MB Supervisory function	MB Management function	Total MB	Retail banking	Asset management	Corporate functions	Independent internal control functions	Total
1	Total number of identified staff	13	10	23	74	1	6	21	125
2	Of which: members of the MB	13	10	23					
3	Of which: other senior management				2	1	6	1	
4	Of which: other identified staff				72	0		20	
5	Total remuneration of identified staff	89	1,684	1,773	9,787	258	1,262	1,836	14,918
6	Of which: variable remuneration	89	166	255	1,216	50	283	210	2,014
7	Of which: fixed remuneration		1,519	1,519	8,571	208	979	1,626	12,903

INFORMATION NOT DISCLOSED BY THE SAVINGS BANKS AMALGAMATION

Table EU REM2 is not disclosed because no special payments have been paid to identified staff. Table EU REM3 is not disclosed because no deferred remuneration exists. Table EU REM4 is not disclosed because remuneration to staff does not exceed the threshold (EUR 1 million).

DECLARATION APPROVED BY THE BOARD OF DIRECTORS OF THE SAVINGS BANKS AMALGAMATION

The Board of the Amalgamation confirms, in accordance with CRR Article 431(3), that Savings Banks Amalgamation's Pillar 3 Disclosure on Remuneration has been prepared in accordance with the Amalgamation's Pillar III disclosure principles, internal processes, systems and controls.

In Helsinki, 11 March 2026

The Board of Directors of the Savings Banks' Union Coop

Robin Lindahl
Chairman of the Board

Heikki Paasonen
Vice Chairman of the Board

Pirkko Ahonen

Monica Mangs

Petri Siviranta

Tuula Heikkinen

Eero Laesterä

Hannu Syvänen

Simo Leisti

Veli-Pekka Mattila



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