

SAVINGS BANKS AMALGAMATION'S PILLAR 3 DISCLOSURE REPORT

31 DEC 2025

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SAVINGS BANKS AMALGAMATION'S PILLAR 3 DISCLOSURE REPORT

31 DEC 2025

INTRODUCTION

The Savings Banks Amalgamation comprises the Savings Banks' Union Coop, which acts as the Central Institution of the Amalgamation, 14 Savings Banks, Central Bank of Savings Banks Finland Plc, Sp Mortgage Bank Plc and the companies within the consolidation groups of the above-mentioned entities, Savings Bank Services Ltd as well as Sp-Fund Management Company Ltd. The member organisations of the Savings Banks Amalgamation form a financial entity as defined in the Act on the Amalgamation of Deposit Banks, in which Savings Banks' Union Coop and its member credit institutions are ultimately jointly and severally liable for each other's liabilities and commitments. The Amalgamation is a central part of the Savings Bank Group, which is the most long-standing banking group in Finland. Further information about the structure of the Savings Banks Group can be found at www.saastopankki.fi/en/savingsbanksgroup.

This report discloses information on the risk management, governance, capital adequacy calculation, leverage ratio, asset encumbrance, liquidity coverage ratio, net stable funding ratio, forborne exposures, non-performing exposures and minimum requirement for own funds and eligible liabilities (MREL) of the Savings Banks Amalgamation as specified in the Capital Requirements Regulation of the European Parliament and of the Council No. 573/2013 (CRR) (Pillar III disclosures). Information on remuneration is disclosed in a separate report. The report is unaudited.

The comprehensive Pillar III report is disclosed at year-end in conjunction with the Savings Banks Group's board of directors' report and IFRS financial statements and the key metrics are disclosed semi-annually in conjunction with the Savings Banks Group's half year report. Pillar III information is published on the Savings Banks Group's websites. As from 2026, Pillar III information is also available in the EBA's Pillar 3 data hub.

LEI code of the Savings Banks' Union Coop is 7437005892K69S3MW344.

1. DECLARATION APPROVED BY THE BOARD OF DIRECTORS OF THE SAVINGS BANK AMALGAMATION

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

BOARD DECLARATION ON THE ADEQUACY OF RISK MANAGEMENT ARRANGEMENTS (CRR 435 (1))

The Board of Directors approves the framework for risk appetite by setting risk limits and other thresholds for different risk areas at the Amalgamation level. The risk positions are regularly reported to the Board of Directors of the Central Institution. The sufficiency of the risk appetite framework is regularly reassessed by the Board of Directors. The Board of Directors assesses that the Amalgamation has adequate risk management arrangements in place with regards to the Amalgamation's risk profile and strategy.

RISK PROFILE OF THE SAVINGS BANKS AMALGAMATION (CRR 435 (1))

The basic objective of the Savings Banks is to promote thrift and the financial well-being of their customers and to operate near their customers. The Amalgamation focuses on retail banking, particularly daily banking, saving and investments, and lending services. The key customer groups for the Banking segment are private customers, corporate (small to medium) customers, and forestry and agricultural customers. The most significant risks are credit, interest rate and liquidity risks. In addition, the Amalgamation is affected by market risk, operational risk and other qualitative risks such as business risks.

The Board of Directors of the Central Institution steers credit risk management by approving the credit risk strategy and other guidelines and by setting risk limits and other thresholds. Credit risk is assessed and measured by monitoring e.g. delays in repayment, expected credit losses, forborne exposures, doubtful receivables and non-performing loans. The concentrations of the credit

portfolio are monitored by customer and by industry. The Savings Banks Group does not have any customers with exposures exceeding the 10% threshold of the Amalgamation's own funds.

The most important market risk in banking activities is the interest rate risk in the banking book, which is measured through both net present value and net interest income. The appetite for interest rate risk is described by the interest rate risk limits set by the Board of Directors of the Central Institution.

The Amalgamation's market risk appetite is defined in the market risk strategy, which is approved by the Board of Directors of the Central Institution. The strategy sets out market risk limits as well as any additional monitoring thresholds. The market risk in the investment portfolio is measured and followed by the investment class, counterparty and sector. The member credit institutions of the Amalgamation do not, as a rule, engage in trading for their own or their customers' account. The use of derivatives is limited to hedging purposes.

Liquidity risk management is governed by the Amalgamation's liquidity risk framework within which the risk appetite for liquidity risk is defined. The liquidity risk strategy is aligned with the Savings Banks Group's overall strategy as well as the Amalgamation's business plan. Member institutions within the Amalgamation are not permitted to undertake lending, investment or other activities that would give rise to risks capable of materially affecting the combined solvency or liquidity position of the Amalgamation or the member institution itself.

Liquidity risk is managed by ensuring that the Amalgamation's funding is sourced from stable funding channels, including retail deposits and wholesale market funding with appropriate maturities. Liquidity risk is measured and monitored at the Amalgamation level using a range of key metrics, including the cash position, the size of the liquidity buffer – assessed through stress testing – the Liquidity Coverage Ratio (LCR) and the Net Stable Funding Ratio (NSFR) which address short-term liquidity risks and long-term structural funding risks respectively. The liquidity risk framework incorporates limit structures for regulatory requirements (LCR and NSFR) but also includes internal limits for addressing the size and maturity diversification of wholesale

funding. These limits are defined across different time horizons, with separate constraints. As liquidity requirements are not applied on an individual basis to entities within the Amalgamation, the Amalgamation structure establishes specific liquidity risk management requirements which are reflected in the setting of internal liquidity limits for individual member entities.

Operational risks are managed in all the entities of Amalgamation according to the principles of operational risk management approved by the Board of Directors of the Amalgamation's Central Institution. These principles determine the main operational risk controls and risk management

methods, which are used in the evaluation of risks, monitoring of materialised risks and preparation for possible upcoming risks.

The Board of Directors of the Central Institution has, as part of Internal Capital Adequacy Assessment Process (ICAAP), reaffirmed the target CET1 capital ratio of 17%. At the end of 2025, the CET1 capital ratio of the Savings Banks Amalgamation was 22.7% (20.9%) and the capital ratio was 22.7% (20.9%).

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

2. GENERAL PRINCIPLES AND OBJECTIVES FOR RISK MANAGEMENT

EU OVA – Institution risk management approach

a) The concise risk statement approved by the management body in the application of point (f) of Article 435(1) CRR

Further details are set out in the Declaration approved by the Board of Directors of the Savings Banks Amalgamation.

b) Information on the risk governance structure for each type of risk

Risk management is defined as the identification, assessment, quantification, limitation and monitoring of risks caused by business operations and closely related risks. The purpose of risk management is to minimise the likelihood of unforeseeable losses or reputational risk in order to ensure the implementation of the Group's strategy.

The Savings Banks' Union Coop acts as the Central Institution of the Savings Banks Amalgamation. The Central Institution is responsible for risk and capital adequacy management and the adequacy and maintenance of the risk management framework at the Savings Banks Amalgamation level. The Amalgamation's risk appetite is defined in the group strategy approved by the Board of the Central Institution and is further specified in the risk-specific strategies. The realisation of the risk strategy is monitored through the monitoring and reporting of risk limits and monitoring thresholds, carried out independently of business operations.

The member institutions are responsible for the risk management framework and the risk and capital adequacy management within their own organisations in relation to the nature, scale and complexity of their business. Each Savings Bank takes risks within its own funds, capital adequacy and liquidity and operates within its own risk-bearing capacity. The basis for risk management within the Savings Banks Amalgamation is that a member institution does not take any such significant risks in its operations that it would jeopardise the liquidity and/or the

capital adequacy of the member institution. When each member institution operates within its risk-bearing capacity and ensures its liquidity and capital adequacy even during less favourable economic conditions, the liquidity and capital adequacy of the Savings Banks Amalgamation are also ensured. The Board of Directors of the member institution defines the risk appetite by approving the risk area-specific risk strategies, risk limits and other thresholds.

The task of the **Risk Committee** is to assist the Board of Directors of the Central Institution in matters concerning risk strategies and risk-taking and to monitor that the Savings Banks Amalgamation complies with the risk strategies approved by the Board of Directors of the Central Institution. The Risk Committee monitors and ensures the effectiveness and adequacy of the capital adequacy management process within the Savings Banks Amalgamation and evaluates the adequacy of the policies, controls and processes related to these risks. The Risk Committee meets monthly.

The task of the **Asset and Liability Committee** is to assist the Board of Directors and the Risk Committee in their areas of responsibility and ensure that the structural liquidity and market risk, including interest rate and investment risk, of the Savings Banks Amalgamation remain at a level that ensures the continuity of the Savings Banks Amalgamation's operations. In addition, the Asset and Liability Committee plans and coordinates the funding and liquidity management of the Savings Banks Amalgamation together with the Central Bank of Savings Banks' Treasury.

The Central Institution has established the following functions, independent of business operations, to ensure an effective and comprehensive internal control system for all member organisations of the Savings Banks Amalgamation:

- Risk Control
- Compliance function
- Internal audit

The task of the **Risk Control** unit is to ensure and monitor that the risk management framework of the Savings Banks Amalgamation is adequate in relation to the nature, scale, complexity and risk level of the Savings Banks Amalgamation's business operations. The Risk Control function assists the Board of Directors and senior management of the Savings Banks Amalgamation in organising an adequate risk management framework and monitoring the functionality and effectiveness of this framework. The Savings Banks Amalgamation's Risk Control function maintains and develops methods for managing risks within the Central Institution. This ensures that all, even new, fundamental but previously unidentified risks are covered by the risk management process of the Amalgamation's business lines.

The Risk Control unit reports regularly to the Board of Directors of the Central Institution and the boards of the banks/companies, the committees appointed by the Board of Directors of the Central Institution, and the executive management of the Central Institution on the risk-taking levels by risk area, significant changes in risk positions, and compliance with limits. It also provides an annual summary on the effectiveness of risk management, including any deficiencies and corrective actions, which the Board of Directors of the Central Institution uses to assess adequacy and take necessary measures.

The Compliance unit ensures that the Savings Banks Amalgamation complies with the applicable legislation and the regulations and guidelines issued by the authorities. The Compliance unit is also responsible for monitoring that the Savings Banks Amalgamation complies with internal guidelines, the ethical guidelines issued to the personnel and other guidelines applied in financial markets.

The internal audit of the Central Institution verifies, through its independent activity, that the Board of Directors of the Central Institution and its Audit Committee have access to a correct and comprehensive view of the profitability, efficiency, state of internal control and various operational risks of the Savings Banks Group and the Savings Banks Amalgamation. The chart below illustrates the risk management organisation of the Central Institution.

The Boards of Directors of the Savings Banks Amalgamation's member organisations are responsible for arranging the internal control framework within their own organisations in accordance with legislation, government regulations and the guidelines of the Board of Directors of the Central Institution. The CEOs together with the other senior management of the member organisations are responsible for arranging internal controls for their own organisation in accordance with legislation, government regulations and the internal guidelines of their respective Boards of Directors and the Board of Directors of the Central Institution.



Chart: Risk management governance of the Central Institution

3. CAPITAL ADEQUACY MANAGEMENT

EU OVC – ICAAP information

a) Approach to assessing the adequacy of the internal capital

The objective of the capital adequacy management process is to ensure that the quantity and quality of capital are adequate and in proportion with the nature, scale and complexity of the Savings Banks Amalgamation's operations and with all the risks arising from its business operations and operating environment. To achieve this objective, the Savings Banks Amalgamation identifies and assesses the risks associated with its business operations and ensures that its risk-bearing capacity is adequate when compared to the sum of all risks. The Savings Banks Amalgamation's risk strategy defines the objectives for risk-bearing capacity and risk appetite, together with other risk management objectives in relation to the business objectives.

The internal capital requirements specified through the capital adequacy management process are based on the capital requirements under Pillar I and risks outside Pillar I, such as the interest rate risk of the banking book, the market risk of the investment portfolio and business risk. During the internal assessment process, the Savings Banks Amalgamation estimates the amount of capital needed to cover any unforeseen losses resulting from risks outside Pillar I. The capital needs of the various risk areas and business lines are determined in a reliable and independent manner and capital is allocated systematically. This is done on the basis of current and planned risk-taking, taking into account the requirements of appropriate liquidity management.

The Board of Directors of the Central Institution has overall responsibility for the management of the Savings Banks Amalgamation's capital adequacy. The Board of Directors of the Central Institution approves the basis, objectives and principles of the Savings Banks Amalgamation's capital adequacy management. The Board of Directors also confirms the overall requirements for the measurement and assessment of capital adequacy and the overall principles for the management process of capital adequacy. In practice, this means that the Board of Directors approves the risk strategies and defines target levels for the capital needed to cover all material risks caused by the Savings Banks Amalgamation's business operations and changes in

the operating environment. The capital adequacy, liquidity and customer risks of the entities belonging to the Savings Banks Amalgamation are monitored on a consolidated basis at the Amalgamation level.

The Board of Directors of the Central Institution has set a threshold for the capital ratio that is monitored on a quarterly basis. The long-term minimum requirement for CET1 capital is 17%.

The Savings Banks Amalgamation uses stress tests to assess its own risk position and the adequacy of its capital. The purpose of the stress tests is to estimate how various exceptionally serious but possible situations may affect profitability, capital adequacy and the adequacy of own funds. The stress tests are designed to identify the key risks to the Savings Banks Amalgamation and assess the vulnerability of its structure to the realisation of the risks in question. The objective of the capital adequacy management process is also to maintain and develop the quality of the risk management framework.

The Savings Banks Amalgamation's capital contingency plan has been drawn up in order to be prepared for unforeseeable events that may jeopardise the Amalgamation's capital adequacy. The capital contingency plan includes target and follow-up levels set by the Board of Directors for the quantity and quality of the capital, which are monitored and controlled on a quarterly basis. The capital contingency plan describes the measures that the executive management and the Board can take if the threshold set for the solvency ratio is breached.

b) Upon demand from the relevant competent authority, the result of the institution's internal capital adequacy assessment process

This disclosure requirement is not applicable.

EU KM1 – KEY METRICS TEMPLATE

(EUR 1,000)		a	c	e
		31 Dec 2025	30 Jun 2025	31 Dec 2024
Available own funds (amounts)				
1	Common Equity Tier 1 (CET1) capital	1,254,434	1,187,710	1,146,126
2	Tier 1 capital	1,254,434	1,187,710	1,146,126
3	Total capital	1,256,179	1,189,774	1,148,505
Risk-weighted exposure amounts				
4	Total risk exposure amount	5,531,347	5,477,183	5,494,792
4a	Total risk exposure pre-floor	5,531,347	5,477,183	5,494,792
Capital ratios (as a percentage of risk-weighted exposure amount)				
5	Common Equity Tier 1 ratio (%)	22.68%	21.68%	20.86%
5b	Common Equity Tier 1 ratio considering unfloored TREA (%)	22.68%	21.68%	20.86%
6	Tier 1 ratio (%)	22.68%	21.68%	20.86%
6b	Tier 1 ratio considering unfloored TREA (%)	22.68%	21.68%	20.86%
7	Total capital ratio (%)	22.71%	21.72%	20.90%
7b	Total capital ratio considering unfloored TREA (%)	22.71%	21.72%	20.90%
Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)				
EU 7d	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	1.50%	1.50%	1.50%
EU 7e	of which: to be made up of CET1 capital (percentage points)	0.84%	0.84%	0.84%
EU 7f	of which: to be made up of Tier 1 capital (percentage points)	1.13%	1.13%	1.13%
EU 7g	Total SREP own funds requirements (%)	9.50%	9.50%	9.50%
Combined buffer and overall capital requirement (as a percentage of risk-weighted exposure amount)				
8	Capital conservation buffer (%)	2.5%	2.50%	2.50%
EU 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	0.00%	0.00%	0.00%
9	Institution specific countercyclical capital buffer (%)	0.02%	0.05%	0.05%
EU 9a	Systemic risk buffer (%)	1.00%	1.00%	1.00%
10	Global Systemically Important Institution buffer (%)	0.00%	0.00%	0.00%
EU 10a	Other Systemically Important Institution buffer (%)	0.00%	0.00%	0.00%
11	Combined buffer requirement (%)	3.52%	3.55%	3.55%
EU 11a	Overall capital requirements (%)	13.02%	13.05%	13.05%
12	CET1 available after meeting the total SREP own funds requirements (%)	13.21%	11.40%	10.99%

EU KM1 – KEY METRICS TEMPLATE

(EUR 1,000)		a	c	e
		31 Dec 2025	30 Jun 2025	31 Dec 2024
	Leverage ratio			
13	Total exposure measure	13,380,826	12,883,839	13,027,741
14	Leverage ratio (%)	9.37%	8.90%	8.39%
	Additional own funds requirements to address the risk of excessive leverage (as a percentage of total exposure measure)			
EU 14a	Additional own funds requirements to address the risk of excessive leverage (%)	0.00%	0.00%	0.00%
EU 14b	of which: to be made up of CET1 capital (percentage points)	0.00%	0.00%	0.00%
EU 14c	Total SREP leverage ratio requirements (%)	3.00%	3.00%	3.00%
	Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)			
EU 14d	Leverage ratio buffer requirement (%)	0.00%	0.00%	0.00%
EU 14e	Overall leverage ratio requirement (%)	3.00%	3.00%	3.00%
	Liquidity Coverage Ratio*			
15	Total high-quality liquid assets (HQLA) (Weighted value -average)	1,814,081	1,889,560	1,990,917
EU 16a	Cash outflows – Total weighted value	878,378	903,416	873,038
EU 16b	Cash inflows – Total weighted value	67,651	72,133	120,782
16	Total net cash outflows (adjusted value)	810,727	831,283	752,256
17	Liquidity coverage ratio (%)	225.69%	230.41%	297.04%
	Net Stable Funding Ratio			
18	Total available stable funding	10,979,364	10,859,927	10,644,731
19	Total required stable funding	8,877,924	8,739,519	8,496,822
20	NSFR ratio (%)	123.67%	124.26%	125.28%

At the end 2025, total own funds were EUR 1,256.2 (1,148.5) million, of which CET1 capital accounted for EUR 1,254.4 (1,146.1) million. The Savings Banks Amalgamation does not have additional Tier 1 capital. Tier 2 (T2) capital amounted to EUR 1.7 (2.4) million, consisting of debentures during the review period. Total risk exposure amount amounted to EUR 5,531.3 (5,494.8) million, an increase of 0.7% compared to the end of the previous year. The capital ratio of the Savings Banks Amalgamation was 22.7% (20.9%), and the CET1 capital ratio was 22.7% (20.9%). During the review period the own funds were strengthened mainly by the profit for the period. In addition, the amendments to the EU's Capital Requirements Regulation (CRR3) that entered into force at the beginning of 2025 increased the capital ratio of the Savings Banks Amalgamation slightly. Leverage ratio increased also from 8.9% to 9.4% due to increase in Tier 1 capital.

The capital requirement of the Savings Banks Amalgamation is 13.0% of the total risk exposure. The capital requirement of the Savings Banks Amalgamation consists of the 8% minimum capital requirement laid down in the Capital Requirements Regulation, the Pillar II requirement of 1.5% set by the Financial Supervisory Authority, the fixed additional capital requirement of 2.5% under the Act on Credit Institutions, the systemic risk buffer requirement of 1.0% and the country-specific countercyclical capital requirements of foreign exposures.

In 2025, the Financial Supervisory Authority did not impose a countercyclical capital buffer requirement, which may range from 0 to 2.5% of the total risk-weighted exposure amount. The Financial Supervisory Authority has not set additional capital requirements, so called O-SII buffers, for the Savings Banks Amalgamation.

EU OV1 – Overview of total risk exposure amounts

The standard method is used to calculate the capital requirement for the credit and counterparty risk of the Savings Banks Amalgamation, while the capital requirement for the operational risk is calculated using the basic method. The capital requirement for the credit valuation adjustment (CVA) is calculated using the standardised method. The capital requirement relating to market risk is calculated using the basic method for the foreign exchange exposure if the total net foreign exchange position is over two per cent of the aggregate amount of own funds.

The Financial Supervisory Authority has granted permission not to deduct internal holdings of credit institutions included in the Savings Banks Amalgamation from own funds instruments when calculating own funds at the individual institution level and sub-consolidation group level. In addition, the Financial Supervisory Authority has granted permission to apply a 0 per cent risk weight to internal credit institution liabilities included within the scope of the Savings Banks Amalgamation's joint and several liability. These permissions are based on the European Union Capital Requirements Regulation (EU 575/2013) and the Act on the Amalgamation of Deposit Banks (599/2010).

EU OV1 – OVERVIEW OF TOTAL RISK EXPOSURE AMOUNTS

		Total risk exposure amounts (TREA)		Total own funds requirements
		a	b	c
(EUR 1,000)		31 Dec 2025	31 Dec 2024	31 Dec 2025
1	Credit risk (excluding CCR)	4,877,269	4,775,823	390,181
2	Of which the standardised approach	4,877,269	4,775,823	390,181
6	Counterparty credit risk – CCR	6,040	7,099	483
7	Of which standardised approach	5,770	6,961	462
EU 8a	Of which exposures to a CCP	270	138	22
10	Credit valuation adjustments risk – CVA risk	15,916	31,231	390,665
EU 10b	Of which the basic approach (F-BA and R-BA)	15,916		1,273
24	Operational risk	632,122	680,640	50,570
25	Amounts below the thresholds for deduction (subject to 250% risk weight)	19,904	24,129	1,592
29	Total	5,531,347	5,494,792	831,899

The columns 3–5, 8, 9, EU 10a, EU 10c–23, EU 24a, 26–28 are not disclosed as there is no figures in these rows. Previous period's figures have been amended since their initial disclosure.

4. CREDIT RISK

4.1. CREDIT RISK MANAGEMENT

EU CRA – General qualitative information about credit risk

a) In the concise risk statement in accordance with point (f) of Article 435(1) CRR, how the business model translates into the components of the institution's credit risk profile.

Please see Chapter 1 of the Declaration approved by the Board of Directors of the Savings Banks Amalgamation, the section entitled "Risk profile of the Savings Banks Amalgamation".

b) When discussing their strategies and processes to manage credit risk and the policies for hedging and mitigating that risk in accordance with points (a) and (d) of Article 435(1) CRR, the criteria and approach used for defining the credit risk management policy and for setting credit risk limits.

The Board of Directors of the Central Institution steers the Banking segment's credit risk management, the methods used, as well as their monitoring and reporting by approving the credit risk strategy, other guidelines and by setting risk limits and other thresholds. The Central Institution's Risk Control function regularly monitors the development of credit risks in relation to limits as well as monitoring and control boundaries and monitors that the member credit institutions adhere to these principles.

The Risk Control unit of the Central Institution is responsible for maintaining and updating the approved credit risk strategy in cooperation with the Risk Committee established by the Central Institution's Board of Directors. The strategy is updated at least annually or whenever the Savings Banks Amalgamation's operating environment, business model and/or regulatory framework change materially.

The credit risk strategy is complemented by operational-level instructions and guidelines issued by the Central Institution's Board of Directors. The most important instructions are the credit underwriting policy, guidelines for the recognition and management of problem

customers, collection guidelines, guidelines for collateral price follow-up for real estate and commercial estate and general credit guidelines that also cover mortgage credit banking.

The objective of credit risk management is to mitigate the impact of the risks arising from the exposures on profitability and capital adequacy to an acceptable level. The Board of Directors of the Central Institution defines and confirms the risk limits and thresholds used for monitoring and controlling the lending portfolio by customer and industry group as well as the quality of the portfolio at the Savings Banks Amalgamation level.

The business plans and credit underwriting policies approved by the Boards of Directors of the Savings Banks Amalgamation's member institutions define the maximum exposure limits for the member credit institution-specific risk concentrations and steer lending by customer groups, industries and credit ratings. The member institutions mainly grant credit within their operational areas, ensuring one of the essential features of Savings Bank lending: local and comprehensive knowledge of the customers.

The Boards of Directors of the Savings Banks have granted credit authorisations to the bank's management/management team/credit committee and other designated employees. Credit decisions are made according to the credit underwriting policy as approved by the Board of Directors. The main principle is decision-making by two persons with lending authorisation. Credit decisions are based on the customers' creditworthiness and ability to pay, and other criteria, for example regarding acceptable collateral, are applied to credit decisions. Loans are mainly granted with acceptable collateral. Collateral is conservatively valued at fair value, and the fair value of collateral is regularly monitored using both statistical information and the bank's comprehensive knowledge about its operating area. The Board of Directors approves the instructions and guidelines for the valuation of different collateral types and their collateral value applied in lending. Collateral values are conservatively defined maximum amounts for each collateral type, and the evaluation of the fair value of collateral is always carried out on a case-by-case basis.

Credit risk is assessed and measured by monitoring payment delays, expected credit losses, forborne exposures, troubled exposures and non-performing receivables, for example. The customer-specific amounts of liabilities and collateral are monitored by the persons responsible for the customers, based on continuous payment behaviour and monitoring the customers' activities. The Board of Directors receives regular reports, produced by the Risk Control function, on customer liabilities, payment delays, expected credit losses, forborne exposures and non-performing receivables. The concentrations of the credit portfolio are monitored on a customer- and industry-specific basis, and the reporting includes the amounts and development of risks at the customer- and industry-levels as well as by credit rating.

c) When informing on the structure and organisation of the risk management function in accordance with point (b) of Article 435(1) CRR, the structure and organisation of the credit risk management and control function.

See EU CRA – General qualitative information about credit risk, section b).

d) When informing on the authority, status and other arrangements for the risk management function in accordance with point (b) of Article 435(1) CRR, the relationships between credit risk management, risk control, compliance and internal audit functions.

The Savings Banks Amalgamation follows the principle of three lines of defence with respect to risk management and compliance. The Risk Management, Risk Control and Compliance functions constitute the second line of defence, whereas Internal Audit constitutes the third line of defence. See also EU CRA – General qualitative information about credit risk, section b).

4.2. CREDIT QUALITY

EU CR1: PERFORMING AND NON-PERFORMING EXPOSURES AND RELATED PROVISIONS.

		a	b	c	d	e	f	g	h	i	j	k	l	m	n		o
		Gross carrying amount/nominal amount							Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off	Collateral and financial guarantees received	
		Performing exposures			Non-performing exposures				Performing exposures – accumulated impairment and provisions			Non-performing exposures – accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions				On performing exposures	On non-performing exposures
		Of which stage 1		Of which stage 2	Of which stage 2		Of which stage 3	Of which stage 1		Of which stage 2	Of which stage 2		Of which stage 3				
31 Dec 2025 (EUR 1,000)																	
005	Cash balances at central banks and other demand deposits	1,298,651	1,298,651														
010	Loans and advances	10,467,156	9,386,122	1,079,250	313,633	10,138	302,730	-17,264	-2,612	-14,652	-49,266	-223	-49,042	-5,502	10,054,582	254,998	
020	Central banks	74,488	74,488														
030	General governments	8,523	8,523					-6	-6						1,323		
040	Credit institutions	64,568	64,568					-3	-3								
050	Other financial corporations	17,521	16,479	42	8		8	-13	-11	-1					15,836	7	
060	Non-financial corporations	2,819,874	2,401,027	418,063	87,065	3,949	83,101	-10,039	-1,466	-8,574	-15,621	-91	-15,530	-2,212	2,766,170	69,435	
070	Of which SMEs	2,766,755	2,352,324	414,430	87,065	3,949	83,101	-9,967	-1,417	-8,550	-15,621	-91	-15,530	-2,212	2,717,251	69,435	
080	Households	7,482,181	6,821,037	661,144	226,560	6,189	219,621	-7,203	-1,126	-6,077	-33,645	-133	-33,512	-3,291	7,271,252	185,556	
090	Debt securities	924,724	917,999	2,043	911		911	-1,305	-1,103	-202	-911		-911		211,142		
100	Central banks																
110	General governments	413,054	412,487					-263	-263						9,579		
120	Credit institutions	297,587	297,587					-149	-149						140,493		
130	Other financial corporations	7,502	7,502					-2	-2						3,471		
140	Non-financial corporations	206,582	200,423	2,043	911		911	-890	-688	-202	-911		-911		57,599		
150	Off-balance-sheet exposures	749,301	723,885	25,417	4,280	130	4,076	768	512	257	286	1	284		385,122	2,674	
160	Central banks																
170	General governments	4,845	4,845					1	1						700		
180	Credit institutions	2,152	2,152					15	15								
190	Other financial corporations	4,453	4,417	36				2	1						747		
200	Non-financial corporations	333,760	318,130	15,630	2,510	114	2,322	533	390	143	75	1	74		285,756	1,968	
210	Households	404,090	394,340	9,751	1,770	16	1,754	218	104	114	211		211		97,919	707	
220	Total	13,439,832	12,326,656	1,106,710	318,823	10,267	307,717	-19,337	-4,227	-15,110	-50,462	-225	-50,237	-5,502	10,650,846	257,673	

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
		Gross carrying amount/nominal amount					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Collateral and financial guarantees received			
		Performing exposures		Non-performing exposures			Performing exposures – accumulated impairment and provisions		Non-performing exposures – accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions			Accumulated partial write-off	On performing exposures	On non-performing exposures		
		Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3	Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3					
31 Dec 2024 (EUR 1,000)																
005	Cash balances at central banks and other demand deposits	1,486,582	1,486,582					-3	-3							
010	Loans and advances	10,071,351	8,633,445	1,437,906	282,783	4,478	277,717	-21,107	-5,944	-15,164	-43,040	-136	-42,902	-5,117	9,617,186	223,419
020	Central banks	69,919	69,919													
030	General governments	8,925	8,925					-11	-11						1,143	
040	Credit institutions	74,449	74,449					-397	-397							
050	Other financial corporations	41,427	41,384	42	51		51	-20	-20	-1					38,499	51
060	Non-financial corporations	2,641,186	2,077,870	563,316	78,916	1,343	77,565	-9,434	-1,603	-7,831	-13,201	-39	-13,163	-3,443	2,577,460	61,405
070	Of which SMEs	2,589,786	2,038,261	551,525	78,916	1,343	77,565	-9,374	-1,577	-7,797	-13,201	-39	-13,163	-3,443	2,526,416	61,405
080	Households	7,235,446	6,360,899	874,547	203,816	3,134	200,101	-11,245	-3,914	-7,332	-29,839	-98	-29,739	-1,674	7,000,085	161,963
090	Debt securities	654,276	616,193	4,581				-2,255	-964	-1,291					113,148	
100	Central banks															
110	General governments	278,185	277,576					-159	-159						10,773	
120	Credit institutions	111,844	110,226					-112	-112						31,279	
130	Other financial corporations	30,465	4,139					-2	-2						3,403	
140	Non-financial corporations	233,782	224,251	4,581				-1,982	-691	-1,291					67,692	
150	Off-balance-sheet exposures	731,939	701,538	30,401	4,656	277	2,359	846	599	247	262		262		316,776	811
160	Central banks															
170	General governments	695	695												68	
180	Credit institutions	2,419	2,419					15	15							
190	Other financial corporations	5,526	3,549	1,978				2	1	1					1,382	
200	Non-financial corporations	331,417	318,665	12,752	3,049	4	1,243	465	297	167	76		76		202,380	196
210	Households	391,883	376,212	15,671	1,607	273	1,116	364	285	79	186		186		112,946	615
220	Total	12,944,147	11,437,758	1,472,888	287,439	4,754	280,076	-24,209	-7,507	-16,702	-43,302	-136	-43,164	-5,117	10,047,110	224,230

EU CR1-A: MATURITY OF EXPOSURES

		a	b	c	d	e	f
		Net exposure value					
31 Dec 2025 (EUR 1,000)		On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated maturity	Total
1	Loans and advances	103,669	240,615	856,007	9,438,954	75,013	10,714,258
2	Debt securities		173,666	609,666	140,088		923,420
3	Total	103,669	414,280	1,465,672	9,579,042	75,013	11,637,678

EU CR2: CHANGES IN THE STOCK OF NON-PERFORMING LOANS AND ADVANCES

31 Dec 2025 (EUR 1,000)		Gross carrying amount
010	Initial stock of non-performing loans and advances	282,783
020	Inflows to non-performing portfolios	130,489
030	Outflows from non-performing portfolios	-99,640
040	Outflows due to write-offs	-8,228
050	Outflow due to other situations	-91,412
060	Final stock of non-performing loans and advances	313,633

EU CQ1: CREDIT QUALITY OF FORBORNE EXPOSURES

		a	b	c	d	e	f	g	h
		Gross carrying amount/nominal amount of exposures with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collateral received and financial guarantees received on forborne exposures	
		Performing forborne	Non-performing forborne		On performing forborne exposures	On non-performing forborne exposures		Of which collateral and financial guarantees received on non-performing exposures with forbearance measures	
			Of which defaulted	Of which impaired					
31 Dec 2025 (EUR 1,000)									
005	Cash balances at central banks and other demand deposits								
010	Loans and advances	179,008	118,973	109,702	109,929	-2,594	-13,875	276,124	103,056
020	Central banks								
030	General governments								
040	Credit institutions								
050	Other financial corporations								
060	Non-financial corporations	73,492	36,652	33,701	33,272	-1,802	-5,098	100,612	31,357
070	Households	105,516	82,321	76,001	76,657	-792	-8,777	175,512	71,699
080	Debt Securities								
090	Loan commitments given	127	92	88	88	1	17	154	48
100	Total	179,134	119,065	109,790	110,017	-2,595	-13,892	276,278	103,103

		a	b	c	d	e	f	g	h
		Gross carrying amount/nominal amount of exposures with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collateral received and financial guarantees received on forborne exposures	
		Performing forborne	Non-performing forborne		On performing forborne exposures	On non-performing forborne exposures		Of which collateral and financial guarantees received on non-performing exposures with forbearance measures	
			Of which defaulted	Of which impaired					
31 Dec 2024 (EUR 1,000)									
005	Cash balances at central banks and other demand deposits								
010	Loans and advances	99,670	94,096	88,869	90,073	-910	-11,656	173,805	78,193
020	Central banks								
030	General governments								
040	Credit institutions								
050	Other financial corporations								
060	Non-financial corporations	40,374	29,557	27,964	28,219	-450	-4,405	62,129	24,046
070	Households	59,295	64,539	60,905	61,854	-460	-7,251	111,676	54,147
080	Debt Securities								
090	Loan commitments given	45	59	59	59	1	11	65	37
100	Total	99,715	94,155	88,928	90,132	-911	-11,668	173,870	78,229

EU CQ3: CREDIT QUALITY OF PERFORMING AND NON-PERFORMING EXPOSURES BY PAST DUE DAYS

		a	b	c	d	e	f	g	h	i	j	k	l
		Gross carrying amount/nominal amount											
		Performing exposures			Non-performing exposures								
		Not past due or past due ≤ 30 days	Past due > 30 days ≤ 90 days		Unlikely to pay that are not past due or are past due ≤ 90 days	Past due > 90 days ≤ 180 days	Past due > 180 days ≤ 1 year	Past due > 1 year ≤ 2 years	Past due > 2 years ≤ 5 years	Past due > 5 years ≤ 7 years	Past due > 7 years	Of which defaulted	
31 Dec 2025 (EUR 1,000)													
005	Cash balances at central banks and other demand deposits	1,298,651	1,298,651										
010	Loans and advances	10,467,156	10,441,846	25,309	313,633	192,404	22,808	26,188	32,249	31,080	4,002	4,902	298,702
020	Central banks	74,488	74,488										
030	General governments	8,523	8,523										
040	Credit institutions	64,568	64,568										
050	Other financial corporations	17,521	17,520		8			8					8
060	Non-financial corporations	2,819,874	2,816,121	3,754	87,065	53,080	7,416	9,467	8,793	6,727	939	643	82,059
070	Of which SMEs	2,767,539	2,763,785	3,754	87,065	53,080	7,416	9,467	8,793	6,727	939	643	82,059
080	Households	7,482,181	7,460,626	21,555	226,560	139,324	15,392	16,713	23,456	24,353	3,063	4,259	216,635
090	Debt securities	924,724	924,724		911	911							
100	Central banks												
110	General governments	413,054	413,054										
120	Credit institutions	297,587	297,587										
130	Other financial corporations	7,502	7,502										
140	Non-financial corporations	206,582	206,582		911	911							
150	Off-balance-sheet exposures	749,301			4,280								4,190
160	Central banks												
170	General governments	4,845											
180	Credit institutions	2,152											
190	Other financial corporations	4,453											
200	Non-financial corporations	333,760			2,510								2,463
210	Households	404,090			1,770								1,726
220	Total	13,439,832	12,665,222	25,309	318,823	193,315	22,808	26,188	32,249	31,080	4,002	4,902	302,891

		a	b	c	d	e	f	g	h	i	j	k	l
		Gross carrying amount/nominal amount											
		Performing exposures			Non-performing exposures								
		Not past due or past due ≤ 30 days	Past due > 30 days ≤ 90 days		Unlikely to pay that are not past due or are past due ≤ 90 days	Past due > 90 days ≤ 180 days	Past due > 180 days ≤ 1 year	Past due > 1 year ≤ 2 years	Past due > 2 years ≤ 5 years	Past due > 5 years ≤ 7 years	Past due > 7 years	Of which defaulted	
31 Dec 2024 (EUR 1,000)													
005	Cash balances at central banks and other demand deposits	1,486,582	1,486,582										
010	Loans and advances	10,071,351	10,032,570	38,781	282,783	173,312	20,805	30,357	23,513	25,829	5,119	3,847	266,905
020	Central banks	69,919	69,919										
030	General governments	8,925	8,925										
040	Credit institutions	74,449	74,449										
050	Other financial corporations	41,427	41,427		51	51							
060	Non-financial corporations	2,641,186	2,629,137	12,049	78,916	49,979	4,549	9,576	6,428	5,340	2,534	510	74,044
070	Of which SMEs	2,589,786	2,577,749	12,038	78,916	49,979	4,549	9,576	6,428	5,340	2,534	510	74,044
080	Households	7,235,446	7,208,714	26,732	203,816	123,282	16,256	20,782	17,085	20,489	2,585	3,337	192,861
090	Debt securities	654,276	654,276										
100	Central banks												
110	General governments	278,185	278,185										
120	Credit institutions	111,844	111,844										
130	Other financial corporations	30,465	30,465										
140	Non-financial corporations	233,782	233,782										
150	Off-balance-sheet exposures	731,939			4,656								4,318
160	Central banks												
170	General governments	695											
180	Credit institutions	2,419											
190	Other financial corporations	5,526											
200	Non-financial corporations	331,417			3,049								2,820
210	Households	391,883			1,607								1,498
220	Total	12,944,147	12,173,427	38,781	287,439	173,312	20,805	30,357	23,513	25,829	5,119	3,847	271,223

EU CQ5: CREDIT QUALITY OF LOANS AND ADVANCES TO NON-FINANCIAL CORPORATIONS BY INDUSTRY

		a	b	c	d	e
		Gross carrying amount				Accumulated impairment
		Of which non-performing		Of which loans and advances subject to impairment		
		Of which defaulted				
31 Dec 2025 (EUR 1,000)						
010	Agriculture, forestry and fishing	143,880	8,302	7,966	143,880	-2,917
030	Manufacturing	179,060	9,752	9,558	179,060	-3,765
060	Construction	224,966	14,278	12,480	224,966	-3,295
070	Wholesale and retail trade	150,386	7,118	6,400	150,386	-2,150
080	Transport and storage	70,947	2,513	2,513	70,947	-951
090	Accommodation and food service activities	77,164	7,086	7,078	77,164	-1,487
120	Real estate activities	1,713,013	27,014	26,177	1,712,263	-7,314
130	Professional, scientific and technical activities	86,741	3,782	3,027	86,741	-1,274
190	Other services	260,782	7,220	6,860	260,748	-2,507
200	Total	2,906,939	87,065	82,059	2,906,155	-25,660

The column f is not disclosed because there is no reporting in this column.

The row 190 "Other services" include also non-material industries (rows 020, 040, 050, 100, 110, 140, 150, 160, 170 and 180).

EU CQ7: COLLATERAL OBTAINED BY TAKING POSSESSION AND EXECUTION PROCESSES

		Collateral obtained by taking possession	
		Value at initial recognition	Accumulated negative changes
31 Dec 2025 (EUR 1,000)			
010	Property, plant and equipment (PP&E)		
020	Other than PP&E	892	-30
030	Residential immovable property	487	-15
040	Commercial Immovable property	405	-15
050	Movable property (auto, shipping, etc.)		
060	Equity and debt instruments		
070	Other collateral		
080	Total	892	-30

EU CRB – Additional disclosure related to the credit quality of assets

a) The scope and definitions of ‘past-due’ and ‘impaired’ exposures used for accounting purposes and the differences, if any, between the definitions of past due and default for accounting and regulatory purposes as specified by the EBA Guidelines on the application of the definition of default in accordance with Article 178 CRR.

A loan that meets at least one of the following criteria is classified as a **non-performing receivable**: the loan is classified as being in default, the loan is in ECL stage 3 or the loan is classified as a non-performing forbore exposure.

The definition of default used in the ECL for accounting purposes is consistent with the definition of default in Article 178 of the CRR. For accounting purposes, impaired assets are defined as contracts with customers classified as defaulted.

A past-due receivable is a receivable for which the capital, interest or fees have not been paid on the due date. When assessing the duration of the payment delay, situations in which the debtor changes as a result of corporate restructuring, as well as situations in which the delay in payment is due to changes in the payment terms permitted by the contract or legislation or a technical error in the system, shall be considered separately. In order for a customer to be classified as defaulted, the sum of the amounts due must be significant in terms of both the absolute and relative threshold for 90 consecutive days. The absolute threshold is met if the sum of the amounts past due exceeds EUR 100 for retail liabilities or EUR 500 for other exposures. The relative threshold is met if the sum of the amounts past due exceeds 1% of all of the customer’s liabilities.

b) The extent of past-due exposures (more than 90 days) that are not considered to be impaired and the reasons for this.

For accounting purposes, exposures that have been past due for more than 90 days are not treated as impaired if the sum of the amounts due is not significant in absolute and relative terms.

c) Description of methods used for determining general and specific credit risk adjustments.

The Savings Banks Amalgamation does not allocate part of the ECL to general credit risk adjustments but instead allocates ECL in full to specific credit risk adjustments. The Savings Banks Amalgamation’s assessment of the expected credit loss is based on the calculation

model which is complemented by the manual input of member credit institutions. The calculation principles for impairment and expected credit losses are described in the accounting policies section of the financial statements and in note 9.3 to the financial statements, “Impairment losses on financial assets”.

d) The institution’s own definition of a restructured exposure used for the implementation of point (d) of Article 178(3) CRR specified by the EBA Guidelines on default in accordance with Article 178 CRR when different from the definition of forbore exposure defined in Annex V to Commission Implementing Regulation (EU) 680/2014

The internal definition of forbore exposure corresponds to the regulatory definition. Receivables whose terms have been renegotiated due to the customer’s deteriorated ability to pay are reported as forbore exposures. In certain circumstances, when a debtor experiences financial difficulty, the customer is granted a concession on the terms of the loan in the form of an instalment-free period or restructuring the liability. The aim is to ensure the customer’s ability to pay and avoid potential credit losses. Granting forbearance is conditional on the customer’s financial difficulties being short-term and temporary.

4.3. STANDARDISED APPROACH

EU CRD – Qualitative disclosure requirements related to standardised model

a) Names of the external credit assessment institutions (ECAIs) and export credit agencies (ECAs) nominated by the institution, and the reasons for any changes over the disclosure period

The Savings Banks Amalgamation applies the external credit ratings of S&P Global Ratings Europe Limited and Moody’s Investors Service to define risk weights for credit risk exposures under the Standardised Approach. The use of external credit ratings from Moody’s Investors Service began in 2025 when the use of external ratings was expanded to corporate exposures.

b) The exposure classes for which each ECAI or ECA is used

External credit risk ratings are applied to the following exposure classes: Central governments

or central banks, Regional governments or local authorities, Public sector entities, Institutions, Corporates – Other, Covered bonds and Collective investment undertakings (CIU).

c) A description of the process used to transfer the issuer and issue credit ratings onto comparable assets items not included in the trading book

External issuer credit ratings are used for Central governments or central banks, Regional governments or local authorities, Public sector entities, Institutions and Collective investment undertakings (CIUs). External Issue credit ratings are used for Institutions, Corporates – Other and Covered bonds. Point 2 of Article 139 of CRR is not applied.

d) The association of the external rating of each nominated ECAI or ECA (as referred to in row (a)) with the risk weights that correspond with the credit quality steps as set out in Chapter 2 of Title II of Part Three CRR (except where the institution complies with the standard association published by the EBA)

Not applicable as the Amalgamation complies with the standard association published by the EBA.

EU CR3 – CRM TECHNIQUES OVERVIEW: DISCLOSURE OF THE USE OF CREDIT RISK MITIGATION TECHNIQUES

		Unsecured carrying amount	Secured carrying amount			
			Of which secured by collateral	Of which secured by financial guarantees		
					Of which secured by credit derivatives	
31 Dec 2025 (EUR 1,000)		a	b	c	d	e
1	Loans and advances	1,703,329	10,309,580	9,876,355	433,225	
2	Debt securities	712,277	211,142	137,804	73,339	
3	Total	2,415,607	10,520,722	10,014,159	506,563	
4	Of which non-performing exposures	9,369	254,998	244,182	10,816	
EU-5	Of which defaulted	6,241	244,136			

Loans and advances are mainly secured by mortgages on immovable property while financial guarantees are also used as a risk mitigation technique.

EU CR4 – STANDARDISED APPROACH – CREDIT RISK EXPOSURE AND CRM EFFECTS

31 Dec 2025 (EUR 1,000)		Exposures before CCF and before CRM		Exposures post CCF and post CRM		RWAs and RWAs density	
		On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet exposures	RWEAs	RWEAs density (%)
		a	b	c	d	e	f
1	Central governments or central banks	1,757,763		2,397,588	22,286	20,576	0.85%
2	Non-central government public sector entities	33,937	4,315	62,611	4,303	2,495	3.73%
EU 2a	Regional governments or local authorities	10,557	4,315	39,231	4,303	686	1.58%
EU 2b	Public sector entities	23,380		23,380		1,809	7.74%
3	Multilateral development banks	11,025		55,191			0.00%
EU 3a	International organisations	5,652		5,652			0.00%
4	Institutions	235,314	500	235,895	259	62,225	26.35%
5	Covered bonds	127,007		127,007		12,701	10.00%
6	Corporates	325,390	17,189	368,671	6,212	269,827	71.98%
6,1	Of which: Specialised Lending						-
7	Subordinated debt exposures and equity	24,765		24,765		28,588	115.44%
EU 7a	Subordinated debt exposures	4,915		4,915		7,372	150.00%
EU 7b	Equity	19,850		19,850		21,216	106.88%
8	Retail	531,463	343,083	233,507	16,527	178,551	71.41%
9	Secured by mortgages on immovable property and ADC exposures	9,667,350	380,602	9,172,552	154,914	3,895,456	41.76%
9,1	Secured by mortgages on residential immovable property – non IPRE	7,213,006	135,068	6,834,986	54,974	2,037,695	29.57%
9,2	Secured by mortgages on residential immovable property – IPRE	507,939	4,032	504,082	1,602	213,695	42.26%
9,3	Secured by mortgages on commercial immovable property – non IPRE	1,239,197	118,441	1,153,450	51,814	798,292	66.23%
9,4	Secured by mortgages on commercial immovable property – IPRE	415,339	7,468	399,637	2,570	395,667	98.37%
9,5	Acquisition, Development and Construction (ADC)	291,869	115,594	280,396	43,954	450,108	138.77%
10	Exposures in default	243,815	3,774	226,263	1,568	265,935	116.72%
EU 10a	Claims on institutions and corporates with a short-term credit assessment						-
EU 10b	Collective investment undertakings (CIU)	25,130		25,130		44,209	175.92%
EU 10c	Other items	104,027		104,027		96,706	92.96%
12	Total	13,092,637	749,463	13,038,857	206,069	4,877,269	36.82%

Exposures secured by mortgages on immovable property and ADC exposures constitute the largest exposure class, accounting for 73% of total exposures before CCF and before CRM, with an average risk weight of 41.76%. Both the total exposure amount and the level of risk-weighted assets have shown a slight increase compared with the previous year while the average risk weight across the exposure classes has decreased from 37.46% to 36.82%.

31 Dec 2024 (EUR 1,000)		Exposures before CCF and before CRM		Exposures post CCF and post CRM		RWAs and RWAs density	
		On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet exposures	RWAs	RWAs density (%)
		a	b	c	d	e	f
1	Central governments or central banks	1,808,975		2,437,254	23,652	25,136	1.02%
2	Regional government or local authorities	11,575	854	40,704	4,868	777	1.71%
3	Public sector entities	15,789		15,789		3,158	20.00%
4	Multilateral development banks	8,760		74,386			0.00%
5	International organisations	5,561		5,561			0.00%
6	Institutions	165,788	533	166,751	267	37,001	22.15%
7	Corporates	1,370,283	128,857	1,308,729	43,593	1,101,303	81.44%
8	Retail	1,774,001	467,276	1,082,728	71,515	759,077	65.76%
9	Secured by mortgages on immovable property	7,004,731	130,671	7,004,731	54,676	2,402,661	34.03%
10	Exposures in default	223,437	4,048	205,279	1,745	231,607	111.87%
11	Exposures associated with particularly high risk						-
12	Covered bonds	20,847		20,847		2,085	10.00%
13	Institutions and corporates with a short-term credit assessment						-
14	Collective investment undertakings	31,889		31,889		28,472	89.29%
15	Equity	43,085		43,085		79,943	185.55%
16	Other items	112,108		112,108		104,603	93.31%
17	Total	12,596,829	732,240	12,549,840	200,315	4,775,823	37.46%

EU CR5 – STANDARDISED APPROACH

31 Dec 2025 (EUR 1,000)

	Exposure classes	Risk weight																		Total	Of which unrated
		0%	4%	10%	20%	30%	35%	45%	50%	60%	75%	90%	100%	105%	110%	150%	250%	1250%	Others		
		a	c	d	e	f	g	i	j	k	m	o	p	q	r	t	u	x	y		
1	Central governments or central banks	2,400,364	8,054	3,495												7,962			2,419,874	2,368,143	
2	Non-central government public sector entities	54,440			12,473														66,914	66,914	
EU 2a	Regional governments or local authorities	40,104			3,430														43,534	43,534	
EU 2b	Public sector entities	14,337			9,043														23,380	15,498	
3	Multilateral development banks	55,191																	55,191	55,191	
EU 3a	International organisations	5,652																	5,652	5,652	
4	Institutions	23,901			115,958	45,566		50,728											236,153		
5	Covered bonds			127,007															127,007	127,007	
6	Corporates				102			124,258		126,677		123,040				806			374,883	121,253	
6.1	Of which: Specialised Lending																				
7	Subordinated debt exposures and equity											18,940			4,915	910			24,765	24,765	
EU 7a	Subordinated debt exposures														4,915				4,915	4,915	
EU 7b	Equity											18,940				910			19,850	19,850	
8	Retail exposures									247,099		2,935							250,034	250,034	
9	Secured by mortgages on immovable property and ADC exposures	423			5,741,655	52,716	41,710	122,924		280,883	1,790,084	28,242	574,537	41,427	15,978	538,233		98,653	9,327,466	9,327,466	
9.1	Secured by mortgages on residential immovable property – non IPRE				5,595,490						1,192,723		101,746						6,889,960	6,889,960	
9.1.1	no loan splitting applied										193,018		30,866						223,884	223,884	
9.1.2	loan splitting applied (secured)				5,595,490														5,595,490	5,595,490	
9.1.3	loan splitting applied (unsecured)									999,705		70,881							1,070,586	1,070,586	
9.2	Secured by mortgages on residential immovable property – IPRE				146,165	52,716	41,710	122,924		28,279	43,506		1,576	41,427		27,382			505,685	505,685	
9.3	Secured by mortgages on commercial immovable property – non IPRE	423								252,604	553,855		398,381						1,205,264	1,205,264	
9.3.1	no loan splitting applied	423									536,574		375,215						912,213	912,213	
9.3.2	loan splitting applied (secured)									252,604									252,604	252,604	
9.3.3	loan splitting applied (unsecured)										17,281		23,166						40,447	40,447	
9.4	Secured by mortgages on commercial immovable property – IPRE											28,242		15,978	259,335			98,653	402,207	402,207	
9.5	Acquisition, Development and Construction (ADC)												72,834		251,516				324,350	324,350	
10	Exposures in default												151,623		76,208				227,831	227,831	
EU 10a	Claims on institutions and corporates with a short-term credit assessment																				
EU 10b	Collective investment undertakings (CIU)	578			928	49			353				20,869				645	1,708	25,130	25,130	
EU 10c	Other items	6,468			1,066								96,493						104,027	104,027	
EU 11c	Total	2,547,017	8,054	130,502	5,872,182	98,331	41,710	122,924	175,339	280,883	2,163,860	28,242	988,437	41,427	15,978	620,161	9,517	1,708	98,653	13,244,926	12,703,412

Columns b, h, l, n, s, v and w are not disclosed because there is no reporting on these columns. Exposures secured by mortgages on immovable property are mainly residential non-IPRE exposures treated as secured with a risk weight of 20%. Central government exposures include deferred tax assets which have not been deducted from the own funds and thus treated with a risk weight of 250%. Exposures with a risk weight of 70% are reported in the column 'Others' to ensure the report aligns with the classification used in the COREP Own Funds report.

EU CRC – Qualitative disclosure requirements related to CRM techniques

a) A description of the core features of the policies and processes for on- and off-balance sheet netting and an indication of the extent to which institutions make use of balance sheet netting

The Amalgamation does not apply on-balance-sheet, off-balance-sheet netting and master netting agreements. Netting agreements are only used to calculate the exposure value of derivatives.

b) The core features of policies and processes for eligible collateral evaluation and management

The Amalgamation has policies and procedures for collateral evaluation and management which ensure the principles of legal certainty and evaluation of the collaterals. The fair value of real estate collateral is determined using an appraisal report prepared by an external party or a statistical model as the basis for evaluation. The collateral appraiser must possess sufficient expertise and experience. The appraisal may also be based on a sales contract between independent parties. The fair value is used to determine the acceptable collateral value for lending using collateral valuation percentages. The prices of real estate collateral are monitored using price indices and expert statements. In capital adequacy calculations, the restrictions of the Capital Requirements Regulation (CRR) are taken into account in the value of real estate collateral.

c) A description of the main types of collateral taken by the institution to mitigate credit risk

Residential collaterals constitute the largest collateral type used in capital adequacy calculations. In addition, commercial buildings and shares entitling their holders to the possession of a commercial property are used. Financial collaterals used include deposits and securities.

d) For guarantees and credit derivatives used as credit protection, the main types of guarantor and credit derivative counterparty and their creditworthiness used for the purposes of reducing capital requirements, excluding those used as part of synthetic securitisation structures

The Amalgamation uses institutional guarantors such as the Finnish government and municipalities, financial institutions, the credit guarantor Finnvera, European Investment Fund and the insurance company Garantia. All of the guarantors used have good or excellent creditworthiness. No credit derivatives are used as credit protection.

e) Information about market or credit risk concentrations within the credit mitigation taken

The most significant single guarantor is the Finnish government. The Amalgamation's loans secured by mortgages are covered by immovable real estate situated in Finland.

5. COUNTERPARTY CREDIT RISK

EU CCRA – Qualitative disclosure related to CCR

a) A description of the methodology used to assign internal capital and credit limits for counterparty credit exposures, including the methods to assign those limits to exposures to central counterparties

Counterparty credit risk (CCR) is defined as the risk that a counterparty to a financial transaction defaults prior to the final settlement of the associated cash flows. Internal capital requirements and credit limits for CCR are determined on the basis of regulatory counterparty credit risk exposures, calculated using the Standardised Approach for Counterparty Credit Risk (SA-CCR). CCR exposures are subject to large exposure limits, which are monitored on an ongoing basis.

b) A description of policies related to guarantees and other credit risk mitigants, such as the policies for securing collateral and establishing credit reserves

Counterparty credit risk arising from credit institution counterparties is mitigated primarily through the exchange of collateral under ISDA Credit Support Annex (CSA) agreements. Both received and posted collateral consist exclusively of cash, and collateral is reconciled on a daily basis with bilateral counterparties and central counterparties. Only Sp Mortgage Bank enters into new OTC derivative contracts, while all other new derivative transactions are centrally cleared through a CCP.

c) A description of policies with respect to General Wrong-Way risk and Specific Wrong-Way risk as defined in Article 291 of CRR

The derivative portfolio consists solely of interest rate derivatives, for which a material correlation between counterparty creditworthiness and transaction values is considered unlikely. As a result, wrong-way risk is assessed as low.

d) The amount of collateral the institution would have to provide if its credit rating was downgraded

The Amalgamation has no contractual arrangements under which a downgrade of the Central Bank of Savings Banks' credit rating would trigger increased collateral requirements.

e) Any other risk management objectives and relevant policies related to CCR

No other material risk management objectives or policies specific to counterparty credit risk apply beyond those described above.

EU CCR1 – ANALYSIS OF CCR EXPOSURE BY APPROACH

		a	b	c	d	e	f	g	h
		Replacement cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWEA
31 Dec 2025 (EUR 1,000)									
1	SA-CCR (for derivatives)	3,805	16,802		1.4	28,850	28,850	28,850	5,770
6	Total					28,850	28,850	28,850	5,770

Rows EU-1, EU-2 and 2–5 are not disclosed as there is no reporting in these rows.

EU CCR3 – STANDARDISED APPROACH – CCR EXPOSURES BY REGULATORY EXPOSURE CLASS AND RISK WEIGHTS

31 Dec 2025 (EUR 1,000)		Risk weight											
Exposure classes		a	b	c	d	e	f	g	h	i	j	k	l
		0%	2%	4%	10%	20%	50%	70%	75%	100%	150%	Others	Total exposure value
1	Central governments or central banks												
2	Regional government or local authorities												
3	Public sector entities												
4	Multilateral development banks												
5	International organisations												
6	Institutions		13,495			28,850							42,345
7	Corporates												
8	Retail												
9	Institutions and corporates with a short-term credit assessment												
10	Other items												
	Total exposure value		13,495			28,850							42,345

EU CCR5 – COMPOSITION OF COLLATERAL FOR CCR EXPOSURES

31 Dec 2025 (EUR 1,000)		a	b	c	d	e	f	g	h
		Collateral used in derivative transactions				Collateral used in SFTs			
Collateral type	Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral		
	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	
1	Cash – domestic currency	74	16,210	8,051	36,930				
	Total	74	16,210	8,051	36,930				

Rows 2–8 are not disclosed because there is no reporting in these rows.

EU CCR8 – EXPOSURES TO CCPS

31 Dec 2025 (EUR 1,000)		a	b
		Exposure value	RWEA
1	Exposures to QCCPs (total)		270
2	Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which	13,495	270
3	(i) OTC derivatives	13,495	270
7	Segregated initial margin	8,051	
11	Exposures to non-QCCPs (total)		

Rows 4–6, 8–10 and 12–20 are not disclosed as there is no reporting in these rows.

6. CREDIT VALUATION ADJUSTMENT

EU CVAA: Qualitative disclosure requirements related to credit valuation adjustment risk

a) an overview of the processes to identify, measure, hedge and monitor CVA risk

The Amalgamation is exposed to credit valuation adjustment (CVA) risk through its use of over-the-counter (OTC) derivatives entered into for the purpose of hedging interest rate risk. CVA risk arises from potential changes in the credit quality of derivative counterparties that may affect the fair value of these instruments.

CVA risk is calculated for all relevant OTC derivative exposures in accordance with regulatory requirements, applying the basic approach to CVA risk. The calculation captures counterparty credit risk embedded in derivative valuations and is performed at solo and consolidated level.

The Amalgamation does not hedge CVA risk, as the level of CVA exposure is considered limited due to the nature of the derivative portfolio, the use of variation margin agreements and,

where applicable, central clearing. Derivative transactions are entered into exclusively for risk-hedging purposes and not for trading or CVA risk mitigation. CVA risk is monitored as part of the internal capital adequacy assessment process (ICAAP) and forms part of the Amalgamation's overall counterparty credit risk management framework.

b) whether the Amalgamation meets all of the conditions set out in Article 273a(2); where those conditions are met, whether the Amalgamation has chosen to calculate the own funds requirements for CVA risk using the simplified approach set out in Article 385; where the Amalgamation has chosen to calculate the own funds requirements for CVA risk using the simplified approach, the own funds requirements for CVA risk in accordance with that approach

At the time of reporting, the Amalgamation meets the conditions set out in Article 273a(2) of CRR, but has chosen to use the basic approach to calculating CVA risk set out in Article 384 of CRR.

EU CVA 1 – CREDIT VALUATION ADJUSTMENT RISK UNDER THE REDUCED BASIC APPROACH (R-BA)

		a	b
		Components of Own Funds Requirements	Own funds requirements
31 Dec 2025 (EUR 1,000)			
1	Aggregation of systematic components of CVA risk		
2	Aggregation of idiosyncratic components of CVA risk		
3	Total		1,273

7. MARKET RISK

EU MRA – Qualitative disclosure requirements related to market risk

a) A description of the institution's strategies and processes to manage market risk, including:

- **An explanation of management's strategic objectives in undertaking trading activities, as well as the processes implemented to identify, measure, monitor and control the institution's market risks**
- **A description of their policies for hedging and mitigating risk and strategies and processes for monitoring the continuing effectiveness of hedges**

Market risks in banking activities arise from the banking books of the member credit institutions, which consist of lending and borrowing, wholesale market funding and investment and liquidity portfolios.

In general, market risk refers to the impact of a change in market prices on the market value of financial assets and liabilities. The most important market risk in banking activities is the interest rate risk in the banking book, which is measured through both net present value and net interest income.

The banking activities of the Savings Banks do not, as a rule, include trading on their own account or on a customer's account. The use of derivatives is limited to hedging purposes. A member credit institution may have a small trading book as defined in Article 94 of the EU capital adequacy regulation.

The market risk in the investment and liquidity portfolios consists of the investments' price, interest rate and currency risks. Changes in stock prices, interest rates and exchange rates affect the value and yield of the investment portfolio. The risks in the investment and liquidity portfolios are managed by diversifying the investments by investment class, counterparty, sector and geography.

Equity risk arises primarily from the liquidity and investment portfolios of member credit institutions. Unlisted equity holdings consist largely (53%) of intra-group holdings that are not part of the Savings Banks Amalgamation.

Currency risk refers to the impact of changes in foreign exchange rates on the bank's result or own funds. Minor foreign exchange risk may arise from instruments in the investment portfolio. Open currency risk is not allowed in deposits from the customers or in the liquidity buffer of the member credit institutions. The currency position of member credit institutions is monitored using the capital adequacy calculation method (the capital requirement is calculated if the total net currency position is more than 2% of total own funds).

Commodity risk refers to the impact of changes in commodity prices. The business operations, including investment activities, of the member credit institutions of the Savings Banks Amalgamation do not involve commodity risk taking.

b) A description of the structure and organisation of the market risk management function, including a description of the market risk governance structure established to implement the strategies and processes of the institution discussed in row (a) above, and that describes the relationships and the communication mechanisms between the different parties involved in market risk management.

The Savings Banks Amalgamation follows the principle of three lines of defense with respect to risk management and compliance. The governance of market risk within the Savings Banks Amalgamation is built around a multilayered structure as follows:

- Strategic oversight and limit-setting (the Board of Directors of Savings Banks' Union Coop and its committees)
- Operational implementation (Executive management of each member credit institution)
- Independent monitoring (Risk Control unit)
- Entity-level governance (Boards and management of member credit institutions)

The Board of Directors of Savings Banks' Union Coop has overall responsibility for market risk management across the Savings Banks Amalgamation. It approves the market risk strategy and sets the risk appetite for the Amalgamation, including the group-level market risk limits and any additional monitoring thresholds. The Board also defines the principles and procedures that govern the identification, measurement, limitation, monitoring, and control of market risk. In fulfilling these responsibilities, the Board acts in a strategic and supervisory capacity and ensures that the entire Amalgamation operates within its defined market risk tolerance.

The Risk Committee supports the Board of Directors of Savings Banks' Union Coop in matters related to market risk strategy and risk appetite. The Risk Committee supports the Board in overseeing that the central institution and member credit institutions follow the approved risk strategy and risk appetite, and in ensuring that market-risk-related procedures defined in the strategy are implemented throughout the Amalgamation.

The Asset and Liability Committee monitors and manages the structural interest rate risk, market risk and liquidity risks of the Savings Banks Amalgamation in accordance with the principles and limits set by the Board of Directors of Savings Banks' Union Coop. In addition, the Asset and Liability Committee coordinates the refinancing and liquidity management of the Savings Banks Amalgamation together with the Treasury of the Central Bank of Savings Banks.

The Board of Directors of each member institution is responsible for the institution's market risk management and for ensuring that this management is aligned with the group-level market risk appetite framework.

The executive management of each member credit institution is responsible for the practical implementation of the market risk strategy approved by the board of the member credit institution.

The Central Institution's Risk Control function independently monitors the group-level market risk limits and other thresholds set in the strategy and reports its findings to management and the relevant committees. It also ensures that internal control is properly organised.

c) Scope and nature of risk reporting and measurement systems

The market risk in the investment portfolio is measured and followed by investment class, counterparty and sector. Limits and thresholds have been set for market risk applicable to both individual member banks and the Amalgamation. The development of the investment portfolio and the largest counterparties are reported on a regular basis to the Board of Directors of Savings Banks' Union Coop and the Risk Committee.

The capital adequacy assessment process (ICAAP) at the member credit institution and Amalgamation level, which allocates capital to cover the market risks of the banking book in normal and stress scenarios, is an important tool in measuring and monitoring the market risks included in the banking book.

EU CR10 – SPECIALISED LENDING AND EQUITY EXPOSURES UNDER THE SIMPLE RISKWEIGHTED APPROACH

EU CR10.5 EQUITY EXPOSURES UNDER ARTICLES 133 (3) TO (6) AND 495A(3) CRR

31 Dec 2025 (EUR 1,000)

Equity exposures under Articles 133 (3) to (6) and 495a(3) CRR						
Categories	On-balance-sheet exposure	Off-balance-sheet exposure	Risk weight	Exposure value	Risk weighted exposure amount	Expected loss amount
	a	b	c	d	e	f
Private equity exposures	18,959		100%	18,940	18,940	
Other equity exposures	911		250%	910	2,276	
Total	19,870			19,850	21,216	

8. INTEREST RATE RISK IN THE BANKING BOOK

EU IRRBBA – Qualitative information on interest rate risks of non-trading book activities

a) A description of how the institution defines IRRBB for purposes of risk control and measurement

The Amalgamation is exposed to interest rate risk in the banking book arising from its retail banking activities. IRRBB refers to the potential adverse impact of interest rate changes on both the economic value of equity (EVE) and net interest income (NII). The risk originates from the non-trading banking books of the member credit institutions, including lending and deposit activities, wholesale funding, and the investment portfolio. The Amalgamation does not maintain a trading book.

The objective of IRRBB management is to ensure that changes in interest rates do not materially impair earnings stability or capital adequacy. The Amalgamation's risk appetite for IRRBB is defined through limits approved by the Board of Directors of the Central Institution and is monitored on an ongoing basis.

IRRBB is measured using supervisory and internal metrics for both EVE and NII. EVE risk is assessed using the six standard supervisory shock scenarios. NII risk is measured by applying a 1 percentage point parallel interest rate shock to expected net interest income over a 12-month horizon, based on a static balance sheet assumption. Modelled maturities are applied to non-maturing deposits, and contractual floor assumptions are reflected in the calculations.

IRRBB is mitigated through structural balance sheet management and, where appropriate, the use of interest rate derivatives, primarily interest rate swaps. Mitigation actions are taken in line with the defined risk appetite and internal limits, based on the outcomes of risk measurement and monitoring.

b) A description of the institution's overall IRRBB management and mitigation strategies

The Amalgamation manages interest rate risk in the banking book (IRRBB) within an established risk management framework designed to ensure consistency with its defined risk appetite and regulatory expectations. IRRBB exposures are monitored against board-approved limits, and measurement outcomes are analysed to support timely risk management actions.

Mitigation of IRRBB is achieved through a combination of structural balance sheet management and, where appropriate, the use of interest rate derivatives, primarily interest rate swaps. Mitigation measures are applied in line with approved policies and are informed by the results of EVE and NII monitoring and limit utilisation.

Stress testing forms an integral part of the IRRBB framework. In addition to supervisory interest rate shock scenarios, internal shock scenarios are applied to assess the sensitivity of earnings and economic value to adverse interest rate developments. Stress test results and outcome analyses are used to evaluate the adequacy of existing mitigation measures and support management decision-making.

The Asset and Liability Committee (ALCO) is responsible for the ongoing oversight of IRRBB. ALCO reviews risk measurement results and monitors compliance with established limits. IRRBB exposures are reported regularly to senior management.

IRRBB measurement methodologies and underlying models use modelling assumptions that are reviewed periodically. Internal audit provides additional assurance on the effectiveness of IRRBB governance, the control framework, and compliance with internal policies and regulatory requirements.

c) The periodicity of the calculation of the institution's IRRBB measures, and a description of the specific measures that the institution uses to gauge its sensitivity to IRRBB

Sensitivity to interest rate risk in the banking book is assessed using measures of both economic value of equity (EVE) and net interest income (NII).

EVE risk is measured by estimating the change in the present value of expected future cash flows of assets and liabilities under prescribed interest rate shock scenarios, including the six supervisory scenarios, based on a run-off balance sheet assumption.

NII risk is measured over a one-year forward-looking horizon by assessing the impact of interest rate changes on projected net interest income, using both static and dynamic balance sheet assumptions.

IRRBB measures are calculated on a daily basis and are monitored and reported on a monthly basis within the institution's risk management and governance framework.

d) A description of the interest rate shock and stress scenarios that the institution uses to estimate changes in the economic value and in net interest income

Interest rate risk in the banking book is assessed by applying a range of prescribed interest rate shock scenarios to estimate the sensitivity of both the economic value of equity (EVE) and net interest income (NII) to changes in market interest rates.

The Amalgamation applies the standard supervisory interest rate shock scenarios as defined in regulatory guidance. These scenarios include parallel upward and downward shifts of the interest rate curve, as well as non-parallel changes designed to capture yield curve risk. Non-parallel scenarios reflect changes in the slope and curvature of the yield curve, including steepening, flattening, short-term rate shocks, and long-term rate shocks.

Where applicable, scenarios are subject to regulatory constraints, including interest rate floors, to ensure that modelled interest rate paths remain realistic in low or negative interest rate environments.

The results of the interest rate shock scenarios are used to assess the impact of adverse interest rate developments on EVE and NII, to monitor exposures against established limits, and to support the institution's interest rate risk management and mitigation decisions.

e) A description of the key modelling and parametric assumptions different from those used for disclosure of template EU IRRBB1

The modelling and parametric assumptions used for internal IRRBB reporting are identical to those applied in Template EU IRRBB1.

f) A high-level description of how the institution hedges its IRRBB, as well as the associated accounting treatment

Interest rate risk in the banking book is hedged using derivative instruments, primarily interest rate swaps. Within the Amalgamation, individual Savings Banks hedge their interest rate risk exposures through internal hedging arrangements with the Central Bank of Savings Banks, which, in turn, hedges the aggregated interest rate risk exposure externally in the market.

Sp Mortgage Bank hedges its interest rate risk exposures directly with external counterparties.

Hedging activities are intended to reduce the sensitivity of both economic value of equity and net interest income to adverse interest rate movements and thereby support compliance with the established risk appetite and limits.

All interest rate hedging instruments are accounted for using fair value hedge accounting. The effectiveness of hedge relationships is assessed on a quarterly basis in accordance with applicable accounting standards.

g) A description of key modelling and parametric assumptions used for the IRRBB measures in template EU IRRBB1

The calculation of interest rate risk in the banking book measures disclosed in template EU IRRBB1 is based on internal behavioural models and assumptions applied consistently across the institution.

The modelling of non-maturity deposits for the purposes of calculating the economic value of equity is based on customer segment and deposit product type. These characteristics are used to distinguish stable and core deposit components. Behavioural repricing maturities for core deposits are determined by applying pass-through rates derived from historical observations of customer rate sensitivity across different deposit segments. The resulting behavioural repricing profiles reflect the expected timing and extent of repricing rather than contractual maturity.

Loan prepayment rates and early withdrawal rates for fixed-term deposits are estimated based on observed historical customer behaviour. The modelling takes into account relevant product features and prevailing interest rate conditions and is applied consistently for IRRBB measurement purposes. Prepayment and early withdrawal assumptions are considered material, as changes in these assumptions may significantly affect the timing of cash flows and the estimated sensitivity of both economic value of equity and net interest income to interest rate movements.

h) Explanation of the significance of the IRRBB measures and of their significant variations since previous disclosures

The IRRBB measures disclosed in template EU IRRBB1 reflect the institution's sensitivity of both economic value of equity (EVE) and net interest income (NII) to adverse interest rate movements. The results indicate that the Amalgamation's exposure to interest rate risk in the banking book remains moderate and well within both its internal risk appetite limits and the supervisory outlier test (SOT) thresholds.

Since the previous disclosure reference date, no significant variations in the EVE or NII IRRBB measures have been observed. The results have remained broadly stable, reflecting a balanced repricing profile of assets and liabilities and the continued effectiveness of the institution's interest rate risk management and hedging strategies.

i) Any other relevant information regarding the IRRBB measures disclosed in template EU IRRBB1

The IRRBB measures disclosed in template EU IRRBB1 are based on the application of the standard supervisory interest rate shock scenarios. These scenarios include parallel upward and downward shifts and a range of non-parallel yield curve shocks designed to capture slope and curvature risks. Scenario parameters are applied in accordance with the applicable regulatory framework and reflect regulatory floors to ensure realistic modelling in low or negative interest rate environments.

Net interest income (NII) is defined as the difference between interest income and interest expense arising from interest-sensitive assets and liabilities in the banking book. Changes in NII disclosed in template EU IRRBB1 reflect the impact of the supervisory interest rate shock scenarios on expected net interest income over a 12-month forward-looking horizon.

The NII calculations are performed under a static balance sheet assumption, whereby maturing positions are replaced with new positions of similar characteristics. Contractual terms are applied to all instruments, including interest rate floors on assets and liabilities where

applicable. Behavioural assumptions, including those for non-maturing deposits and products with optionalities, are applied consistently with the institution's internal IRRBB framework.

The parameters and assumptions used for the supervisory shock scenarios and the computation of NII are applied consistently across reporting periods to ensure comparability of disclosed IRRBB measures.

1, 2) Disclosure of the average and longest repricing maturity assigned to non-maturity deposits

The behavioural repricing maturities assigned to non-maturity deposits from retail and non-financial wholesale counterparties are determined in accordance with the institution's internal IRRBB modelling framework.

For retail non-maturity deposits, the average repricing maturity applied to the core deposit component is 2.8 years, with a longest repricing maturity of Y years. For the full amount of retail non-maturity deposits, the average and longest repricing maturities are 2.4 years and 7.5 years, respectively.

For non-financial wholesale non-maturity deposits, the average repricing maturity applied to the core deposit component is 1.1 years, with a longest repricing maturity of 6.5 years. For the full amount of non-financial wholesale non-maturity deposits, the average and longest repricing maturities are 0.6 years and 6.5 years, respectively.

EU IRRBB1 – INTEREST RATE RISKS OF NON-TRADING BOOK ACTIVITIES

(EUR 1,000)

Supervisory shock scenarios	a		b		c		d	
	Changes of the economic value of equity				Changes of the net interest income			
	Current period 31 Dec 2025	Last period 31 Dec 2024	Current period 31 Dec 2025	Last period 31 Dec 2024	Current period 31 Dec 2025	Last period 31 Dec 2024	Current period 31 Dec 2025	Last period 31 Dec 2024
1 Parallel up	-6,875	3,596	21,993	23,819				
2 Parallel down	-5,452	-37,912	-28,478	-29,935				
3 Steepener	19,754	36,494						
4 Flattener	-21,018	-37,233						
5 Short rates up	-21,503	-32,204						
6 Short rates down	19,045	26,308						

Last period's figures have been amended following their initial disclosure.

9. LIQUIDITY RISK

EU LIQA – Liquidity risk management

a) Strategies and processes in the management of the liquidity risk, including policies on diversification in the sources and tenor of planned funding

Liquidity risk is managed by ensuring that the Amalgamation's funding is obtained from stable sources such as retail deposits as well as wholesale market funding of sufficient tenors. Additionally, readiness to access contingency sources of funding is maintained. The liquidity position is reported regularly to the Central Institution's Board of Directors, Risk Committee and the Amalgamation's Asset and Liability Committee (ALCO). The Central Institution's Board of Directors declares that the Amalgamation's liquidity risk management arrangements and systems are adequate with regard to the Amalgamation's profile and strategy.

Treasury monitors the structural funding risk on a monthly basis. The risk is measured using the net stable funding ratio (NSFR), the loan-to-deposit ratio and a 10-year horizon gap analysis, which assesses the suitability of the funding mix for funding the Amalgamation's long-term assets.

The Amalgamation's unsecured wholesale funding is obtained by the Central Bank of Savings Banks, which issues long-term bonds and short-term CDs and accepts money market deposits mainly from domestic and foreign institutional investor clients. Savings banks may issue retail bonds such as retail debentures. Sp Mortgage Bank issues covered bonds, which are a natural source of funding for the Amalgamation, given its focus on residential lending.

b) Structure and organisation of the liquidity risk management function (authority, statute, other arrangements)

The Board of Directors of the Amalgamation's Central Institution has the overall responsibility for the Amalgamation's liquidity risk strategy, risk appetite and procedures for the management of liquidity risk, namely, the identification, measuring, limiting, monitoring and controlling

of liquidity risk. The Central Institution approves the Amalgamation's liquidity risk strategy, including the funding plan and the contingency funding plan.

The Amalgamation's Asset and Liability Committee (ALCO) plans and prepares for the Central Institution's Board of Directors the Amalgamation's liquidity risk strategy and monitors its implementation at the Amalgamation level.

The Risk Control unit is responsible for the independent monitoring of the limits set out in the Amalgamation's liquidity risk strategy and reporting to the Central Institution's management board, ALCO, Risk Committee and Board of Directors.

The Central Bank of Savings Banks provides payment transmission and settlement services for the Amalgamation. Each member has its own liquidity management function, except Sp Mortgage Bank, which has outsourced liquidity management to the Central Bank of Savings Banks. The Central Bank of Savings Banks' Treasury is responsible for the operational execution of the liquidity risk strategy at the Amalgamation level. The Treasury is also responsible for the upkeep and testing of the contingency funding plan and for the operational management of the liquidity buffer. A liquidity agreement has been signed between the Central Bank of Savings Banks and other member banks, ensuring that there are no legal or operational impediments to the Treasury using the Amalgamation's liquid assets. The Treasury produces the funding plan annually for the Central Institution's Board of Directors, while Asset and Liability Management prepare the liquidity risk strategy and the contingency funding plan.

The basis for liquidity risk measurement and monitoring is the member bank position data in the Central Bank of Savings Banks' treasury system, which is based on data from the loan and deposit systems. The treasury system also holds the necessary data on the investment portfolio and derivatives. Additionally, the treasury system is also used for maintaining the portfolio, organisation, and limit structures necessary for the measurement, monitoring, reporting, and control of market risk, interest rate risk and liquidity risk.

The FSA has granted the Central Institution the authority to grant individual member banks a waiver from the liquidity requirements as set out in EU Capital Requirement Regulation (EU) 575/2013 Part Six, including LCR and NSFR.

c) A description of the degree of centralisation of liquidity management and interaction between the group's units

Liquidity management at the Amalgamation level is conducted on a centralised basis and is overseen by the Central Bank of Savings Banks' Treasury, as described in the previous section titled "Structure and organisation of the liquidity risk management function". The Amalgamation entities are responsible for the management of their liquidity positions, including the maintenance of adequate balances on accounts held with the Central Bank of Savings Banks.

Liquidity requirements are not applied on an individual basis to entities within the Amalgamation. The Financial Supervisory Authority (FSA) has granted the Central Institution the authority to grant member banks permission to deviate from the applicable liquidity requirements, as described in the preceding section titled "Structure and organisation of the liquidity risk management function".

d) Scope and nature of liquidity risk reporting and measurement systems

The main liquidity risk measurement and monitoring methods at the Amalgamation level are the cash position, the size of the liquidity buffer, which is controlled by stress testing, the liquidity coverage ratio (LCR) and the net stable funding requirement (NSFR).

Liquidity risk is assessed across two dimensions: short-term liquidity risk and long-term structural funding risk. Liquidity risk represents the risk that the Amalgamation may be unable to meet its payment obligations as they fall due without incurring material financial stress. Short-term liquidity risk is measured using the Liquidity Coverage Ratio (LCR). Structural funding risk refers to the risk arising from imbalances in the long-term funding structure of the balance sheet, including mismatches in the maturities, pricing bases, or behavioural characteristics of assets and liabilities. Structural funding risk is measured using the Net Stable Funding Ratio (NSFR).

The Amalgamation's liquidity risk framework includes internal limits addressing the size and maturity diversification of wholesale funding. These limits are defined across different time horizons, with separate constraints applied to asset-backed (covered bonds) and other publicly issued wholesale funding as well as to other forms of non-publicly issued wholesale funding. In addition, concentrations by counterparty and by instrument are subject to ongoing monitoring.

The Risk Control function of the Central Institution is responsible for the independent monitoring of liquidity risk, as well as for the validation of the systems and methodologies used in its measurement. The function also oversees compliance with limits and other thresholds at the Amalgamation level. Risk Control and Asset and Liabilities Management report thereon to the Board, the Risk Committee, and the Asset and Liability Committee (ALCO). The Risk Committee and ALCO reporting is conducted on a monthly basis, while reporting to the Board takes place quarterly. Reporting frequency can be increased upon request.

e) Policies for hedging and mitigating the liquidity risk and strategies and processes for monitoring the continuing effectiveness of hedges and mitigants

The Amalgamation's funding plan forms part of the annual planning and liquidity management process and outlines the anticipated funding needs and funding strategy over the next couple of years. The implementation of the plan is subject to regular monitoring and may be updated during the year if necessary. The plan provides high-level guidance on the development of wholesale funding, and deposits are modelled to be in line with the Amalgamation's business growth strategy. The funding plan is approved by the boards of directors of the Central Bank of Savings Banks and Sp Mortgage Bank.

The Central Bank of Savings Banks is responsible for monitoring the intra-day and daily liquidity at the Amalgamation level. The Central Bank is also responsible for securing the Amalgamation's payment transactions. Policies also include short-term liquidity risk and long-term structural funding risk monitoring which were highlighted in the previous section, "Scope and nature of liquidity risk reporting and measurement systems". Further details regarding the liquidity buffer are disclosed in section EU LIQB.

Derivatives are used exclusively for hedging purposes. Hedging activities within the Amalgamation primarily comprise interest rate swaps associated with bonds issued by the Central Bank of Savings Banks and Sp Mortgage Bank.

As the Amalgamation has no material foreign exchange exposure, non-euro hedging is not required.

f) An outline of the bank's contingency funding plans

The Amalgamation's liquidity contingency plan establishes a framework designed to ensure the Amalgamation's ability to meet its payment obligations, including under liquidity stress conditions. The Amalgamation's contingency funding plan describes the sources of contingency funding and the estimated amount of funding available from them. The contingency

funding plan also includes the indicators used to anticipate a liquidity crisis, the escalation process in case a crisis is foreseen, and the communication plan.

g) An explanation of how stress testing is used

Stress testing is employed to ensure that the Amalgamation always has a liquidity buffer large enough relative to net outflows. Stress testing is used to prepare for idiosyncratic and market-wide stress, as well as their combination. Stress testing guides both the maturity profile of wholesale funding and the size of the liquidity buffer.

h) A declaration approved by the management body on the adequacy of liquidity risk management arrangements of the institution providing assurance that the liquidity risk management systems put in place are adequate with regard to the institution's profile and strategy

Further details are set out in the Declaration approved by the Board of Directors of the Savings Banks Amalgamation.

i) A concise liquidity risk statement approved by the management body succinctly describing the institution's overall liquidity risk profile associated with the business strategy. This statement shall include key ratios and figures (other than those already covered in the EU LIQ1 template under this ITS) providing external stakeholders with a comprehensive view of the institution's management of liquidity risk, including how the liquidity risk profile of the institution interacts with the risk tolerance set by the management body. These ratios may include:

- **Concentration limits on collateral pools and sources of funding (both products and counterparties)**
- **Customised measurement tools or metrics that assess the structure of the bank's balance sheet or that project cash flows and future liquidity positions, taking into account off-balance sheet risks which are specific to that bank**
- **Liquidity exposures and funding needs at the level of individual legal entities, foreign branches and subsidiaries, taking into account legal, regulatory and operational limitations on the transferability of liquidity**
- **Balance sheet and off-balance sheet items broken down into maturity buckets and the resultant liquidity gaps**

Further details are set out in the Declaration approved by the Board of Directors of the Savings Banks Amalgamation.

EU LIQB – Liquidity risk management

a) Explanations on the main drivers of LCR results and the evolution of the contribution of inputs to the LCR's calculation over time

At the end of 2025, the Amalgamation had LCR-compliant liquid assets (before haircuts) amounting to EUR 1,993 (1,926) million, of which 64 (76) % were notes and coins and central bank receivables, 23 (16) % were government bonds, 12 (8) % were other liquid assets. The Amalgamation's LCR remained at a strong level of 255 (196) % at the end of 2025. The Amalgamation's twelve-month average LCR also remained robust and is disclosed in table EU LIQ1. The main drivers of the Amalgamation's LCR were the volatility of ECB exposures and maturing wholesale funding issued by the Central Bank of Savings Banks and Sp Mortgage Bank. While the LCR has remained broadly stable over 2025, changes were observed in the composition of the HQLA buffer. In particular, the proportion of HQLA-eligible bonds increased by approximately 12 percentage points in 2025 compared to 2024. The majority of HQLA assets are held in highly liquid Level 1 bonds, cash and central bank reserves.

b) Explanations on the changes in the LCR over time

The Amalgamation LCR has remained consistently above both regulatory and internal thresholds over the past 12 months. Temporal movements in the ratio are primarily driven by changes in the rollover and maturity profile of wholesale funding issued by the Central Bank of Savings Banks and Sp Mortgage Bank.

c) Explanations on the actual concentration of funding sources

The most important source of funding for the Amalgamation is retail deposits. The most important sources of wholesale funding are the unsecured funding issued under the Central Bank's EMTN program, and the covered bonds issued by Sp Mortgage Bank. The Amalgamation has established internal limits on wholesale funding and maturity concentration which form an integral part of the Amalgamation's liquidity risk management framework. The Amalgamation's diversified wholesale funding structure reduces the risk associated with funding availability and cost. Long-term funding ensures the Amalgamation's long-term funding stability and the fulfilment of regulatory requirements, such as NSFR requirements. Short-term wholesale funding completes the overall funding structure and is primarily used for balancing changes in LCR.

d) High-level description of the composition of the institution's liquidity buffer

At the end of 2025, the Amalgamation HQLA assets amounted to EUR 1,993 million and were

predominantly composed of Level 1 assets, including bonds, cash, and central bank reserves (92.2%), with smaller allocations to Level 2A (1.5%) and Level 2B assets (6.3%). This represents a slight increase compared to EUR 1,926 million as of 31 December 2024, when the HQLA assets were similarly concentrated in Level 1 assets (93.1%).

e) Derivative exposures and potential collateral calls

Derivatives are used solely for hedging purposes. The collateral needs that would result from the impact of an adverse market scenario on the Amalgamation's derivative transactions comprised approximately 5.3% of the LCR net outflows at the end of 2025, which is slightly lower than the 6.1% at the end of 2024.

f) Currency mismatch in the LCR

The Amalgamation's activities are conducted in euros, and no currency mismatches are observed in the LCR.

g) Other items in the LCR calculation that are not captured in the LCR disclosure template but that the institution considers relevant for its liquidity profile

N/A

EU LIQ1 – QUANTITATIVE INFORMATION OF LCR

Scope of consolidation: Consolidated

(EUR 1,000)		a	b	c	d	e	f	g	h
		Total unweighted value (average)				Total weighted value (average)			
EU 1a	Quarter ending on (DD Month YYY)	31 Dec 2025	30 Sep 2025	30 Jun 2025	31 March 2025	31 Dec 2025	30 Sep 2025	30 Jun 2025	31 March 2025
EU 1b	Number of data points used in the calculation of averages	12	12	12	12	12	12	12	12
High-quality liquid assets									
1	Total high-quality liquid assets (HQLA)					1,990,917	1,947,297	1,798,393	1,661,777
Cash – outflows									
2	Retail deposits and deposits from small business customers, of which:	4,855,588	4,809,578	4,757,825	4,717,771	292,036	289,028	285,518	282,944
3	Stable deposits	4,085,022	4,052,363	4,015,722	3,986,070	204,251	202,618	200,786	199,304
4	Less stable deposits	770,566	757,215	742,102	731,701	87,785	86,410	84,732	83,641
5	Unsecured wholesale funding	664,001	672,368	688,512	699,745	407,156	422,997	440,381	441,319
6	Operational deposits (all counterparties) and deposits in networks of cooperative banks	25,000	25,000	25,000	25,000	6,250	6,250	6,250	6,250
7	Non-operational deposits (all counterparties)	620,501	619,850	635,600	645,018	382,407	389,229	406,219	405,342
8	Unsecured debt	18,500	27,518	27,912	29,727	18,500	27,518	27,912	29,727
9	Secured wholesale funding								
10	Additional requirements	736,065	735,790	730,383	715,515	118,541	123,726	128,916	127,850
11	Outflows related to derivative exposures and other collateral requirements	52,744	58,357	63,877	64,622	52,744	58,357	63,877	64,622
12	Outflows related to loss of funding on debt products	28,582	28,582	28,582	27,228	28,582	28,582	28,582	27,228
13	Credit and liquidity facilities	654,738	648,850	637,924	623,664	37,214	36,786	36,457	35,999
14	Other contractual funding obligations	8,669	7,348	4,497	3,817	5,679	4,474	1,458	739
15	Other contingent funding obligations	450,298	426,198	400,480	374,181	54,965	51,140	47,144	43,078
16	TOTAL CASH OUTFLOWS					878,378	891,364	903,416	895,930
Cash – inflows									
17	Secured lending (e.g. reverse repos)								
18	Inflows from fully performing exposures	77,335	78,093	78,398	79,598	50,156	51,147	51,925	53,252
19	Other cash inflows	42,438	41,784	42,215	84,815	17,494	18,218	20,208	63,597
EU-19a	(Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies)								
EU-19b	(Excess inflows from a related specialised credit institution)								
20	TOTAL CASH INFLOWS	119,772	119,877	120,613	164,413	67,651	69,365	72,133	116,849
EU-20a	Fully exempt inflows			75,406					
EU-20b	Inflows subject to 90% cap			120,613					
EU-20c	Inflows subject to 75% cap	119,772	119,877	120,613	164,413	67,651	69,365	72,133	116,849
Total adjusted value									
EU-21	LIQUIDITY BUFFER					1,814,081	1,786,252	1,889,560	2,003,700
22	TOTAL NET CASH OUTFLOWS					810,727	821,999	831,283	779,081
23	LIQUIDITY COVERAGE RATIO					225.69%	219.31%	230.41%	292.51%

The Liquidity Coverage Ratio (LCR) is disclosed as the average of month-end observations for each quarter. The Amalgamation's funding position and liquidity profile remained strong throughout the reporting period.

EU LIQ2: NET STABLE FUNDING RATIO

		a	b	c	d	e
		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to <1yr	≥ 1yr	
31 Dec 2025 (EUR 1,000)						
Available stable funding (ASF) Items						
1	Capital items and instruments	1,350,124			1,745	1,351,869
2	Own funds	1,350,124			1,745	1,351,869
3	Other capital instruments					
4	Retail deposits		5,644,860	515,613	69,557	5,853,100
5	Stable deposits		4,466,964	315,380	39,209	4,582,435
6	Less stable deposits		1,177,897	200,233	30,348	1,270,664
7	Wholesale funding:		1,767,249	438,471	3,174,603	3,774,395
8	Operational deposits		64,661			32,331
9	Other wholesale funding		1,753,029	438,471	3,174,603	3,767,284
10 Interdependent liabilities						
11	Other liabilities:		113,123			
12	NSFR derivative liabilities	45,668				
13	All other liabilities and capital instruments not included in the above categories		113,123			
14	Total available stable funding (ASF)					10,979,364
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					84,236
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool		126,045	126,811	3,870,588	3,504,928
16 Deposits held at other financial institutions for operational purposes						
17	Performing loans and securities:		334,380	296,442	5,805,066	4,683,240
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		0	0	0	0
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		18,954	1,109	13,804	16,253
20	Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		162,720	181,877	3,155,917	2,754,815
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		34,224	36,255	500,061	360,280
22	Performing residential mortgages, of which:		95,299	101,931	2,469,965	1,734,214
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		83,072	90,830	2,319,355	1,594,532
24	Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products		57,407	11,525	165,381	177,957
25 Interdependent assets						
26	Other assets:		238,718	4,713	437,221	513,308
27	Physical traded commodities					
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		7,987	0	0	6,789
29	NSFR derivative assets		0			0
30	NSFR derivative liabilities before deduction of variation margin posted		96,482			4,824
31	All other assets not included in the above categories		134,250	4,713	437,196	502,686
32	Off-balance sheet items		518,093	20,211	617,111	92,211
33	Total RSF					8,877,924
34	Net Stable Funding Ratio (%)					123.67%

The Net Stable Funding Ratio (NSFR) requires institutions to maintain a stable funding profile in relation to the composition of their assets and off-balance sheet exposures. The NSFR is defined as the ratio of Available Stable Funding (ASF) to Required Stable Funding (RSF). In accordance with regulatory requirements, the ratio must be at least 100%. The Amalgamation's NSFR remained stable throughout 2025. At the end of December 2025 NSFR amounted to 123.7% (125.3% Dec 2024). During the reporting period, deposit and loan growth was in line with the Group's strategy. A slight decline in wholesale funding was observed, primarily reflecting upcoming maturities.

10. ASSET ENCUMBRANCE

EU AE4 – Accompanying narrative information

a) General narrative information on asset encumbrance

For the purposes of the disclosures on asset encumbrance, the Amalgamation applies the same regulatory consolidation scope as that used for the application of the liquidity requirements on a consolidated basis, as defined in Chapter 2 of Title I of Part Two of the CRR.

Collateral securities refer to the Amalgamation's assets that are used as collateral in order to fulfil liquidity needs in both normal and stress conditions. The Central Bank of Savings Banks' Treasury monitors collateral centrally and is responsible for the governance, allocation and transfer of assets used in collateralised transactions.

Home loans serving as collateral for covered bonds issued by Sp Mortgage Bank constitute the largest source of asset encumbrance on the balance sheet. Central bank operations and derivative transactions are other significant sources of encumbrance, as these transactions typically restrict the Amalgamation's ability to freely dispose of the underlying assets for the duration of the arrangement. To enhance liquidity preparedness, the Amalgamation identifies the eligibility of balance sheet receivables as collateral and maintains operational readiness to mobilise such receivables when required. For the purposes of asset encumbrance disclosures, exposure values are reported using the carrying amounts of assets. Median exposure values are calculated on the basis of regular reporting reference dates over the disclosure period, with the median representing the middle value of the observed exposures during that period.

b) Narrative information relating to the impact of the institution's business model on its level of encumbrance and the importance of encumbrance on the institution's funding model

The Amalgamation's level of asset encumbrance reflects its funding model and liquidity management practices, with encumbrance primarily arising from covered bond issuance and derivative transactions. The largest source of asset encumbrance is home loans pledged as collateral for covered bonds issued by Sp Mortgage Bank. As a result, encumbrance is

concentrated in Sp Mortgage Bank, which also predominantly drives encumbrance at the Amalgamation level. Other entities within the Amalgamation exhibit materially lower levels of encumbrance. Intragroup encumbrance arises where Savings Banks pledge assets to the Central Bank of Savings Banks, which may rehypothecate the assets, but consolidated encumbrance mainly stems from external secured funding activities. Derivative transactions contribute to encumbrance through collateral posted under margining arrangements. The Amalgamation does not issue securitisations, nor has it retained any covered bonds issued by Sp Mortgage Bank. Consequently, asset encumbrance does not arise from securitisation activities or retained covered bond positions. Sp Mortgage Bank maintains an over-collateralisation level above the legislative minimum for covered bonds, calibrated to support the AAA rating assigned by S&P Global Ratings. The Amalgamation operates exclusively in euros and therefore does not have any sources of asset encumbrance in other significant currencies. Although a substantial amount of assets is reported as unencumbered in column 060 "Carrying amount of unencumbered assets" of template EU AE1, not all unencumbered assets are available for encumbrance in the normal course of business. At least EUR 268 million (263) consist of items such as intangible assets, deferred tax assets, property and other fixed assets, and derivative assets, which are not suitable for collateral purposes.

EU AE1 – ENCUMBERED AND UNENCUMBERED ASSETS

		Carrying amount of encumbered assets		Fair value of encumbered assets		Carrying amount of unencumbered assets		Carrying amount of unencumbered assets	
		010	of which notionally eligible EHQLA and HQLA 030	040	of which notionally eligible EHQLA and HQLA 050	060	of which EHQLA and HQLA 080	090	of which EHQLA and HQLA 100
31 Dec 2025 (EUR 1,000)									
010	Assets of the disclosing institution	4,159,329	4,954			8,797,662	1,913,596		
030	Equity instruments					46,297		46,310	
040	Debt securities	4,965	4,954	4,968	4,956	861,248	595,153	862,654	596,534
050	of which: covered bonds					80,720	44,660	80,657	44,566
060	of which: securitisations								
070	of which: issued by general governments	4,954	4,954	4,956	4,956	390,343	389,788	391,678	391,124
080	of which: issued by financial corporations					260,431	78,122	260,350	78,044
090	of which: issued by non-financial corporations					210,116	131,711	210,176	131,735
120	Other assets	4,134,923				7,923,991	1,334,700		

EU AE2 – COLLATERAL RECEIVED AND OWN DEBT SECURITIES ISSUED

		Fair value of encumbered collateral received or own debt securities issued		Unencumbered	
		010	of which notionally eligible EHQLA and HQLA 030	Fair value of collateral received or own debt securities issued available for encumbrance 040	of which EHQLA and HQLA 060
31 Dec 2025 (EUR 1,000)					
130	Collateral received by the disclosing institution			18,905	
140	Loans on demand	17,215		18,905	
150	Equity instruments				
160	Debt securities				
170	of which: covered bonds				
180	of which: securitisations				
190	of which: issued by general governments				
200	of which: issued by financial corporations				
210	of which: issued by non-financial corporations				
220	Loans and advances other than loans on demand				
230	Other collateral received				
240	Own debt securities issued other than own covered bonds or securitisations				
241	Own covered bonds and securitisations issued and not yet pledged				
TOTAL COLLATERAL RECEIVED AND OWN DEBT SECURITIES ISSUED		4,159,156	4,954		

EU AE3 – SOURCES OF ENCUMBRANCE

		Matching liabilities, contingent liabilities or securities lent 010	Assets, collateral received and own debt securities issued other than covered bonds and securitisations encumbered 030
31 Dec 2025 (EUR 1,000)			
010	Carrying amount of selected financial liabilities	2,633,582	4,159,156

The Amalgamation does not report material amounts of encumbered assets or off-balance-sheet items in row 010 of template EU AE3 that are not associated with corresponding secured liabilities.

11. OPERATIONAL RISK

EU OR2 – BUSINESS INDICATOR, COMPONENTS AND SUBCOMPONENTS

(EUR 1,000)

BI and its subcomponents		a	b	c	d
		31 Dec 2025	31 Dec 2024	31 Dec 2023	Average value
1	Interest, lease and dividend component (ILDC)				263,487
EU 1	ILDC related to the individual institution/consolidated Group (excluding entities considered by Article 314(3))				263,487
1a	Interest and lease income	520,243	625,187	488,195	544,541
1b	Interest and lease expense	281,722	354,906	224,581	287,070
1c	Total assets/Asset component	13,054,315	12,576,159	11,965,305	12,531,926
1d	Dividend income/ dividend component	9,962	3,960	4,124	6,015
2	Services component (SC)				145,335
2a	Fee and commission income	143,150	131,600	125,164	133,305
2b	Fee and commission expense	13,935	12,680	11,441	12,685
2c	Other operating income	9,693	12,735	13,661	12,030
2d	Other operating expense	10,505	9,546	10,398	10,149
3	Financial component (FC)				12,593
3a	Net profit or loss applicable to trading book (TB)			38	13
3b	Net profit or loss applicable to banking book (BB)	4,827	2,244	30,670	12,580
EU 3c	Approach followed to determine the TB/BB boundary (PBA or accounting approach)				Accounting Approach
4	Business Indicator (BI)				421,415
5	Business indicator component (BIC)				50,570

Disclosure on the BI:

31 Dec 2025 (EUR 1,000)

		a
6a	BI gross of excluded divested activities	421,415
6b	Reduction in BI due to excluded divested activities	
EU 6c	Impact in BI of mergers/acquisitions	

With the introduction of CRR3, the capital requirement for operational risk has been calculated using the Standardized Approach based on the Business Indicator Component. For the Amalgamation, Interest, lease and dividend component (ILDC) explains 63% and Services Component 34% of the Business Indicator (BI). The Business Indicator Component amounts to EUR 51 million and has remained stable.

EU OR3 – OPERATIONAL RISK OWN FUNDS REQUIREMENTS AND RISK EXPOSURE AMOUNTS

31 Dec 2025 (EUR 1,000)		a
1	Business Indicator Component (BIC)	50,570
EU 1	Alternative Standardised Approach (ASA) Own Funds Requirements (OROF) under Article 314(4)	
	Minimum Required Operational Risk Own Funds Requirements (OROF)	50,570
4	Operational Risk Exposure Amounts (REA)	632,122

The Operational Risk Exposure Amount (REA) totals EUR 632 million and has decreased from the previous year's Operational Risk REA (EUR 681 million), which was calculated using the Basic Indicator Approach (BIA) preceding the implementation of CRR3. The change in the calculation methodology slightly reduced the amount of operational risk exposure.

EU ORA – Qualitative information on operational risk

(a) Disclosure of the risk management objectives and policies

Operational risks refer to the risk of loss resulting from inadequate or failed internal processes, personnel, systems, or external events. A loss may be a direct financial loss or an indirect loss, such as costs arising from corrective actions, reputational damage, sanctions, or lost revenue. Legal risks and compliance risks are included in operational risks. Strategic risks have been excluded from operational risks here.

Operational risk management aims at anticipating risk situations and maintaining the level of risk at an acceptable level. The risk appetite in different areas of operational risk may differ based on the source of the risk.

The Savings Banks Amalgamation's operations comply with the current legislation, government regulations, the rules of good banking practices as confirmed by the Finance Finland and the principles concerning the management of operational risks, along with other internal guidelines of the Savings Banks Amalgamation. Operational risks are governed by the principles of operational risk management and supporting guidelines.

(b) Disclosure of the structure and organisation of the operational risk management function

The Board of Directors of the Savings Banks Amalgamation's Central Institution has the overall

responsibility for the operational risks. The Board of Directors of the Central Institution approves the principles of operational risk management where the risk appetite and operational risk management procedures related to their identification, measurement, mitigation, monitoring and control are defined. The Risk Management and Compliance function monitors that the operational risk management framework is applied in all companies and units belonging to the Savings Banks Amalgamation. The Risk Management and Compliance function reports to the Board of Directors.

Each entity within the Savings Banks Amalgamation must identify the key operational risks associated with its business activities and define the necessary risk mitigating measures. Risks must be assessed regularly and always prior to the introduction of a new product or service. Materialised risks and near miss incidents must be reported and investigated to determine the contributing factors and root causes. Significant risks and materialised risks are reported regularly to senior management and the Board of Directors.

Through sufficient business continuity and recovery planning, the Savings Banks Amalgamation ensures that critical and important services and processes continue to function also under severe interruptions and crisis.

(c) Description of the scope and nature of the measurement system

Operational risks are processed in a system that includes incident and risk assessment processes. Measuring operational risk is based on loss data as well as the estimation of expected risk materialisation based on risk assessments. Capital requirement for operational risk is calculated with the standard method. Since the business indicator does not exceed the threshold set out in Article 316(1) of the CRR, loss data is not used in the calculation of the operational risk capital requirement.

(d) Description of the scope and nature of the operational risk reporting framework

Operational risks are reported regularly as part of risk management and compliance reporting for the Board of Directors. The reporting covers all areas of operational risks and provides a situational overview of risks and the mitigating actions taken.

(e) Description of the policies and strategies of the risk mitigation and risk hedge

As part of the risk assessment process, the level of residual risk is evaluated, and decisions are made as to whether mitigating measures and additional controls are needed. Risk acceptance can be done within the risk appetite. In addition to standardised operational risk management procedures and means of mitigating individual risks, The Amalgamation has taken insurances to transfer the impacts of materialised operational risks outside the Amalgamation.

12. OTHER PILLAR 3 DISCLOSURES

12.1. SCOPE OF APPLICATION

EU LI – DIFFERENCES BETWEEN ACCOUNTING AND REGULATORY SCOPES OF CONSOLIDATION AND MAPPING OF FINANCIAL STATEMENT CATEGORIES WITH REGULATORY RISK CATEGORIES

		a	b	c	d	e	f	g
		Carrying values as reported in published financial statements	Carrying values under scope of prudential consolidation	Carrying values of items				
				Subject to the credit risk framework	Subject to the CCR framework	Subject to the securitisation framework	Subject to the market risk framework	Not subject to own funds requirements or subject to deduction from own funds
31 Dec 2025 (EUR 1,000)								
Breakdown by asset classes according to the balance sheet in the published financial statements								
1	Cash and cash equivalents	1,280,957	1,280,957	1,280,957				
2	Loans and advances to credit institutions	160,101	159,944	159,944				
3	Loans and advances to customers	10,549,143	10,549,705	10,549,705				
4	Derivatives	16,903	16,903		16,903			
5	Investment assets	970,323	973,917	973,917			909	
6	Investments in associates and joint ventures	153	153	153				
7	Property, plant and equipment	37,385	37,342	37,342				
8	Intangible assets	86,621	85,827					85,827
9	Tax assets	19,928	19,928	11,967				7,962
10	Other assets	103,992	103,751	81,604	22,147			
11	Total assets	13,225,506	13,228,426	13,095,589	39,049		909	93,788
Breakdown by liability classes according to the balance sheet in the published financial statements								
1	Financial liabilities at fair value through profit or loss							
2	Liabilities to credit institutions	344,574	344,574					344,574
3	Liabilities to customers	7,163,384	7,164,799					7,164,799
4	Derivatives	91,414	91,414		91,414			
5	Debt securities issued	4,022,671	4,022,671					4,022,671
6	Subordinated liabilities	3,173	3,173					3,173
7	Tax liabilities	63,879	63,868					63,868
8	Provisions and other liabilities	178,150	177,526		25,958			151,568
9	Total liabilities	11,867,245	11,868,025		117,372			11,750,653

Table EU LI1 provides information on the differences between the main items of the Savings Banks Group's (column a) and the Savings Banks Amalgamation's (column b) balance sheet and the allocation of the items into the risk framework (columns c–g). Column b does not always equal the sum of columns c–g because some items are subject to both credit risk and market risk capital requirement (FX risk).

EU L1A – Explanations of differences between accounting and regulatory exposure amounts

a) Differences between columns a and b in template EU L1

The differences between the balance sheets of the Savings Banks Group and the Savings Banks Amalgamation are due to minor differences in the content of consolidation. The coverage of the Savings Banks Group differs from that of the Savings Banks Amalgamation in that the Savings Banks Group also includes institutions other than credit and financial institutions or service companies. The most notable of these is Sp-Koti Oy. The Savings Banks Amalgamation has applied the materiality threshold specified in Article 19 of the CRR in the consolidation of its companies.

b) Qualitative information on the main sources of differences between the accounting and regulatory scope of consolidation shown in template EU L12

Table EU L2 discloses the main differences between the carrying values in the Savings Banks Group's financial statement and regulatory exposure amounts in the capital adequacy calculation of the Savings Banks Amalgamation. In the table, column a does not always equal the sum of columns b–e because some of the balance sheet items are subject to more than one risk framework.

EU L12 – MAIN SOURCES OF DIFFERENCES BETWEEN REGULATORY EXPOSURE AMOUNTS AND CARRYING VALUES IN FINANCIAL STATEMENTS

31 Dec 2025 (EUR 1,000)		a	b	c	d	e
		Total	Items subject to			
			Credit risk framework	Securitisation framework	CCR framework	Market risk framework
1	Assets carrying value amount under the scope of prudential consolidation (as per template L11)	13,134,638	13,095,589		39,049	909
2	Liabilities carrying value amount under the scope of prudential consolidation (as per template L11)	117,372			117,372	
3	Total net amount under the scope of prudential consolidation	13,017,267	13,095,589		-78,322	909
4	Off-balance-sheet amounts	500	500			
5	<i>Differences in valuations</i>	-743	-743			
6	<i>Differences due to different netting rules, other than those already included in row 2</i>					
7	<i>Differences due to consideration of provisions</i>					
8	<i>Differences due to the use of credit risk mitigation techniques (CRMs)</i>	-73,285	-59,790		-13,495	
9	<i>Differences due to credit conversion factors</i>	20,597	20,597			
10	<i>Differences due to Securitisation with risk transfer</i>					
11	<i>Other differences</i>	-12,678,477	-12,799,145		120,668	
12	Exposure amounts considered for regulatory purposes	285,857	257,007		28,850	

EU LI3 – OUTLINE OF THE DIFFERENCES IN THE SCOPES OF CONSOLIDATION (ENTITY BY ENTITY)

31 Dec 2025

a	b	c	d	e	f	g	h
Name of the entity	Method of accounting consolidation	Method of prudential consolidation					Description of the entity
		Full consolidation	Proportional consolidation	Equity method	Neither consolidated nor deducted	Deducted	
Länsi-Uudenmaan Säästöpankki	Full consolidation	x					Credit institution
Ekenäs Sparbank	Full consolidation	x					Credit institution
Myrskylän Säästöpankki	Full consolidation	x					Credit institution
Helmi Säästöpankki Oy	Full consolidation	x					Credit institution
Lammin Säästöpankki	Full consolidation	x					Credit institution
Someron Säästöpankki	Full consolidation	x					Credit institution
Säästöpankki Kalanti-Pyhäranta	Full consolidation	x					Credit institution
Nooa Säästöpankki Oy	Full consolidation	x					Credit institution
Säästöpankki Sinetti	Full consolidation	x					Credit institution
Aito Säästöpankki Oy	Full consolidation	x					Credit institution
Säästöpankki Optia	Full consolidation	x					Credit institution
Avain Säästöpankki	Full consolidation	x					Credit institution
Kvevlax Sparbank	Full consolidation	x					Credit institution
Närpiön Säästöpankki Oy	Full consolidation	x					Credit institution
Säästöpankkien Keskuspankki Suomi Oy	Full consolidation	x					Credit institution
Sp-Kiinnitysluottopankki Oyj	Full consolidation	x					Credit institution
Sp-rahastoyhtiö Oy	Full consolidation	x					Fund management company
Säästöpankkipalvelut Oy	Full consolidation	x					Service company
Säästöpankkiliitto osk	Full consolidation	x					Central body of the amalgamation
Fast Ab Kvevlax Affärshus Koivulahti	Full consolidation	x					Real estate company
Sp-Isännöintipalvelu Oy	Full consolidation					x	Real estate management company
Figure Taloushallinto Oy	Equity method			x			Associated company
Sp-Koti Oy	Full consolidation					x	Real estate agent service company
Säästöpankkien Holding Oy	Full consolidation					x	Holding company
Urbaanit kodit Oy	Full consolidation					x	Real estate agent service company

Table EU LI3 provides information on the entities that are included in the accounting scope of consolidation (the Savings Banks Group) and/or prudential scope of consolidation (the Savings Banks Amalgamation). The method used in the accounting scope of consolidation is disclosed in column b, and the prudential scope of consolidation is disclosed in column c. The entities which are only part of the Savings Banks Group but not the Amalgamation can be identified based on column f.

EU LIB – Other qualitative information on the scope of application

a) Impediment to the prompt transfer of own funds or to the repayment of liabilities within the group

N/A

b) Subsidiaries not included in the consolidation with own funds less than required

N/A

c) Use of derogation referred to in Article 7 CRR or individual consolidation method laid down in Article 9 CRR

N/A

d) Aggregate amount by which the actual own funds are less than required in all subsidiaries that are not included in the consolidation

N/A

EU PV1 – PRUDENT VALUATION ADJUSTMENTS (PVA)

31 Dec 2025 (EUR 1,000)		a	b	c	d	e	EU e1	EU e2	f	g	h
		Risk category					Category level AVA - Valuation uncertainty		Total category level post-diversification	Of which: Total core approach in the trading book	Of which: Total core approach in the banking book
Category level AVA	Equity	Interest Rates	Foreign exchange	Credit	Commodities	Unearned credit spreads AVA	Investment and funding costs AVA				
12	Total Additional Valuation Adjustments (AVAs)								743		

Rows 1–11 are not disclosed as there is no reporting in these rows.

12.2. OWN FUNDS

EU CC1 – COMPOSITION OF REGULATORY OWN FUNDS

		(a)	(b)
		Amounts	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
31 Dec 2025 (EUR 1,000)			
Common Equity Tier 1 (CET1) capital: instruments and reserves			
1	Capital instruments and the related share premium accounts	86,160	(h)
	of which: Shares	40,313	a
	of which: Primary capital	45,835	b
	of which: Share premium accounts	12	c
2	Retained earnings	647,884	d
3	Accumulated other comprehensive income (and other reserves)	529,949	c
EU-5a	Independently reviewed interim profits net of any foreseeable charge or dividend	86,131	d
6	Common Equity Tier 1 (CET1) capital before regulatory adjustments	1,350,124	
Common Equity Tier 1 (CET1) capital: regulatory adjustments			
7	Additional value adjustments (negative amount)	-743	
8	Intangible assets (net of related tax liability) (negative amount)	-85,827	e
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)	-2,083	
27a	Other regulatory adjustments	-7,038	
28	Total regulatory adjustments to Common Equity Tier 1 (CET1)	-95,690	
29	Common Equity Tier 1 (CET1) capital	1,254,434	
Additional Tier 1 (AT1) capital: instruments			
36	Additional Tier 1 (AT1) capital before regulatory adjustments		
Additional Tier 1 (AT1) capital: regulatory adjustments			
43	Total regulatory adjustments to Additional Tier 1 (AT1) capital		
44	Additional Tier 1 (AT1) capital		
45	Tier 1 capital (T1 = CET1 + AT1)	1,254,434	

		(a)	(b)
		Amounts	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
31 Dec 2025 (EUR 1,000)			
Tier 2 (T2) capital: instruments			
46	Capital instruments and the related share premium accounts	1,745	h
51	Tier 2 (T2) capital before regulatory adjustments	1,745	
Tier 2 (T2) capital: regulatory adjustments			
58	Tier 2 (T2) capital	1,745	
59	Total capital (TC = T1 + T2)	1,256,179	
60	Total Risk exposure amount	5,531,347	
Capital ratios and requirements including buffers			
61	Common Equity Tier 1 capital	22.68%	
62	Tier 1 capital	22.68%	
63	Total capital	22.71%	
64	Institution CET1 overall capital requirements	8.86%	
65	of which: capital conservation buffer requirement	2.50%	
66	of which: countercyclical capital buffer requirement	0.02%	
67	of which: systemic risk buffer requirement	1.00%	
EU-67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer requirement	0.00%	
EU-67b	of which: additional own funds requirements to address the risks other than the risk of excessive leverage	0.84%	
68	Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements	13.21%	
Amounts below the thresholds for deduction (before risk weighting)			
72	Direct and indirect holdings of own funds and eligible liabilities of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	3,329	i
73	Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 17.65% thresholds and net of eligible short positions)	911	i
75	Deferred tax assets arising from temporary differences (amount below 17,65% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met)	7,962	
Applicable caps on the inclusion of provisions in Tier 2			
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach	60,966	

Rows EU-3a-5, 11–27, 30–35, 37–44, 47–50, 52–57, 69–71, 74, 76, 78–85 are not disclosed because there is no reporting on these rows.

EU CC2 – RECONCILIATION OF REGULATORY OWN FUNDS TO BALANCE SHEET IN THE AUDITED FINANCIAL STATEMENTS

		a	b	c
		Balance sheet as in published financial statements	Under regulatory scope of consolidation	Reference
31 Dec 2025 (EUR 1,000)		As at period end	As at period end	
Assets – Breakdown by asset classes according to the balance sheet in the published financial statements				
1	Cash and cash equivalents	1,280,957	1,280,957	
2	Loans and advances to credit institutions	160,101	159,944	
3	Loans and advances to customers	10,549,143	10,549,705	
4	Derivatives	16,903	16,903	
5	Investment assets	970,323	973,917	(i)
9	Investments in associates and joint ventures	153	153	
10	Property, plant and equipment	37,385	37,342	
11	Intangible assets	86,621	85,827	(e)
12	Tax assets	19,928	19,928	
	ow: deferred tax assets	10,044	10,044	(g)
13	Other assets	103,992	103,751	
14	Total assets	13,225,506	13,228,426	
Liabilities – Breakdown by liability classes according to the balance sheet in the published financial statements				
1	Liabilities to credit institutions	344,574	344,574	
2	Liabilities to customers	7,163,384	7,164,799	
3	Derivatives	91,414	91,414	
4	Debt securities issued	4,022,671	4,022,671	
5	Subordinated liabilities	3,173	3,173	
	ow: Tier 2 eligible subordinated liabilities	1,745	1,745	(h)
6	Tax liabilities	63,879	63,868	
7	Provisions and other liabilities	178,150	177,526	
12	Total liabilities	11,867,245	11,868,025	
Shareholders' Equity				
1	Basic capital	40,217	40,334	(c)
2	Primary capital	46,202	46,202	(b)
3	Reserves	530,303	529,940	(c)
	ow: cash flow hedges			(f)
4	Retained earnings	741,300	743,639	(d)
5	Total equity attributable to equity holders of the Group	1,358,023	1,233,226	
6	Non-controlling interests	239	286	
7	Total equity	1,358,261	1,360,402	

EU CCA: MAIN FEATURES OF REGULATORY OWN FUNDS INSTRUMENTS AND ELIGIBLE LIABILITIES INSTRUMENTS

31 Dec 2025 (EUR 1,000)		i. Instruments meeting own funds requirements		
		Share capital	Basic fund	Debentures, maturity > 1 year
1	Issuer	Member Savings Banks	Member Savings Banks	Someron Säästöpankki
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	N/A	N/A	FI000556402
2a	Public or private placement	Private	Private	Private
3	Governing law(s) of the instrument	Legislation of Finland	Legislation of Finland	Legislation of Finland
3a	Contractual recognition of write down and conversion powers of resolution authorities	N/A	N/A	N/A
	<i>Regulatory treatment</i>			
4	Current treatment taking into account, where applicable, transitional CRR rules	Common Equity Tier 1	Common Equity Tier 1	Tier 2
5	Post-transitional CRR rules	Common Equity Tier 1	Common Equity Tier 1	Tier 2
6	Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated	Solo and (Sub-) Consolidated	Solo and (Sub-) Consolidated	Solo and (Sub-) Consolidated
7	Instrument type (types to be specified by each jurisdiction)	Share	Basic fund share	Liability 63 art.
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	40,334	46,202	Regulatory own funds: 1,745 Eligible liabilities: 3,173
9	Nominal amount of instrument	N/A	46,202	3,173
EU-9a	Issue price	N/A	100%	100%
EU-9b	Redemption price	N/A	100%	100%
10	Accounting classification	Shareholders' equity	Shareholders' equity	Liability – amortised cost
11	Original date of issuance	Share capital of every Savings bank in form of limited liability company has individual date of issuance	Every basic fund emission has individual date of issuance	30.6.2023
12	Perpetual or dated	Perpetual	Perpetual	Dated
13	Original maturity date	No maturity	No maturity	30.9.2028
14	Issuer call subject to prior supervisory approval	No	No	No
15	Optional call date, contingent call dates and redemption amount	N/A	N/A	N/A
16	Subsequent call dates, if applicable	N/A	N/A	N/A

31 Dec 2025 (EUR 1,000)		i. Instruments meeting own funds requirements		
		Share capital	Basic fund	Debentures, maturity > 1 year
	<i>Coupons / dividends</i>			
17	Fixed or floating dividend/coupon	Floating	Floating	Floating
18	Coupon rate and any related index	N/A	N/A	2.323% / Euribor 12
19	Existence of a dividend stopper	No	No	No
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Fully discretionary	Fully discretionary	Mandatory
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Fully discretionary	Fully discretionary	Mandatory
21	Existence of step up or other incentive to redeem	No	No	No
22	Noncumulative or cumulative	Noncumulative	Noncumulative	Noncumulative
23	Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible
24	If convertible, conversion trigger(s)	N/A	N/A	N/A
25	If convertible, fully or partially	N/A	N/A	N/A
26	If convertible, conversion rate	N/A	N/A	N/A
27	If convertible, mandatory or optional conversion	N/A	N/A	N/A
28	If convertible, specify instrument type convertible into	N/A	N/A	N/A
29	If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A
30	Write-down features	No	No	No
31	If write-down, write-down trigger(s)	N/A	N/A	N/A
32	If write-down, full or partial	N/A	N/A	N/A
33	If write-down, permanent or temporary	N/A	N/A	N/A
34	If temporary write-down, description of write-up mechanism	N/A	N/A	N/A
34a	Type of subordination (only for eligible liabilities)	N/A	N/A	Statutory
EU-34b	Ranking of the instrument in normal insolvency proceedings	Rank 1	Rank 1	Rank 3
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Debentures	Debentures	Subordinated unsecured debt
36	Non-compliant transitioned features	No	No	No
37	If yes, specify non-compliant features	N/A	N/A	N/A
37a	Link to the full term and conditions of the instrument (signposting)	N/A	N/A	www.saastopankki.fi/fi-fi/pankit-ja-konttorit/someron-saastopankki/debentuuri
(1) Insert 'N/A' if the question is not applicable				

Table EU CCA discloses information on the main features of the own funds instruments. Regarding MREL instruments, only debentures are included, because other MREL instruments are not in the scope of disclosure requirements according to the CRR (Article 437 and 437a).

12.3. COUNTERCYCLICAL CAPITAL BUFFERS

EU CCYB1 – GEOGRAPHICAL DISTRIBUTION OF CREDIT EXPOSURES RELEVANT FOR THE CALCULATION OF THE COUNTERCYCLICAL BUFFER

31 Dec 2025 (EUR 1,000)		a	f	g	j	k	l	m
		General credit exposures	Total exposure value	Own fund requirements		Risk-weighted exposure amounts	Own fund requirements weights (%)	Countercyclical buffer rate (%)
		Exposure value under the standardised approach		Relevant credit risk exposures – Credit risk	Total			
010	Breakdown by country:							
020	Denmark	11,148	11,148	566	566	7,080	0.15%	2.50%
030	Iceland	344	344	12	12	149	0.00%	2.50%
030	Norway	29,624	29,624	332	332	4,145	0.09%	2.50%
040	Sweden	34,428	34,428	1,675	1,675	20,941	0.44%	2.00%
050	Estonia	11,918	11,918	234	234	2,922	0.06%	1.50%
060	Ireland	777	777	32	32	396	0.01%	1.50%
070	Slovakia	595	595	5	5	59	0.00%	1.50%
080	Czechia	735	735	44	44	553	0.01%	1.25%
090	Belgium	2,154	2,154	68	68	850	0.02%	1.00%
100	Cyprus	98	98	2	2	21	0.00%	1.00%
110	France	28,160	28,160	732	732	9,144	0.19%	1.00%
120	Hungary	31	31	1	1	9	0.00%	1.00%
130	Lithuania	45	45	1	1	16	0.00%	1.00%
140	Poland	177	177	9	9	115	0.00%	1.00%
150	Germany	9,985	9,985	463	463	5,783	0.12%	0.75%
160	Spain	9,071	9,071	439	439	5,487	0.11%	0.50%
170	Luxembourg	10,316	10,316	659	659	8,238	0.17%	0.50%
180	Other	10,310,292	10,310,292	378,038	378,038	4,725,477	98.61%	0.00%
	Total	10,461,142	10,461,142	383,358	383,358	4,791,973	100.00%	

The columns b-e, h and i are not disclosed because there is no reporting in these columns.

EU CCYB2 – AMOUNT OF INSTITUTION-SPECIFIC COUNTERCYCLICAL CAPITAL BUFFER

31 Dec 2025 (EUR 1,000)		a
1	Total risk exposure amount	5,531,347
2	Institution specific countercyclical capital buffer rate	0.02%
3	Institution specific countercyclical capital buffer requirement	1,123

12.4. LEVERAGE RATIO

EU LRA – LR qualitative information

a) Description of the processes used to manage the risk of excessive leverage

The leverage ratio describes the level of indebtedness of a credit institution and is calculated by dividing the original own funds by total liabilities. The Savings Banks Amalgamation monitors leverage ratio as part of ALM and the internal capital adequacy assessment process in baseline

and stress scenarios. The Savings Banks Amalgamation has set an internal follow-up level for the leverage ratio in the capital contingency plan.

b) Description of the factors that had an impact on the leverage ratio during the period to which the disclosed leverage ratio refers

The leverage ratio of the Savings Banks Amalgamation increased and was 9.4% (8.9%) clearly exceeding the 3% minimum requirement. The higher ratio was particularly due to tier 1 capital increase.

EU LR1 – LRSUM: SUMMARY RECONCILIATION OF ACCOUNTING ASSETS AND LEVERAGE RATIO EXPOSURES

31 Dec 2025 (EUR 1,000)		Applicable amount
1	Total assets as per published financial statements	13,225,506
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	2,920
3	(Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	
4	(Adjustment for temporary exemption of exposures to central banks (if applicable))	
5	(Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the total exposure measure in accordance with point (i) of Article 429a(1) CRR)	
6	Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	
7	Adjustment for eligible cash pooling transactions	
8	Adjustment for derivative financial instruments	34,112
9	Adjustment for securities financing transactions (SFTs)	
10	Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	237,368
11	(Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	
EU-11a	(Adjustment for exposures excluded from the total exposure measure in accordance with point (c) and point (ca) of Article 429a(1) CRR)	
EU-11b	(Adjustment for exposures excluded from the total exposure measure in accordance with point (j) of Article 429a(1) CRR)	
12	Other adjustments	-119,080
	Total exposure measure	13,380,826

The rows 3–7, 9 and 11, 11a and 11b are not disclosed as there is no reporting in these rows.

EU LR2 – LRCOM: LEVERAGE RATIO COMMON DISCLOSURE

(EUR 1,000)		CRR leverage ratio exposures	
		a	b
		31 Dec 2025	31 Dec 2024
On-balance sheet exposures (excluding derivatives and SFTs)			
1	On-balance sheet items (excluding derivatives, SFTs, but including collateral)	13,178,463	12,656,158
6	(Asset amounts deducted in determining Tier 1 capital)	-86,038	-59,471
7	Total on-balance sheet exposures (excluding derivatives and SFTs)	13,092,425	12,596,688
Derivative exposures			
8	Replacement cost associated with SA-CCR derivatives transactions (ie net of eligible cash variation margin)	16,752	16,258
9	Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	34,281	39,827
13	Total derivatives exposures	51,034	56,085
Securities financing transaction (SFT) exposures			
18	Total securities financing transaction exposures		
Other off-balance sheet exposures			
20	(Adjustments for conversion to credit equivalent amounts)	237,368	231,066
22	Off-balance sheet exposures	237,368	231,066
Excluded exposures			
Capital and total exposure measure			
23	Tier 1 capital	1,254,434	1,146,126
24	Total exposure measure	13,380,826	12,883,839
Leverage ratio			
25	Leverage ratio (%)	9.37%	8.90%
EU-25	Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	9.37%	8.90%
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) (%)	9.37%	8.90%
26	Regulatory minimum leverage ratio requirement (%)	3.00%	3.00%
EU-26a	Additional own funds requirements to address the risk of excessive leverage (%)	0.00%	0.00%
EU-26b	of which: to be made up of CET1 capital	0.00%	0.00%
27	Leverage ratio buffer requirement (%)	0.00%	0.00%
EU-27a	Overall leverage ratio requirement (%)	3.00%	3.00%
Choice on transitional arrangements and relevant exposures			
EU-27b	Choice on transitional arrangements for the definition of the capital measure	NA	

(EUR 1,000)		CRR leverage ratio exposures	
		a	b
		31 Dec 2025	31 Dec 2024
Disclosure of mean values			
30	Total exposure measure (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	13,380,826	12,883,839
30a	Total exposure measure (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	13,380,826	12,883,839
31	Leverage ratio (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	9.37%	8.90%
31a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	9.37%	8.90%

Rows 2–5, EU-9a-12, EU-22a-EU22m, 28–29 are not disclosed because there is no reporting on these rows.

EU LR3 – LRSPL: SPLIT-UP OF ON BALANCE SHEET EXPOSURES (EXCLUDING DERIVATIVES, SFTS AND EXEMPTED EXPOSURES)

31 Dec 2025 (EUR 1,000)		a
		CRR leverage ratio exposures
EU-1	Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	13,178,463
EU-2	Trading book exposures	
EU-3	Banking book exposures, of which:	13,178,463
EU-4	Covered bonds	127,007
EU-5	Exposures treated as sovereigns	1,795,970
EU-6	Exposures to regional governments, MDB, international organisations and PSE, not treated as sovereigns	12,406
EU-7	Institutions	235,314
EU-8	Secured by mortgages of immovable properties	9,667,350
EU-9	Retail exposures	531,463
EU-10	Corporates	325,390
EU-11	Exposures in default	243,815
EU-12	Other exposures (eg equity, securitisations, and other non-credit obligation assets)	239,749

12.5. MREL-REQUIREMENT

According to the Financial Stability Authority's decision, the MREL requirement applied to the Savings Banks Amalgamation is 20.87% of the total risk exposure amount or 7.80% of the total exposures, whichever is higher. Own funds and eligible liabilities as a percentage of the total risk exposure amount (TREA) were 38.6% and own funds and eligible liabilities as a percentage of the total exposure amount (TEM) were 16.0%. 58.9% of own funds and eligible liabilities consisted of own funds and subordinated liabilities. The tables below (EU KM2, EU TLAC1 and EU TLAC3b) display key information related to the minimum requirement for own funds and eligible liabilities based on Commission Implementing Regulation 2021/763.

The MREL requirement for Sp Mortgage Bank Plc is 15.75% of the total risk amount or 5.92% of the total exposures, whichever is higher. The Pillar 3 disclosure regarding the MREL requirement applied to Sp Mortgage Bank Plc is available in Sp Mortgage Bank's half-annual report and board of directors' report and IFRS financial statements.

In addition to the requirement calculated on the basis of overall risk, the institution-specific capital buffer requirement must be met on an ongoing basis. The MREL requirement is by nature a Pillar 2 type minimum requirement that must be met continuously.

The MREL requirement does not apply to the member credit institutions or the Central Bank of Savings Banks.

EU KM2 – KEY METRICS – MREL AND, WHERE APPLICABLE, G-SII REQUIREMENT FOR OWN FUNDS AND ELIGIBLE LIABILITIES

		a
		Minimum requirement for own funds and eligible liabilities (MREL)
		31 Dec 2025
(EUR 1,000)		
Own funds and eligible liabilities, ratios and components		
1	Own funds and eligible liabilities	2,135,903
EU-1a	Of which own funds and subordinated liabilities	1,257,644
2	Total risk exposure amount of the resolution group (TREA)	5,531,347
3	Own funds and eligible liabilities as a percentage of the TREA	38.61%
EU-3a	Of which own funds and subordinated liabilities	22.73%
4	Total exposure measure (TEM) of the resolution group	13,380,826
5	Own funds and eligible liabilities as percentage of the TEM	15.96%
EU-5a	Of which own funds or subordinated liabilities	9.39%
Minimum requirement for own funds and eligible liabilities (MREL)		
EU-7	MREL expressed as a percentage of the TREA	20.87%
EU-8	Of which to be met with own funds or subordinated liabilities	0
EU-9	MREL expressed as a percentage of the TEM	7.80%
EU-10	Of which to be met with own funds or subordinated liabilities	0

Rows 6a–6c and columns b–f are not disclosed as they are not part of the disclosure requirement.

EU TLAC1 – COMPOSITION – MREL AND, WHERE APPLICABLE, G-SII REQUIREMENT FOR OWN FUNDS AND ELIGIBLE LIABILITIES

		a
		Minimum requirement for own funds and eligible liabilities (MREL)
31 Dec 2025 (EUR 1,000)		
Own funds and eligible liabilities and adjustments		
1	Common Equity Tier 1 capital (CET1)	1,254,434
2	Additional Tier 1 capital (AT1)	0
6	Tier 2 capital (T2)	1,745
11	Own funds for the purpose of Articles 92a of Regulation (EU) No 575/2013 and 45 of Directive 2014/59/EU	1,256,179
Own funds and eligible liabilities: Non-regulatory capital elements		
12	Eligible liabilities instruments issued directly by the resolution entity that are subordinated to excluded liabilities (not grandfathered)	0
EU-12a	Eligible liabilities instruments issued by other entities within the resolution group that are subordinated to excluded liabilities (not grandfathered)	0
EU-12b	Eligible liabilities instruments that are subordinated to excluded liabilities issued prior to 27 June 2019 (subordinated grandfathered)	0
EU-12c	Tier 2 instruments with a residual maturity of at least one year to the extent they do not qualify as Tier 2 items	1,466
13	Eligible liabilities that are not subordinated to excluded liabilities (not grandfathered pre-cap)	878,259
EU-13a	Eligible liabilities that are not subordinated to excluded liabilities issued prior to 27 June 2019 (pre-cap)	0
14	Amount of non subordinated eligible liabilities instruments, where applicable after application of Article 72b (3) CRR	878,259
17	Eligible liabilities items before adjustments	879,724
EU-17a	Of which subordinated liabilities items	1,466
Own funds and eligible liabilities: Adjustments to non-regulatory capital elements		
18	Own funds and eligible liabilities items before adjustments	2,135,903
20	(Deduction of investments in other eligible liabilities instruments)	0
22	Own funds and eligible liabilities after adjustments	2,135,903
EU-22a	Of which: own funds and subordinated liabilities	1,257,644
Risk-weighted exposure amount and leverage exposure measure of the resolution group		
23	Total risk exposure amount (TREA)	5,531,347
24	Total exposure measure (TEM)	13,380,826
Ratio of own funds and eligible liabilities		
25	Own funds and eligible liabilities as a percentage of TREA	38.61%
EU-25a	Of which own funds and subordinated liabilities	22.73%
26	Own funds and eligible liabilities as a percentage of TEM	15.96%
EU-26a	Of which own funds and subordinated liabilities	9.39%
27	CET1 (as a percentage of the TREA) available after meeting the resolution group's requirements	17.74%

Rows 3–5, 7–8, 15, 16, 19, 21 and 28–EU-32 and columns b–c are not disclosed as they are not part of the disclosure requirement.

EU TLAC3B: CREDITOR RANKING – RESOLUTION ENTITY

31 Dec 2025 (EUR 1,000)		Insolvency ranking				Sum of 1 to n
		1 (most junior)	3	4	9 (most senior)	
1	Description of insolvency rank	Common Equity Tier 1 Capital	Tier 2 Capital	Subordinated liabilities	Senior Unsecured Liabilities	
5	Own funds and liabilities potentially eligible for meeting MREL	1,254,434	1,745	1,466	878,259	2,135,903
6	of which residual maturity ≥ 1 year < 2 years				422,500	422,500
7	of which residual maturity ≥ 2 year < 5 years		1,745	1,466	226,184	229,394
8	of which residual maturity ≥ 5 years < 10 years				195,928	195,928
9	of which residual maturity ≥ 10 years, but excluding perpetual securities				33,646	33,646
10	of which perpetual securities	1,254,434				1,254,434

Rows 2–4 are not disclosed as they are not part of the disclosure requirement.

12.6. INFORMATION ON GOVERNANCE ARRANGEMENTS

EU OVB – Disclosure on governance arrangements

a) The number of directorships held by members of the management body

The members of the Savings Banks Amalgamation's management bodies hold a limited number of directorships in accordance with Article 91 CRD. Directorships include positions within the Savings Banks Amalgamation entities and other group companies. The governing bodies of the Amalgamation, including the Board of Directors of the Savings Banks Amalgamation and the Central Bank of Savings Banks Finland Plc, monitor compliance with fitness and propriety as well as restrictions on the number of directorships.

Board of Directors members	Function	Executive Directorships (Group)	Non-Executive Directorships (Group)	Non-Executive Directorships (Non-Group)	Total Directorships
Robin Lindahl	Chair		1	9	10
Heikki Paasonen	Vice Chair	1	1	1	3
Pirkko Ahonen	Member	1	1		2
Tuula Heikkinen	Member		1		1
Eero Laesterä	Member		1	6	7
Simo Leisti	Member		1	3	4
Monika Mangs	Member	1	1		2
Veli-Pekka Mattila	Member		2	3	5
Petri Siviranta	Member	1	1	2	4
Hannu Syvänen	Member	1	1		2

b) Information regarding the recruitment policy for the selection of members of the management body and their actual knowledge, skills and expertise

Board of Directors

The highest decision-making authority in the Savings Banks' Union Coop (hereinafter the "Central Institution") is vested in the members participating in the general meeting. The general

meeting elects the members of the Board of Directors for the term extending until the next ordinary general meeting.

According to the rules of Savings Banks' Union Coop, the Board of Directors consists of six to ten members. The annual general meeting of the cooperative selects the members for a term of one year. The Chairman and the Vice Chairman are appointed in the organising meeting of the Board of Directors.

The Board of Directors consists primarily of the professional directors or board members of savings banks. The composition of the Board of Directors ensures the representation of Swedish-speaking banks and banks of different sizes, taking into account the responsibility of the member banks of the Amalgamation and the willingness and ability of members to promote the competitiveness of the individual banks as well as the entire Amalgamation.

The Board of Directors must comply with the regulation set by the Credit Institutions Directive, the Act on Credit Institutions, the European Banking Authority and the Finnish Financial Supervisory Authority regarding fit and proper assessments and independence requirements as far as they are applicable to the Amalgamation's Central Institution. Each member of the Board of Directors must present enough accurate information to the Board so that their suitability and independence can be assessed and notify the Board of any changes in such information. Both genders must be represented on the Board of Directors. The Amalgamation applies a structured recruitment and suitability assessment policy aimed at ensuring that members of the Board of Directors collectively possess adequate knowledge, skills, and experience relevant to the Amalgamation's business model and risk profile.

The members of the Savings Banks Amalgamation's management bodies hold a limited number of directorships in accordance with Article 91 of the Credit Institutions Directive. Members of the Board of Directors are expected to only participate in boards of other entities to such an extent that it does not, as evaluated by the Board of Directors, prevent the member from spending enough time and focusing on the matters of the Central Institution to a sufficient degree. The memberships of boards of directors in entities belonging to the Savings Banks Amalgamation are considered as one membership in this respect.

In 2025, the members of the Board of Directors were as follows:

Robin Lindahl, born 1964, (independent of savings banks), Chairman and Member of the Board
Pirkko Ahonen, born 1964, (Aito Säästöpankki Oy), Member of the Board
Heikki Paasonen, born 1974, (Säästöpankki Optia Oy), Member of the Board and Vice Chairman
Monica Mangs, born 1969, (Närpiön Säästöpankki Oy), Member of the Board

Petri Siviranta, born 1981, (Someron Säästöpankki), Member of the Board
Tuula Heikkinen, born 1969, (independent of savings banks), Member of the Board
Eero Laesterä, born 1963, (independent of savings banks), Member of the Board
Hannu Syvänen, born 1965, (Säästöpankki Sinetti), Member of the Board
Simo Leisti, born 1978, (independent of savings banks), Member of the Board
Veli-Pekka Mattila, born 1961, (Länsi-Uusimaan Säästöpankki Oy), Member of the Board

The members of the Board are CEOs or board members of savings banks, with the exception of Robin Lindahl, Tuula Heikkinen, Eero Laesterä and Simo Leisti, who are board members independent of savings banks.

The Board of Directors is tasked with leading the operations of the Central Institution in accordance with the Cooperatives Act, the Act on the Amalgamation of Deposit Banks and the governance policies of the Central Institution. The Board of Directors is responsible for the management of the Amalgamation, formulating the strategy of the Savings Banks Amalgamation and developing intra-group collaboration.

The Board of Directors has approved an agenda that specifies the duties and meeting practices of the Board of Directors.

c) Information on the diversity policy with regard of the members of the management body

The Board of Directors has approved diversity principles aimed at ensuring that the Board has, in order to perform its duties, sufficient and versatile competence and experience of the credit institution business and the risks involved. The composition of the Board and the selection of new member candidates are planned with a long-term view to ensure that the goals set out in the applicable legislation and directives are achieved and that the necessary competencies are represented in the Board of Directors. The Nomination Committee assesses the size, composition and management of duties of the Board regularly and at least annually and may give recommendations concerning changes. The Board of Directors assesses the competence, skills and experience of Board members and the entire Board regularly and at least annually by means of self-assessment. In 2025, approximately 30% of the Board members were women.

d) Information whether or not the institution has set up a separate risk committee and the frequency of the meetings

The Risk Committee assists the Board of Directors of Savings Banks' Union Coop in matters concerning risk strategies and risk-taking and monitoring that the Savings Banks Amalgamation complies with the risk strategies as approved by the Board of Directors of Savings Banks'

Union Coop. The Risk Committee monitors and ensures the efficiency and adequacy of the capital adequacy management process within the Savings Banks Amalgamation and evaluates the adequacy of the policies, controls and processes related to these risks. The Committee also assists the Remuneration Committee in creating healthy compensation systems.

In 2025, the Risk Committee convened eleven (11) times. The Committee's members maintained an average attendance rate of 100%.

e) Description on the information flow on risk to the management body

The Savings Banks Amalgamation has established a structured process for providing risk information to the management body. Risk disclosures are delivered to the management body on a regular basis through monthly reporting by the Risk Committee and periodic reporting by the Asset and Liability Committee, supplemented by ad hoc updates in the event of material risk developments or breaches of risk limits. The scope of the information provided covers all material risk categories, including credit, market, liquidity, insurance and operational risks, as well as assessments of capital adequacy, limit utilisation, stress testing results, and key compliance and internal control findings. The content and structure of these disclosures are defined under the risk strategy and reporting framework approved by the management body, which actively participates in determining the risk metrics, thresholds, and qualitative insights required to ensure adequate oversight of the institution's risk profile. Reporting is consolidated by the Central Institution to ensure completeness, accuracy, and consistency, enabling the management body to exercise its supervisory responsibilities and to make informed decisions regarding risk appetite, capital planning, and the overall risk management framework.

12.7. REMUNERATION

Pillar 3 disclosures on remuneration are disclosed in the Savings Banks Amalgamation's Pillar III report on remuneration.

13. FULFILMENT OF THE DISCLOSURE REQUIREMENTS

13.1. COMPLIANCE WITH REGULATORY DISCLOSURE REQUIREMENTS

Reference	Reference to pillar 3 report chapter / separate disclosure report	Disclosure Table
	1. Declaration approved by the Board of Directors of the Savings Bank Amalgamation	
CRR 435 (1)		Board Declaration on the adequacy of risk management arrangements Risk profile of the Savings Banks Amalgamation
	2. General principles and objectives for risk management	
CRR 435		EU OVA – Institution risk management approach
	3. Capital adequacy management	
CRR 438 (a),(b)		EU OVC – ICAAP information
CRR 438 (d)		EU OV1 – Overview of total risk exposure amounts
CRR 447 (a)–(g)		EU KM1 – Key metrics
	4. Credit risk	
CRR 435 (1) (a),(b),(d),(f)		EU CRA: General qualitative information about credit risk
CRR 442 (c)		EU CR1: Performing and non-performing exposures and related provisions
CRR 442 (g)		EU CR1-A: Maturity of exposures
CRR 442 (f)		EU CR2: Changes in the stock of non-performing loans and advances
CRR 442 (c)		EU CQ1: Credit quality of forborne exposures
CRR 442 (d)		EU CQ3: Credit quality of performing and non-performing exposures by past due days
CRR 442 (c),(e)		EU CQ5: Credit quality of loans and advances by industry
CRR 442 (c)		EU CQ7: Collateral obtained by taking possession and execution processes
CRR 442 (a), (b)		EU CRB: Additional disclosure related to the credit quality of assets
CRR 444 (a)–(d)		EU CRD – Qualitative disclosure requirements related to standardised model
CRR 453 (f)		EU CR3 – CRM techniques overview: Disclosure of the use of credit risk mitigation techniques
CRR 453 (g),(h),(i); 444 (e)		EU CR4 – standardised approach – Credit risk exposure and CRM effects
CRR 444 (e)		EU CR5 – standardised approach
CRR 453 (a)–(e)		EU CRC – Qualitative disclosure requirements related to CRM techniques

Reference	Reference to pillar 3 report chapter / separate disclosure report	Disclosure Table
	5. Counterparty Credit Risk	
CRR 439 (a), (b), (c), (d)		EU CCRA – Qualitative disclosure related to CCR
CRR 439 (f), (g), (k), (m)		EU CCR1 – Analysis of CCR exposure by approach
CRR 439 (l)		EU CCR3 – Standardised approach – CCR exposures by regulatory exposure class and risk weights
CRR 439 (e)		EU CCR5 – Composition of collateral for CCR exposures
CRR 439 (i)		EU CCR8 – Exposures to CCPs
	6. Credit Valuation Adjustment	
CRR 445a (1)(a),(b)		EU CVAA – Qualitative disclosure requirements to credit valuation adjustment risk
CRR 445a(3)(a)		EU CVA1- Credit valuation adjustment under the Reduced Basic Approach
	7. Market risk	
CRR 435(1)(a)–(d)		EU MRA: Qualitative disclosure requirements related to market risk
CRR 438 (e)		EU CR10 – Specialised lending and equity exposures under the simple riskweighted approach
	8. Interest rate risk in the banking book	
CRR 448(1) (c)–(g)		EU IRRBBA- Qualitative information on interest rate risks of non-trading book activities
CRR 448(1)(a)–(b)		EU IRRBB1-Interest rate risks of non-trading book activities
	9. Liquidity risk	
CRR 435(1), 451a(4)		EU LIQA – Liquidity risk management
CRR 451a(2)		EU LIQB on qualitative information on LCR, which complements EU LIQ1.
CRR 451a(2)		EU LIQ1 – Quantitative information of LCR
CRR 451a(3)		EU LIQ2: Net S Funding Ratio
	10. Asset encumbrance	
CRR 443		EU AE4 – Accompanying narrative information
CRR 443		EU AE2 – Collateral received and own debt securities issued
CRR 443		EU AE3 – Sources of encumbrance
CRR 443		EU AE1 – Encumbered and unencumbered assets
	11. Operational risk	
CRR 446		EU OR2 – Business Indicator, components and subcomponents
CRR 446		EU OR3 – Operational risk own funds requirements and risk exposure amounts
CRR 435, 438 (d), 446		EU ORA – Qualitative information on operational risk

Reference	Reference to pillar 3 report chapter / separate disclosure report	Disclosure Table
	12. Other pillar 3 disclosures	
	12.1 Scope of application	
CRR 436 (b), (c)		EU LI1 – Differences between the accounting scope and the scope of prudential consolidation and mapping of financial statement categories with regulatory risk categories
CRR 436 (b), (d)		EU LIA – Explanations of differences between accounting and regulatory exposure amounts
CRR 436 (b), (d)		EU LI2 – Main sources of differences between regulatory exposure amounts and carrying values in financial statements
CRR 436 (b), (c)		EU LI3 – Outline of the differences in the scopes of consolidation (entity by entity)
CRR 436 (f), (g), (h)		EU LIB – Other qualitative information on the scope of application
CRR 436 (e)		EU PV1 – Prudent valuation adjustments (PVA)
	12.2 Own funds	
CRR Article 437 (a), (d), (e), (f)		EU CC1 – Composition of regulatory own funds
CRR Article 437 (a), (d), (e), (f)		EU CC2 – reconciliation of regulatory own funds to balance sheet in the audited financial statements
CRR 437 (b), (c)		EU CCA: Main features of regulatory own funds instruments and eligible liabilities instruments
	12.3 Countercyclical capital buffers	
CRR 440 (a)		EU CCyB1 – Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer
CRR 440 (b)		EU CCyB2 – Amount of institution-specific countercyclical capital buffer
	12.4 Leverage ratio	
CRR 451 (1), (d), (e)		EU LRA: Disclosure of LR qualitative information
CRR 451 (1) (a),(b),(c)		EU LR1 – LRSum: Summary reconciliation of accounting assets and leverage ratio exposures
CRR 451		EU LR2 – LRCom: Leverage ratio common disclosure
CRR 451		EU LR3 – LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)
	12.5 MREL-requirement	
ITS 2021/763		EU KM2 – Key metrics – MREL and, where applicable, G-SII requirement for own funds and eligible liabilities
ITS 2021/763		EU TLAC1 – Composition – MREL and, where applicable, G-SII requirement for own funds and eligible liabilities
ITS 2021/763		TLAC3b – Creditor ranking – resolution entity
ITS 2021/763	Disclosed in the SP Mortgage bank Plc's Board of Directors Report and IFRS Financial Statement and half year report.	EU iLAC – Internal loss absorbing capacity: internal MREL and, where applicable, requirement for own funds and eligible liabilities for non-EU G-SIIs
ITS 2021/763	Disclosed in the SP Mortgage bank Plc's Board of Directors Report and IFRS Financial Statement	EU TLAC2b -Creditor ranking – Entity that is not a resolution entity

Reference	Reference to pillar 3 report chapter / separate disclosure report	Disclosure Table
CRR 435	12.6 Information on Governance arrangements	
		EU OVB – Disclosure on governance arrangements
	12.7 Remuneration	
CRR 450 (1), (a)–(f), (j), (k), 450 (2)	Disclosed in the document "Savings Bank Amalgamation Pillar III report on remuneration"	EU REMA – Remuneration policy
CRR 450(1), (h)(i), (h)(ii)	Disclosed in the document "Savings Bank Amalgamation Pillar III report on remuneration"	EU REM1 – Remuneration awarded for the financial year
CRR 450(1), (g), (i)	Disclosed in the document "Savings Bank Amalgamation Pillar III report on remuneration"	EU REM5 – Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (identified staff)
	13. Fulfilment of the disclosure requirements	This table

13.2. INFORMATION NOT DISCLOSED BY THE SAVINGS BANKS AMALGAMATION BECAUSE DISCLOSURE REQUIREMENT IS NOT APPLICABLE TO THE SAVINGS BANKS AMALGAMATION

INFORMATION NOT DISCLOSED BY THE SAVINGS BANKS AMALGAMATION BECAUSE DISCLOSURE REQUIREMENT IS NOT APPLICABLE TO THE SAVINGS BANKS AMALGAMATION:

CRR article	Rationale	Disclosure template
442 (c), (f)	Only relevant for large institutions	EU CR2a: Changes in the stock of non-performing loans and advances and related net accumulated recoveries
443 (c), (f)	Only relevant for large institutions	EU CQ2: Quality of forbearance
444 (c), (f)	10% threshold is not exceeded	EU CQ4: Quality of non-performing exposures by geography
438 (e)	No specialized lending	EU 10.1-10.4
442 (c)	Only relevant for large institutions	EU CQ6: Collateral valuation - loans and advances
442 (c)	Only relevant for large institutions	EU CQ8: Collateral obtained by taking possession and execution processes – vintage breakdown
439 (l)	No IRB approach in use.	EU CCR4 – IRB approach – CCR exposures by exposure class and PD scale
439 (j)	No credit derivatives.	EU CCR6 – Credit derivatives exposures
438 (h)	No IMM in use.	EU CCR7 – RWEA flow statements of CCR exposures under the IMM
445	No trading book.	EU MR1 Market risk under the standardised approach
455	No trading book.	Qualitative disclosure requirements for institutions using the internal Market Risk Models
445		MR2-A- Market risk under the internal model Approach (IMA)
445	No trading book.	EU MR2-B - RWA flow statements of market risk exposures under the IMA
445	No trading book.	EU MR3 – IMA values for trading portfolios
452 (a)–(f)	No IRB in use.	EU CRE – Qualitative disclosure requirements related to IRB approach
452 (g)	No IRB in use.	EU CR6 – IRB approach – Credit risk exposures by exposure class and PD range
452 (a)–(f)	No IRB in use.	EU CR6-A – Scope of the use of IRB and SA approaches
453 (g), (j)	No IRB in use.	EU CR7 – IRB approach – Effect on the RWEAs of credit derivatives used as CRM techniques
454 (g), (j)	No IRB in use.	EU CR7-A – IRB approach – Disclosure of the extent of the use of CRM techniques
438 (h)	No IRB in use.	EU CR8 – RWEA flow statements of credit risk exposures under the IRB approach
452 (h)	No IRB in use.	CR9 – IRB approach – Back-testing of PD per exposure class (fixed PD scale)
452 (h)	No IRB in use.	CR9.1 – IRB approach – Back-testing of PD per exposure class (only for PD estimates according to point (f) of Article 180(1) CRR)
445a(2) (a)	Reduced basic approach in use.	EU CVAB – Qualitative disclosure requirements related to CVA risk for institutions using the Standardised Approach
445a (3) (a), (b)	Reduced basic approach in use.	EU CVA 2 – Credit valuation adjustment risk under the Full Basic Approach

CRR article	Rationale	Disclosure template
445a (1) (c); 445a(2) (b), (c)	Reduced basic approach in use.	EU CVA3 – Credit valuation adjustment risk under the Standardised Approach
438 (d), (h)	Reduced basic approach in use.	EU CVA4 – RWA flow statements of credit valuation adjustment risk under the Standardised Approach
449 (a)–(i)	No securitisation positions.	EU-SECA – Qualitative disclosure requirements related to securitisation exposures
449 (j)	No securitisation positions.	EU SEC1 – Securitisation exposures in the non-trading book
449 (j)	No securitisation positions.	EU SEC2 – Securitisation exposures in the trading book
449 (k)	No securitisation positions.	EU SEC3 – Securitisation exposures in the non-trading book and associated regulatory capital requirements – institution acting as originator or as sponsor
450 (k)	No securitisation positions.	EU SEC4 – Securitisation exposures in the non-trading book and associated regulatory capital requirements – institution acting as investor
449 (l)	No securitisation positions.	EU SEC5 – Exposures securitised by the institution – Exposures in default and specific credit risk adjustments
501d(2)	No crypto-asset positions.	EU CAE1 – Exposures to crypto-assets
449a	Not part of the disclosure requirement.	s 1-10 (ESG disclosure)
438 (f)–(g)	No insurance participations	EU INS1 – Insurance participations
439 (f)–(g)	2002/87/EY annex 1 or 2 is not applicable.	EU INS2 – Financial conglomerates information on own funds and capital adequacy ratio
438 (b), (da)	No internal models in use.	EU CMS1 – Comparison of modelled and standardised risk weighted exposure amounts at risk level
438 (d), (da)	No internal models in use.	EU CMS2 EU CMS2 – Comparison of modelled and standardised risk weighted exposure amounts for credit risk at asset class level
446	Not applicable, because CRR 316 (1) article does not apply.	EU OR1 – Operational risk losses
450(1) (h) (v), (h)(vi), (h)(vii)	No special payments have been paid to the indentified staff.	EU REM2 – Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff)
450(1)(h) (iii), (h)(iv)	No deferred remuneration	EU REM3 – Deferred remuneration
450(1)(g), (i)	Remuneration to staff does not exceed EUR 1 million.	EU REM4 – Remuneration of 1 million EUR or more per year



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